

# **PUBLIC DISCLOSURE**

May 12, 2025

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

The Richwood Banking Company, Inc.  
RSSD #150727

28 North Franklin Street  
Richwood, OH 43344

Federal Reserve Bank of Cleveland

P.O. Box 6387  
Cleveland, OH 44101-1387

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, nor should it 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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## INSTITUTION'S COMMUNITY REINVESTMENT ACT (CRA) RATING

**Richwood Banking Company (Richwood) is rated: Outstanding**

The Lending Test is rated: Outstanding

The Community Development Test is rated: Outstanding

The major factors and criteria contributing to this rating include:

- The net loan-to-deposit (NLTD) ratio is reasonable given the institution's size, financial condition, and assessment area (AA) credit needs;
- A majority of loans and other lending-related activities are in the AA;
- The distribution of loans reflects an excellent penetration among individuals of different income levels (including low- and moderate-income) and reasonable among businesses of different sizes; and,
- The geographic distribution of loans reflects excellent dispersion throughout the AA.
- The bank's community development performance demonstrates excellent responsiveness to the community development needs of the AA, considering the bank's capacity and the need and availability of such opportunities in the bank's AA.

## SCOPE OF EXAMINATION

The Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Intermediate Small Institutions* was utilized to evaluate Richwood's CRA Performance under Regulation BB. The evaluation considered CRA performance context, including Richwood's asset size, financial condition, business strategy and market competition, as well as the demographics, economic characteristics, and credit needs of the AAs. The following data was reviewed:

- Richwood's 11-quarter average NLTD ratio
- Home Mortgage Disclosure Act (HMDA)-reportable (home purchase, refinance, home improvement, multi-family, and other purpose closed end) loans were analyzed from January 1, 2022, through December 31, 2023. Small business, consumer (motor vehicle, other secured, and other unsecured), and home equity loans were analyzed from January 1, 2023, through December 31, 2023.
- Based on the total loan volume by number and dollar amount, HMDA-reportable lending received the most weight, followed by small business, home equity, and consumer lending, respectively.

- In accordance with CRA examination procedures, the HMDA universe was reviewed.<sup>1</sup> Conclusions were reached in the aggregate for each year. If lending differed between years, more weight was given to 2022 performance, the year with the most loans by volume and dollar amount. A sample of small business, home equity, and consumer loans was chosen due to significant volume, and as such, an accurate conclusion concerning the bank's lending record could not be reached without their inclusion. Conclusions were reached in the aggregate for consumer loans. There was only enough loan volume to evaluate small business, consumer, and home equity lending in the Columbus AA.
- Borrower distribution received more weight than geographic distribution based on the overall percentage of low- and moderate-income (LMI) families (23.2%) compared to LMI geographies (6.2%).
- Aggregated (peer) lending data, which is comprised of lending activity for all other lenders reporting home mortgage loans under HMDA in the respective AA, was used as a comparison in evaluating the bank's lending performance in 2022 and 2023.
- Lending performance in low-, moderate-, middle-, and upper-income census tracts and to low-, moderate-, middle-, and upper-income borrowers was considered for each product; however, comments for activity in middle- and upper-income tracts and to middle- and upper-income borrowers are only included when they impacted the outcome of the analyses.
- The evaluation period for community development activities was July 13, 2021, through May 12, 2025. Community development activities are comprised of community development loans, qualified investments, and services.

As a full-service intrastate bank with multiple AAs, at least one AA must undergo a full-scope review. The determination of which AAs received full-scope versus limited-scope evaluations was based on the following criteria: the volume of lending by number of loans and dollar amount as a percentage of overall and statewide lending activity, deposit market share, number of branches, percentage of deposits, percentage of low- and moderate-income geographies, volume of community development activity, and other non-financial considerations.

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<sup>1</sup> HMDA data was reviewed since the bank's previous evaluation; however, only data for 2022 and 2023 is presented in this evaluation.

For this evaluation, Richwood has the following three CRA delineated AAs:

- Columbus, OH Metropolitan Statistical Area (MSA) #18140 – Full-scope evaluation
  - Consists of the entireties of Delaware, Madison, and Union counties.
  - Excludes Fairfield, Franklin, Licking, Morrow, and Pickaway counties.
  - Since the previous evaluation Richwood expanded its AA to include the entireties of Delaware and Madison counties.
- Nonmetropolitan Ohio – Limited-scope evaluation
  - Consists of the entireties of Champaign and Logan counties and portions of Hardin and Marion counties.
  - Since the previous evaluation Richwood expanded its AA to include one census tract in Hardin County.
- Springfield, OH MSA #44220 – (Springfield) – Limited-scope evaluation
  - Consists of entirety of Clark County, which is the entirety of the MSA

The Columbus AA was given the greatest weight in the evaluation and selected to undergo a full-scope review, as it contained the largest percentage of branches and originated the largest amount of loans (by number and dollar amount). A detailed description of the full-scope AA is presented in subsequent sections of this performance evaluation.

To better understand AA community development and credit needs, several sources were used, including publicly accessible data and information submitted by the bank. One community contact was conducted. The interview was conducted with a representative from an economic development corporation. The contact operates inside Richwood's AAs. This individual has expertise in their respective fields and is familiar with the economic, social, and demographic characteristics and community development opportunities in the AA. Information obtained from this interview helped establish context for the communities in which Richwood operates and gather information on its performance. More detailed information obtained from this is included in the "Description of the Institution's Operations" section for the full-scope AA.

## DESCRIPTION OF INSTITUTION

Richwood is an intrastate community bank and is a banking subsidiary of Richwood Bancshares; both entities are headquartered in Richwood, Ohio. The bank's characteristics include:

- Richwood has total assets of \$1.2 billion and total deposits of \$ 919.3 million as of December 31, 2023. Total assets increased by 11.9% while total deposits decreased by a 4.2% since the previous evaluation.<sup>2</sup>
- All of Richwood's Automated Teller Machines (ATMs) are cash-only and will be referred to as ATMs throughout this evaluation. In addition to the main office with an ATM, Richwood maintains seven branches with ATMs and one drive-thru only branch with an ATM. Richwood maintains its main office and three branches in the Columbus AA. Richwood maintains three branches in middle-income tracts in Nonmetropolitan Ohio and one branch in a middle-income tract and a drive-thru only branch in a moderate-income tract in the Springfield AA.<sup>3</sup>
- The main office and five branches offer drive-thru services and extended and weekend hours of service. Two branches in Nonmetropolitan Ohio and the drive-through-only branch in the Springfield AA do not offer weekend hours.
- Since the previous evaluation, Richwood has not opened or closed any branches.
- Richwood is a full-service retail bank that offers traditional products, including consumer and business checking and savings accounts, home equity loans, motor vehicle loans, credit cards, and commercial and agriculture loans. Richwood's website [richwoodbank.com](http://richwoodbank.com), customer Contact Center, and online and mobile banking supplements its branch and ATM networks.
- Richwood has seen an upward trend in digital banking enrollment (online banking and mobile usage) since the previous evaluation, especially mobile deposits. Richwood also offers 24-hour telephone banking line that provides customers with deposit and loan account information, as well as funds transfer and loan payment capabilities. The website, mobile banking, telephone banking, and Contact Center services are available to all bank customers regardless of location or income.

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<sup>2</sup> Financial As of Date: March 31, 2021

<sup>3</sup> Effective April 21, 2024, the Springfield Downtown branch changed from a full-service branch to a drive-thru only branch operating Monday-Friday, 10:00 A.M.-5:00 P.M.

The loan portfolio composition as of December 31, 2023, is shown in the table below. Richwood's primary business focus is non-farm non-residential real estate loans followed by residential real estate.

COMPOSITION OF LOAN PORTFOLIO					
Loan Type	12/31/2023		12/31/2022		% Change
	\$ (000s)	Percent	\$ (000s)	Percent	
Construction and Development	71,039	9.3%	47,338	6.6%	50.1%
Secured by One- to Four- Family Dwellings	187,542	24.5%	182,657	25.3%	2.7%
Other Real Estate: Farmland	113,319	14.8%	118,084	16.3%	-4.0%
Multifamily	29,990	3.9%	34,436	4.8%	-12.9%
Nonfarm nonresidential	286,566	37.4%	262,561	36.3%	9.1%
Commercial and Industrial	47,153	6.2%	47,681	6.6%	-1.1%
Loans to Individuals	3,548	0.5%	3,636	0.5%	-2.4%
Agricultural Loans	26,857	3.5%	26,139	3.6%	2.7%
<b>Total</b>	<b>\$766,014</b>	<b>100.00%</b>	<b>\$722,532</b>	<b>100.00%</b>	<b>6.0%</b>
*This table does not include the entire loan portfolio. Specifically, it excludes loans to depository institutions, bankers acceptances, lease financing receivables, obligations of state and political subdivisions, and other loans that do not meet any other category. Contra assets are also not included in this table.					

Richwood's investment portfolio as of December 31, 2023, was \$332.6 million, which represented 28.2% of total assets. U.S. Treasury and Agency securities, municipal bonds, and interest-bearing bank balances accounted for 51.2%, 27.0%, 16.0% of total investments, respectively with the remaining 5.8% comprised of all other securities and fed funds sold.

There are no known legal, financial, or other factors impeding Richwood's ability to help meet the credit needs of its communities.

Richwood was rated Satisfactory under the CRA at its previous evaluation conducted July 12, 2021. The lending and community development tests were each rated Satisfactory.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Richwood's overall CRA performance is rated Outstanding. Details are provided below, including facts, data, and analyses used to form conclusions regarding the lending and community development test performance ratings.

## LENDING TEST

Richwood's performance relative to the lending test is rated Outstanding based on Richwood's loan-to-deposit ratio, AA concentration, and borrower and geographic distribution.

Richwood's performance relative to the lending test is excellent in the Columbus AA and reasonable in Nonmetropolitan Ohio and the Springfield MSA.

### Net Loan-to-Deposit Ratio (NLTD)

A financial institution's NLTD ratio is evaluated to determine the reasonableness of lending considering performance context, such as Richwood's capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AA since the previous evaluation in comparison to similarly situated Federal Deposit Insurance Corporation (FDIC)-insured institutions (custom peer group). To assess the bank's performance, we analyzed the NLTD ratio of comparable institutions. The custom peer group was selected based on asset size, market share, and the area where they are located.

Comparative Loan-to-Deposit (LTD) Ratio		
Institution	Total Assets as of 12/31/2023 \$(000)	NLTD Ratio (%)
		11 – Quarter Average*
Richwood Banking Company, Inc.	\$1,181,242	70.0
<b>Similarly Situated Institutions</b>	<b>\$(000)</b>	<b>Custom Peer Ratio</b>
Citizens NB	\$1,007,407	101.5
Merchants NB	\$1,336,528	84.3
Union Banking Company	\$1,068,193	67.5
<b>Quarterly LTD Ratio Average Since the Previous Evaluation</b>		<b>71.3</b>
<i>* June 30, 2021 - December 31, 2023</i>		<b>84.4</b>

During this period, Richwood's NLTD ratio averaged 70.0%, compared to peer ratio at 84.4%. In discussions with bank management, they indicated its lower LTD ratio compared to peer can be attributed to Richwood's significant amount of municipal and restricted deposits that are not available to be leveraged for lending purposes. Given these factors, Richwood's NLTD ratio is considered reasonable given the bank's size, financial condition, and AA credit needs.



## Assessment Area Concentration

During the evaluation period, Richwood's lending was analyzed to determine the volume of lending inside and outside Richwood's AA. A majority of loans and other lending-related activities are in the AA.

Lending Inside and Outside the Assessment Area								
Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Loan Data	42	93.3	\$405	87.6	3	6.7	\$57	12.4
<b>Total Consumer related</b>	<b>42</b>	<b>93.3</b>	<b>\$405</b>	<b>87.6</b>	<b>3</b>	<b>6.7</b>	<b>\$57</b>	<b>12.4</b>
Home Improvement	8	80	\$619	75.6	2	20	\$200	24.4
Home Purchase - Conventional	127	71.3	\$29,171	70	51	28.7	\$12,480	30
Multi-Family Housing	8	23.5	\$9,693	27.1	26	76.5	\$26,124	72.9
Other Purpose Closed-End	19	100	\$1,820	100	0	0	\$0	0
Refinancing	79	81.4	\$14,637	77.1	18	18.6	\$4,358	22.9
<b>Total HMDA related</b>	<b>241</b>	<b>71.3</b>	<b>\$55,940</b>	<b>56.4</b>	<b>97</b>	<b>28.7</b>	<b>\$43,162</b>	<b>43.6</b>
Home Equity	53	96.4	\$5,617	98.3	2	3.6	\$98	1.7
<b>Total Non-HMDA</b>	<b>53</b>	<b>96.4</b>	<b>\$5,617</b>	<b>98.3</b>	<b>2</b>	<b>3.6</b>	<b>\$98</b>	<b>1.7</b>
Small Business	53	85.5	\$6,263	72.8	9	14.5	\$2,342	27.2
<b>Total Small Bus. related</b>	<b>53</b>	<b>85.5</b>	<b>\$6,263</b>	<b>72.8</b>	<b>9</b>	<b>14.5</b>	<b>\$2,342</b>	<b>27.2</b>
<b>TOTAL LOANS</b>	<b>389</b>	<b>77.8</b>	<b>\$68,226</b>	<b>59.9</b>	<b>111</b>	<b>22.2</b>	<b>\$45,659</b>	<b>40.1</b>
Note: Affiliate loans not included								

Of the bank's total lending from January 1, 2022, to December 31, 2023, 77.8% by volume and 59.9% by dollar amount were made inside the AA.

## Lending to Borrowers of Different Income Levels and to Businesses of Different Sizes

This performance criterion evaluates the bank's penetration of lending among individuals of different incomes (including LMI) levels and businesses of different sizes.

The distribution to borrowers of different income levels is excellent. Borrower distribution is excellent in the Columbus AA and reasonable in the Springfield MSA and Nonmetropolitan Ohio. The penetration among businesses of different sizes is reasonable in the Columbus AA.

## Geographic Distribution of Loans

This performance criterion evaluates the bank's distribution of lending within its AAs by income level of census tracts with consideration given to the dispersion of loans throughout the AAs.

Richwood's geographic distribution of loans reflects excellent dispersion throughout the AA. Richwood has excellent geographic distribution in all three AAs.

### **Response to Complaints**

Neither Richwood nor this Reserve Bank has received any CRA-related complaints since the previous examination.

### **COMMUNITY DEVELOPMENT TEST**

Richwood's performance under the community development test is rated Outstanding.

Richwood's performance relative to the community development test is excellent in all three AAs.

Richwood's community development performance demonstrates an excellent responsiveness to community development needs of its AA through community development loans, qualified investments and small dollar contributions, and community development services, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AA. Richwood's community development activities helped revitalize and stabilize LMI communities through PPP loans to small businesses and supporting moderate-income communities. Community development activities also supported affordable housing initiatives. Since the previous evaluation, Richwood significantly increased its levels of non-PPP community development lending and obtained new complex investments. Richwood invested in two new Low-Income Housing Tax Credits (LIHTC); these types of investments are considered complex and require specific expertise to manage and maintain. The community contact specifically mentioned Richwood as being actively engaged in the community and a reliable source of funding for small businesses. The community contact also emphasized all aspects of affordable housing as a critical need across the AA. The majority of community development activities supported these expressed needs.

From January 29, 2021, through May 18, 2021, Richwood facilitated 781 loans totaling \$21.2 million through the U.S. government's Paycheck Protection Program (PPP). The PPP was designed to help small businesses retain workers and staff impacted by the COVID-19 emergency. Of these loans, 527 (67.5%) loans totaling \$11.9 million were originated within the bank's AA, and 80 (10.2%) loans totaling \$2.6 million were made in LMI tracts.<sup>4</sup> Consistent with

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<sup>4</sup>Richwood also originated 254 PPP loans totaling \$9.3 million in the broader regional area, of which 37 PPP loans totaling \$1.8 million were made in LMI tracts.

information provided in the May 27, 2020, joint statement on CRA Consideration for Activities in Response to Coronavirus FAQs,<sup>5</sup> the PPP loans in LMI tracts are being considered in the community development test. PPP loans were originated outside the evaluation period for the lending test, and therefore, the distribution among businesses of different sizes was not impacted.

### *Community Development Loans*

Richwood originated or renewed 85 community development loans totaling approximately \$12.2 million. The following table reflects the total number of community development loans by purpose, number, and dollar amount.

CD Purpose	#	\$
Revitalization/Stabilization	83	\$7,935,446
Affordable Housing	2	\$4,213,813
<b>Total</b>	<b>85</b>	<b>\$12,149,259</b>
<i>Totals include loans that benefit the broader regional area</i>		

Community development loans primarily address revitalization/stabilization. Richwood originated a community development loan totaling \$4.4 million supporting revitalization/stabilization in Nonmetropolitan Ohio. The remaining revitalization/stabilization loans are PPP loans. There were 80 PPP loans totaling \$2.6 million that benefited small business in LMI geographies in the bank's AAs. PPP loans are considered responsive to credit needs of small businesses and helped to stabilize these communities during the height of the COVID-19 emergency.

Because Richwood has been responsive to community development needs and opportunities in its AAs, consideration was also given to four community development loans totaling nearly \$5.2 million that supported revitalization/stabilization and affordable housing in the broader regional area. Two of these loans (\$950,000) supporting revitalization/stabilization helped a nonprofit purchase a vacant school building and renovate it into a mental health services facility and substance abuse clinic in a moderate-income tract in Mahoning County. The remaining two loans are affordable housing loans that support 40 units of affordable housing for LMI seniors in Mahoning County (\$440,000) and 78 units of subsidized housing for LMI residents in Miami

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<sup>5</sup> [May 27, 2020 - Frequently Asked Questions \(FAQs\) for Consideration for Activities in Response to the Coronavirus](#)

County (\$3.8 million). Both of these housing projects utilize Ohio's LIHTC program. These loans represent 42.5% of total community development loans by dollar amount.

The majority of community development loans by dollar amount were made in the Columbus AA (47.4%), followed by the Springfield MSA (8.9%) and Nonmetropolitan Ohio (1.2%).

### *Community Development Investments*

Richwood has \$2.7 million in qualified community development investments. The following table reflects the total number of qualified investments by purpose, number, and dollar amount:

<b>Purpose of Qualified Investment</b>	<b>#</b>	<b>\$</b>
Affordable Housing	4	\$2,693,085
<b>Total</b>	<b>4</b>	<b>\$2,693,085</b>
<i>Totals include qualified investments that benefit broader regional area</i>		

Richwood obtained three new investments worth \$2.0 million, representing 74.3% of total qualified investments by dollar amount. Richwood obtained a new Ohio LIHTC worth \$500,000 that supports affordable housing initiatives in Marion County in Nonmetropolitan Ohio. Richwood disbursed \$260,944 during the evaluation period. Richwood also obtained a new Ohio LIHTC worth \$500,000 that supports affordable housing initiatives in Delaware County in the Columbus AA (\$250,000) and Clark County in the Springfield MSA (\$250,000). Lastly, Richwood obtained a new mortgage-backed security worth \$1.0 million that supports affordable housing initiatives in the Springfield MSA (\$230,000) and Columbus MSA. New investments in the bank's AAs represent 45.7% of total qualified investments.

Richwood also holds a prior period Ohio LIHTC with a current book value of \$693,085, representing 25.7% of total qualified investments by dollar amount. This investment continues to support affordable housing initiatives in Logan County in Nonmetropolitan Ohio.

Because Richwood has been responsive to community development needs and opportunities in its AAs, consideration was given to the portion of a mortgage-backed security that benefited the broader regional area in the Columbus MSA (\$770,000). This allocation represents 28.6% of total qualified investments.

Richwood also made 50 small dollar donations totaling \$105,822 during the evaluation period. The following table reflects the total number community development small dollar donations by purpose, number, and dollar amount.

Purpose of Donations	#	\$
Services to LMI	42	\$91,326
Affordable Housing	8	\$14,496
<b>Total</b>	<b>50</b>	<b>\$105,822</b>

Most contributions supported organizations that provide wraparound services targeted to LMI individuals and families, followed by affordable housing.

Richwood had \$2.8 million in total qualified investments and small dollar contributions during the evaluation period, with 43.2% by dollar amount benefiting Nonmetropolitan Ohio, followed by the Springfield MSA (17.6%) and the Columbus AA (11.7%). The remaining 27.5% benefited the broader regional area.

Also, Richwood is an Ohio Interest on Lawyers' Trust Accounts (IOLTA) prime partner financial institution. The interest generated by paying premium interest rates supports critical legal services and improves access for LMI individuals in Ohio. As a prime partner, Richwood pays a net yield of at least .75 bps or 75% federal funds target rate, whichever is higher. During the evaluation period, Richwood paid higher interest rates to the Ohio Access to Justice Foundation in all three AAs.

### *Community Development Services*

The following table provides a breakdown of qualified community development services by community development purpose.

Purpose of CD Service	# Services	# Organizations	# Employees*	# Hours
Services to LMI	30	12	13	380
Affordable Housing	2	2	2	24
<b>Total</b>	<b>32</b>	<b>14</b>	<b>15</b>	<b>404</b>
<i>*Some employees may be double counted if performed more than one services</i>				

Employees were involved with organizations and activities that promote community services targeted to LMI individuals and to a lesser extent affordable housing. Bank officers and

employees worked with a variety of community service organizations, throughout the AA during the evaluation period. Most of Richwood's community development services are provided through serving on boards and committees (279 hours), followed by providing technical assistance (76 hours), and financial literacy training (49 hours).

The largest concentration of community development services benefited the Columbus AA, accounting for 65.1% of total community development services. The remaining 33.4% benefited the Springfield MSA and 1.5% benefited Nonmetropolitan Ohio.

Community development services included the following:

Board and Committee Memberships – Richwood's officers and managers provided financial expertise through their involvement with community development organizations throughout the AAs by serving as board directors, loan committee members, or treasurers.

Technical Assistance – Employees provided technical assistance which included fundraising and program development for nonprofit organizations.

Financial Education – Richwood uses the Banzai's courses for teaching financial literacy and provides all associated classroom materials and in-person instruction. Financial literacy topics include but are not limited to financial responsibility and decision making, planning and money management, informed consumer decision making, and credit and debt management tools.

#### **FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

The Federal Reserve Bank of Cleveland conducted a fair lending analysis performed under Regulation B – Equal Credit Opportunity Act and Fair Housing Act requirements and was conducted concurrently with this CRA evaluation. No evidence of a pattern or practice of discrimination on a prohibited basis or of other illegal credit practices inconsistent with helping to meeting community credit needs was identified.

## METROPOLITAN AREA

(Full-scope Review)

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN COLUMBUS OH MSA #18140

Richwood's delineated AA consists of the entireties of Delaware, Madison, and Union counties. Since the previous evaluation, Richwood modified this AA to include the entirety of Delaware County in 2022 and the entirety of Madison County in 2023. In addition, the Census Bureau released new size and population data from the 2020 Census on August 12, 2021. As a result of these changes, the AA was comprised of the following tracts:

Income Tract Designations Assessment Area: Columbus, OH MSA		
Income Tract Level	Number of Tracts	
	2022	2023
Low	0	0
Moderate	4	4
Middle	20	25
Upper	35	36
Unknown	0	0
<b>Total</b>	<b>59</b>	<b>65</b>

- Based on Census data changes and modifications to the AA, the AA gained one moderate- and 25 upper-income tracts and lost one middle-income tract in 2022. There were no changes to the number of low- and unknown-income tracts. Based on modifications to the AA, the AA gained five middle- and one upper-income tracts in 2023. There were no changes to the number of low- moderate- or unknown-income tracts.
- As of June 30, 2023, the Federal Deposit Insurance Corporation's (FDIC) Deposit Market Share report, ranks Richwood fifth among 20 institutions operating in the AA with 9.4% of the deposit market share, compared to the three largest market holders, JP Morgan Chase Bank, National Association; The Huntington National Bank; and PNC Bank, National Association, which hold a 26.3%, 20.6%, and 13.1% of the market, respectively. In the MSA, Richwood ranks 13<sup>th</sup> among 54 institutions with 0.7% of the deposit market share, compared to the three largest market holders, The Huntington National Bank; JP Morgan Chase Bank, National Association; and PNC Bank, National Association, which hold a 40.0%, 24.3%, and 7.2% of the market, respectively. These top three financial institutions operate 168 branches in the MSA, compared to Richwood's four branches. Richwood has a minimal presence in this competitive market.

- The 2023 HMDA Peer Market data indicate Richwood ranked 46<sup>th</sup> out of 362 HMDA reporters in Columbus MSA and originated 45 loans. By comparison, first ranked The Huntington National Bank, second ranked Third Federal Savings and Loan, and third ranked Fifth Third Bank, National Association, originated 1,309, 552, and 369 loans, respectively.
- The 2022 HMDA Peer Market data indicate Richwood ranked 33<sup>rd</sup> out of 412 HMDA reporters in Columbus MSA and originated 103 loans. By comparison, first ranked The Huntington National Bank, second ranked Third Federal Savings and Loan, and third ranked Fifth Third Bank, National Association, originated 1,671, 891, and 637 loans, respectively.
- Between 2022 and 2023, the total number of HMDA reporters in the MSA declined by 12.1% and originated mortgage loans declined by 25.9% among these same HMDA reporters. Richwood's originated mortgage loans declined by 56.3% during this period.

### **Community Contact**

A community contact interview was conducted as part of this evaluation to provide supplemental information regarding the area's credit needs and context to demographic and economic conditions of the local community. The contact was from an economic development corporation in Union County. According to the contact, community banks are very engaged in the community and are typically a more reliable source of funding for small businesses, compared to large financial institutions. The contact specifically mentioned Richwood as being actively engaged in the community. The contact indicated the most urgent need in the community is affordable housing. The contact stated while there are quality manufacturing and hospitality jobs available, open positions remain unfilled due to the mismatch between job opportunities and affordable housing options. Also, a large percentage of workers live outside the county, commuting as much as 100-miles roundtrip. Such long commutes can be a considerable time commitment and financial burden and ultimately be unsustainable. The community lacks reliable public transit, which also impacts job accessibility. The contact indicated there are opportunities for financial institutions to help address the lack of available and affordable housing, especially since the lack of housing negatively impacts economic growth.



## Population Characteristics

Population Change Assessment Area: Columbus, OH MSA			
Area	2020 Population	2023 Population	Percent Change
Delaware County	214,124	231,636	8.2%
Madison County	43,824	44,602	1.8%
Union County	62,784	69,637	10.9%
<b>Assessment Area</b>	<b>320,732</b>	<b>345,875</b>	<b>7.8%</b>
<b>Columbus, OH MSA</b>	<b>2,138,926</b>	<b>2,195,029</b>	<b>2.6%</b>
<b>Ohio</b>	<b>11,799,448</b>	<b>11,824,034</b>	<b>0.2%</b>
Source: 2020-2023 U.S. Census Bureau 2020 U.S. Census Bureau Decennial Census			

- From 2020 through 2023 the AA experienced a 7.8% increase in population, compared to the MSA and Ohio, which experienced increases of 2.6% and 0.2%, respectively. Union County experienced the largest increase in population at 10.9% during this period.
- 75.9% of the AA population was 18 years of age or older, the legal age to enter a contract.
- The majority of the AA population (51.1%) was between the ages of 25 and 64, which is the prime-working age.
- 13.1% of the population in the AA was 65 or older, compared to 16.9% in Ohio.
- The overall population growth, higher percentage of working age, and lower percentage of elderly population indicates the area has a large labor pool which can help drive economic growth.
- 3.8% of the AA's population reside in moderate-income tracts.
- According to Census data, Delaware (Delaware County) is the most populous city in the AA with 45,158 residents, and its population increased by 9.3% between 2020 and 2023. Marysville is the most populous city in Union County with 28,423 residents, and its population increased by 11.1% between 2020 and 2023. London is the most populous city in Madison County with 28,423 residents, and its population increased by 2.5% between 2020 and 2023.<sup>6</sup>

<sup>6</sup> [Ohio County Profiles](#)

## Income Characteristics

### Borrower Income Levels Columbus OH MSA

FFIEC Estimated Median Family Income		% Change	Low	Moderate	Middle	Upper
			0 - 49.99%	50% - 79.99%	80% - 119.99%	120% - & above
2022	\$95,600		0 - \$47,799	\$47,800 - \$76,479	\$76,480 - \$114,719	\$114,720 - & above
2023	\$100,900	5.5%	0 - \$50,449	\$50,450 - \$80,719	\$80,720 - \$121,079	\$121,080 - & above

- During the evaluation period, median family income (MFI) in the MSA increased by 5.5%.
- 2020 MFI in the MSA was \$84,088, which represents a 13.7% increase from 2020 to 2022 and a 20.0% increase from 2020 to 2023.
- By comparison, in 2020 the AA MFI was \$117,375, which was 57.8% higher than MFI in Ohio and 39.6% higher than MFI in the MSA.
- Ohio minimum wage<sup>7</sup> in 2023 was \$10.10 per hour or \$21,008 annually. The Federal minimum wage is \$7.25<sup>8</sup> per hour and has not increased since 2009.

Poverty Rates				
Assessment Area: Columbus, OH MSA				
Area	2020	2021	2022	2023
Delaware County	3.7%	4.1%	4.6%	5.0%
Madison County	9.5%	13.4%	10.0%	9.3%
Union County	5.0%	5.5%	5.2%	5.4%
Ohio	12.6%	13.3%	13.4%	13.2%
United States	11.9%	12.8%	12.6%	12.5%
Source: Federal Reserve Economic Data   FRED   St. Louis Fed				

- Poverty rates in the AA were consistently lower than rates in Ohio and the nation, except in 2021 in Madison County when the county's poverty rate exceeded rates in Ohio and the nation.
- Of the 80,126 families in the AA, 23.2% are designated as LMI and 3.6% of families are living below the poverty level, compared to 9.6% of families living below the poverty level in Ohio and 8.8% living below the poverty level in the MSA.

<sup>7</sup> [Ohio Minimum Wage](#)

<sup>8</sup> [Federal Minimum Wage](#)

- Of the 107,233 households in the AA, 5.6% are below the poverty level and 1.2% receive public assistance; compared to 13.4% of households across Ohio that are below the poverty level.
- Supplemental Nutrition Assistance Program (SNAP)<sup>9</sup> helps LMI individuals and families, the elderly, and the working poor purchase food and reduce food insecurity and may free up resources for other necessities, such as clothing, housing, and medical expenses.

SNAP Recipients		
Assessment Area: Columbus, OH MSA		
Area	2021	2022
Delaware County	2.7%	2.6%
Madison County	9.3%	9.0%
Union County	3.9%	3.9%
Ohio	12.6%	12.2%
Source: Federal Reserve Economic Data   FRED   St. Louis Fed		

- Corresponding with poverty rates, Madison County had the highest percentage of individuals receiving SNAP benefits and Delaware county had the lowest.

### Housing Characteristics

Housing Cost Change						
Assessment Area: Columbus, OH MSA						
Area	Median Housing Values			Median Gross Rent		
	2020	2023	Percent Change	2020	2023	Percent Change
Delaware County	\$320,300	\$419,500	31.0%	\$1,118	\$1,433	28.2%
Madison County	\$169,200	\$231,400	36.8%	\$856	\$944	10.3%
Union County	\$220,300	\$306,600	39.2%	\$981	\$1,188	21.1%
Ohio	\$151,400	\$199,200	31.6%	\$825	\$988	19.8%
Source: 2019-2023 U.S. Census Bureau: American Community Survey						
2016-2020 U.S. Census Bureau: American Community Survey						

- The median housing values throughout the AA increased between 31.0% to 39.2%, compared to 31.6% in Ohio. MFI did not keep pace with home price growth. Overall, housing became less affordable across the AA during this period.

<sup>9</sup> [FRED – SNAP Benefits Recipients](#)

- Based on 2020 Census data, the affordability ratio<sup>10</sup> was 35.2 in the AA compared to 38.4 in Ohio. Housing was generally less affordable across the AA than in other parts of Ohio.
- From 2020 to 2023, median gross rent throughout the AA increased between 10.3% to 28.2%. The rise in median gross rents indicates the need for more affordable housing. According to 2020 Census data, 32.2% of all renters in the AA had rental costs that were greater than 30.0% of their income.
- According to HUD's 2023 Fair Market Rent (FMR) data,<sup>11</sup> the average rent for a two-bedroom unit in Columbus MSA is 1,163, up from \$1,032 in 2022, an increase of 11.2% in one year.
- With Ohio's minimum wage at \$10.10, renters across Ohio can only afford \$525 in monthly rent. The typical minimum wage worker cannot afford rent for a FMR two-bedroom apartment or would have to work 115 hours a week to afford a modest two-bedroom apartment in this AA. If a minimum wage worker is only working 40 hours per week, 72.0% of their hours worked are going towards payment of rent, leaving just \$453 a month for other living essentials.
- According to the National Low Income Housing Coalition,<sup>12</sup> full-time workers must earn at least \$20.81 an hour (\$43,284.80 annual salary) in Ohio to afford a two-bedroom rental apartment, which is double the minimum wage in the state. Rents continue to increase nationwide; currently the national average rent is \$1,486 a month, which requires workers to earn a minimum wage of \$28.58 (\$59,446 annual salary).<sup>13</sup>
- There are 112,653 housing units in the AA, of which 75.7% are owner-occupied, 19.5% are rentals, and 4.8% are vacant. Housing units in the AA primarily consist of single-family (83.6%) and multi-family (13.6%) dwellings.
- The median age of housing stock in the AA is 35 years old, and 13.3% of housing units were built prior to 1950. The age of housing stock demonstrates a potential need for home improvement lending and refinance or home improvement loans to remove lead-based paint that was commonly used in houses and apartments built before 1978.<sup>14</sup>

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<sup>10</sup> The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered.

<sup>11</sup> [FY 2023 HUD Fair Market Rent \(FMR\) - Columbus, OH Metro Area](#)

<sup>12</sup> [Out of Reach: Ohio | National Low Income Housing Coalition](#)

<sup>13</sup> [National Low Income Housing Coalition](#)

<sup>14</sup> [Ohio Department of Health – Lead Paint Hazards](#)

Housing Cost Burden						
Assessment Area: Columbus, OH MSA						
Area	Cost Burden - Owners			Cost Burden - Renters		
	Low Income	Moderate Income	All Owners	Low Income	Moderate Income	All Renters
Delaware County	71.6%	45.7%	15.1%	74.3%	40.8%	28.9%
Madison County	60.3%	24.0%	14.9%	59.2%	20.4%	27.2%
Union County	61.3%	23.1%	12.7%	64.3%	12.3%	26.9%
<b>Assessment Area</b>	<b>66.7%</b>	<b>35.3%</b>	<b>14.6%</b>	<b>69.1%</b>	<b>31.4%</b>	<b>28.3%</b>
<b>Columbus, OH MSA</b>	<b>64.2%</b>	<b>31.4%</b>	<b>16.6%</b>	<b>76.2%</b>	<b>31.3%</b>	<b>38.1%</b>
<b>Ohio</b>	<b>60.4%</b>	<b>27.2%</b>	<b>16.1%</b>	<b>71.7%</b>	<b>27.0%</b>	<b>38.6%</b>
<i>Cost Burden is housing cost that equals 30 percent or more of household income</i>						
<i>Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy</i>						

- 66.7% of low-income homeowners and 69.1% of low-income renters in the AA are cost burdened, compared to 35.3% of moderate-income homeowners and 31.4% of moderate-income renters in the MSA.
- 14.6% of all homeowners and 28.3% of all renters across the AA are cost burdened, compared to 16.1% of all homeowners and 38.6% of all renters across Ohio.
- Across the MSA, 16.6% of all homeowners compared to 38.1% of all renters are cost burdened.
- The data shows cost burden disproportionately affects renter-occupied households, particularly low-income renters as well as low-income homeowners.
- Cost-burdened renters may have a difficult time saving enough money to make a sufficient down payment to purchase a home or otherwise afford increasing rents.

Unemployment Rates			
Assessment Area: Columbus, OH MSA			
Area	2021	2022	2023
Delaware County	3.7%	3.0%	2.8%
Madison County	3.9%	3.2%	3.0%
Union County	3.6%	3.0%	2.8%
<b>Assessment Area</b>	<b>3.7%</b>	<b>3.0%</b>	<b>2.8%</b>
<b>Columbus, OH MSA</b>	<b>4.7%</b>	<b>3.4%</b>	<b>3.1%</b>
<b>Ohio</b>	<b>5.1%</b>	<b>4.0%</b>	<b>3.5%</b>
<i>Source: Bureau of Labor Statistics(BLS), Local Area Unemployment Statistics</i>			

- Between 2021 to 2023 unemployment rates decreased across the AA. The average unemployment rate in the AA decreased from 3.7% in 2021 to 2.8% in 2023.

Unemployment rates across the AA were substantially lower than unemployment rates in Ohio throughout this period.

- According to Ohio Demographics,<sup>15</sup> Delaware County is the richest county in Ohio with a median household income of \$130,088 as of 2023, followed by fourth ranked Union County and 16<sup>th</sup> ranked Madison County with a median household income of \$109,506 and \$83,229, respectively.
- According to Ohio Office of Research:<sup>16</sup>
  - Delaware County
    - Land use is primarily rural with 21.9% available for urban (i.e., residential, commercial, industrial, or recreational) development.
    - The leading industries are professional and business services; trade, transportation, and utilities; and Leisure and hospitality.
    - The average private sector weekly wage at \$1,290 indicates employed persons can afford the median rent of \$1,338.
    - Major employers include Anthem Blue Cross Blue Shield, Kroger Co., McGraw Hill Companies, Ohio Wesleyan University, OhioHealth/Grady Memorial Hospital, and Optum.
  - Madison County
    - Land use is primarily rural with only 7.0.% available for urban (i.e., residential, commercial, industrial, or recreational) development.
    - The leading industries are trade, transportation, and utilities; manufacturing; and professional and business services.
    - The average private sector weekly wage at \$837 indicates employed persons can afford the median rent of \$899.
    - Major employers include Amazon, Madison Health, Nissen Chemitec, and Honeywell Intelligrated.
  - Union County
    - Land use is primarily rural with only 10.4% available for urban (i.e., residential, commercial, industrial, or recreational) development.
    - The leading industries are trade, transportation, and utilities; professional and business services; and goods producing.
    - The average private sector weekly wage at \$1,388 indicates employed persons can afford the median rent of \$1,144.
    - Major employers include Wal-Mart Stores Inc., Parker Hannifin Corp., Scotts Miracle-Grow Co., Continental A.G., and Honda Motor Co. Ltd.

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<sup>15</sup> [Richest Counties in Ohio](#)

<sup>16</sup> [Ohio County Profiles](#)

- Based on 2020 Census data and BroadbandOhio:<sup>17</sup>
  - 36.0% of the populated area and 5.0% of households in Delaware County do not have access to minimum broadband enabled internet.
  - 69.0% of the populated area and 24.0% of households in Madison County do not have access to the minimum level of broadband enabled internet.
  - 75.0% of the populated area and 27% of households in Union County do not have access to the minimum level of broadband internet.Nationally, those with access to a broadband-enabled computer are employed at a higher rate in urban and rural counties.

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<sup>17</sup> [BroadbandOhio – Availability Gaps](#)

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN  
COLUMBUS OH MSA #18140**

**LENDING TEST**

Richwood's performance relative to the lending test is excellent.

**Lending to Borrowers of Different Income Levels and to Businesses of Different Sizes**

Borrower distribution received greater weight than geographic distribution given the overall percentage of LMI families compared to the overall percentage of LMI geographies.

The distribution to borrowers of different income (including LMI) levels is excellent and reasonable among businesses of different sizes. Borrower distribution of HMDA, home equity, and consumer lending is excellent.

***HMDA Lending***

HMDA loans are comprised of home purchase, refinance, home improvement, other purpose closed end, and multi-family, respectively. See Appendix C for explicit HMDA lending data. Richwood's performance was compared to the percentage of families by family income (proxy) and aggregate lending data.

Richwood originated 148 HMDA loans totaling \$39.6 million during the evaluation period. In 2023, Richwood originated 45 HMDA loans totaling \$8.9 million, of which 13.3% were originated to borrowers with unknown-income designations, compared to aggregate lending performance at 13.1%. In 2022, Richwood originated 103 HMDA loans totaling \$30.7 million, of which 15.5% were originated to borrowers with unknown-income designations, compared to aggregate lending performance at 12.5%.

In 2023, Richwood originated three (6.7%) HMDA loans to low-income borrowers, which was below proxy at 10.9%, but significantly exceeded aggregate lending performance at 3.6%. Richwood originated 11 (24.4%) of HMDA loans to moderate-income borrowers, which significantly exceeded proxy at 12.3% and aggregate lending performance at 11.1%. In 2022, Richwood originated 14 (13.6%) HMDA loans to low-income borrowers, which exceeded proxy at 10.2% and significantly exceeded aggregate lending performance at 3.4%. Richwood originated 22 (21.4%) HMDA loans to moderate-income borrowers which significantly exceeded



proxy at 11.9% and significantly exceeded aggregate lending performance at 10.9%.

Considering performance consistently exceeded demographic and aggregate comparators, Richwood's borrower distribution of HMDA lending to LMI borrowers is excellent. The community contact indicated access to affordable housing is an urgent need in the area.

### *Small Business Lending*

Richwood's performance was compared to the percentage of small businesses (proxy). During the evaluation period, Richwood originated 35 loans to businesses of different sizes totaling \$5.0 million.

#### **Small Business Loans by Business Revenue & Loan Size**

Assessment Area: Columbus OH MSA

		Bank Lending & Demographic Data 2023				
		Count		Dollar		Total Businesses
Revenue	\$1 Million or Less	15	42.9%	1,094	22.0%	91.7%
	Over \$1 Million	17	48.6%	3,659	73.7%	6.9%
	Total Rev. available	32	91.4%	4,753	95.7%	98.6%
	Rev. Not Known	3	8.6%	211	4.3%	1.4%
	Total	35	100%	4,964	100%	100%
Loan Size	\$100,000 or Less	23	65.7%	1,375	27.7%	
	\$100,001 - \$250,000	7	20.0%	1,354	27.3%	
	\$250,001 - \$1 Million	5	14.3%	2,235	45.0%	
	Total	35	100%	4,964	100%	
Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	13	86.7%	688	62.9%	
	\$100,001 - \$250,000	2	13.3%	405	37.0%	
	\$250,001 - \$1 Million	0	0.0%	0	0.0%	
	Total	15	100%	1,094	100%	

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data; 2023 D&B information

Percentages may not total 100 percent due to rounding

Richwood originated 35 loans totaling \$5.0 million to businesses, of which three (8.6%) loans were made to businesses of unknown revenues. Fifteen (42.9%) totaling \$1.1 million were originated to businesses with revenues of \$1.0 million or less, which was below proxy at 91.7%. However,

30 (85.7%) small dollar loans were originated in amounts of \$250,000 or less, indicating a good willingness to lend in smaller amounts that are typically requested by small businesses. The community contact indicated the importance for small businesses to have access to small dollar loans. Considering these factors, the distribution among businesses of different sizes is reasonable.

### *Home Equity Lending*

Richwood's performance was compared to the percentage of families (proxy) by family income. During the evaluation period, Richwood originated 42 home equity loans totaling \$4.9 million.

#### **Borrower Distribution of Home Equity Loans**

Assessment Area: Columbus OH MSA

Household Income Levels	Bank Lending & Demographic Data 2023				
	Count		Dollar		Families by Family Income
	#	%	\$ (000s)	\$ %	%
Low	7	16.7%	522	10.6%	10.9%
Moderate	8	19.0%	593	12.1%	12.3%
Middle	10	23.8%	872	17.8%	17.2%
Upper	17	40.5%	2,925	59.5%	59.6%
Unknown	0	0.0%	0	0.0%	
<i>Total</i>	<i>42</i>	<i>100.0%</i>	<i>4,912</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Percentages may not total 100 percent due to rounding

Richwood originated seven (16.7%) home equity loans to low-income borrowers, which significantly exceeded proxy at 10.9%. Richwood originated eight (19.0%) home equity loans to moderate-income borrowers, which significantly exceeded proxy at 12.3%. Richwood's borrower distribution of home equity loans to LMI borrowers is excellent.

### Consumer Lending

Consumer loans are comprised of motor vehicle, other secured, and other unsecured loans.

Richwood's performance was compared to the percentage of households by household income (proxy). During the evaluation period Richwood originated 30 consumer loans totaling \$277,000.

#### Borrower Distribution of Consumer Loans

Assessment Area: Columbus OH MSA

Household Income Levels	Bank Lending & Demographic Data 2023				Households by Household
	Count		Dollar		
	#	%	\$ (000s)	\$ %	%
Low	13	43.3%	99	35.7%	13.0%
Moderate	7	23.3%	56	20.2%	11.7%
Middle	6	20.0%	48	17.3%	15.6%
Upper	4	13.3%	73	26.4%	59.8%
Unknown	0	0.0%	0	0.0%	
Total	30	100.0%	277	100.0%	100.0%

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Percentages may not total 100 percent due to rounding

Richwood originated 13 (43.3%) consumer loans to low-income borrowers, which significantly exceeded proxy at 13.0%. Richwood originated seven (23.3%) consumer loans to moderate-income borrowers, which significantly exceeded proxy at 11.7%. Richwood's borrower distribution of consumer lending to LMI borrowers is excellent.

### Geographic Distribution of Loans

Richwood's geographic distribution of loans reflects an excellent dispersion throughout the AA. Geographic distribution of HMDA, small business, home equity, and consumer lending is excellent. There was a moderate level of lending gaps.

Lending Penetration								
	Columbus OH MSA - 2022				Columbus OH MSA - 2023			
	# Tracts	Tracts w/ no loans	Tracts w/ Loans	Penetration	# Tracts	Tracts w/ no loans	Tracts w/ Loans	Penetration
Low	0	0	0	No Tracts	0	0	0	No Tracts
Moderate	4	0	4	100.0%	4	1	3	75.0%
Middle	20	10	10	50.0%	25	9	16	64.0%
Upper	35	22	13	37.1%	36	23	13	36.1%
Unknown	0	0	0	No Tracts	0	0	0	No Tracts
<b>Total</b>	<b>59</b>	<b>32</b>	<b>27</b>	<b>45.8%</b>	<b>65</b>	<b>33</b>	<b>32</b>	<b>49.2%</b>

During the evaluation period, Richwood penetrated 47.5% of the AA's total tracts, which is a substantial level of lending gaps. However, Richwood penetrated 87.5% of its moderate-income tracts, which is a moderate level of lending gaps. Considering less than 5.0% of total housing units are in moderate-income tracts and 38.9% are either rental or vacant units and Richwood's minimal presence in this competitive market, lending opportunities are likely to be limited in this AA, particularly in moderate-income tracts.

### *HMDA Lending*

Richwood's performance was compared to the percentage of owner-occupied units (proxy) and aggregate lending data.

Richwood originated 148 HMDA loans totaling \$39.6 million during the evaluation period. In 2023, Richwood originated four (8.9%) HMDA loans in moderate-income tracts, which significantly exceeded proxy at 4.0% and aggregate lending performance at 2.3%. In 2022, Richwood originated 10 (9.7%) HMDA loans in moderate-income tracts, which significantly exceeded proxy at 4.3% and aggregate lending performance at 2.4%. Richwood's geographic distribution of HMDA lending in moderate-income tracts is excellent.

### *Small Business Lending*

Richwood's performance was compared to the percentage of businesses by tract income (proxy). During the evaluation period, Richwood originated 35 small business loans totaling \$5.0 million.

### Geographic Distribution of Small Business Loans

Assessment Area: Columbus OH MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data 2023				
		Count		Dollar		Total Businesses %
		#	%	\$ (000s)	\$ %	
SMALL BUSINESSES	Low	0	0.0%	0	0.0%	0.0%
	Moderate	3	8.6%	479	9.6%	2.7%
	Middle	19	54.3%	1,912	38.5%	26.4%
	Upper	13	37.1%	2,573	51.8%	70.8%
	Unknown	0	0.0%	0	0.0%	0.0%
	<i>Total</i>	<i>35</i>	<i>100%</i>	<i>4,964</i>	<i>100%</i>	<i>100.0%</i>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data; 2023 D&B information

Percentages may not total 100 percent due to rounding

Richwood originated three (8.6%) small business loans in moderate-income tracts which significantly exceeded proxy at 2.7%. The geographic distribution of small business lending in moderate-income tracts is excellent.

### Home Equity Lending

Richwood's performance was compared to the percentage of owner-occupied units (proxy). During the evaluation period, Richwood originated 42 home equity loans totaling \$4.9 million.

### Geographic Distribution of Home Equity Loans

Assessment Area: Columbus OH MSA

Tract Income Levels	Bank Lending & Demographic Data				
	2023				
	Count		Dollar		Owner
	#	%	\$ (000s)	\$ %	Occupied Units %
Low	0	0.0%	0	0.0%	0.0%
Moderate	2	4.8%	150	3.1%	4.0%
Middle	21	50.0%	3,200	65.1%	31.8%
Upper	19	45.2%	1,561	31.8%	64.2%
Unknown	0	0.0%	0	0.0%	0.0%
<i>Total</i>	<i>42</i>	<i>100%</i>	<i>4,912</i>	<i>100%</i>	<i>100.0%</i>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Percentages may not total 100 percent due to rounding

Richwood originated two (4.8%) home equity loans in moderate-income tracts, which exceeded proxy at 4.0%. The geographic distribution of home equity loans in moderate-income tracts is excellent.

### Consumer Lending

Richwood's performance was compared to the percentage of households (proxy). During the evaluation period, Richwood originated 30 consumer loans totaling \$277,000.

### Geographic Distribution of Consumer Loans

Assessment Area: Columbus OH MSA

Tract Income Levels	Bank Lending & Demographic Data				
	2023				
	Count		Dollar		Households
	#	%	\$ (000s)	\$ %	%
Low	0	0.0%	0	0.0%	0.0%
Moderate	5	16.7%	51	18.4%	4.8%
Middle	19	63.3%	142	51.3%	35.5%
Upper	6	20.0%	85	30.7%	59.7%
Unknown	0	0.0%	0	0.0%	0.0%
<b>Total</b>	<b>30</b>	<b>100%</b>	<b>277</b>	<b>100%</b>	<b>100.0%</b>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Percentages may not total 100 percent due to rounding

Richwood originated five (16.7%) consumer loans in moderate-income tracts, which significantly exceeded proxy at 4.8%. The geographic distribution of consumer lending in moderate-income tracts is excellent.

### COMMUNITY DEVELOPMENT TEST

Richwood's community development performance demonstrates excellent responsiveness to the credit and community development needs of its AA through community development loans, qualified investments and contributions, and community development services, considering Richwood's capacity and the need and availability of such opportunities in the AA.

#### *Community Development Loans*

Richwood originated 52 community development loans totaling approximately \$5.8 million, representing 47.3% of total community development loans. The following table reflects the total number of community development loans by purpose, number, and dollar amount.

CD Purpose	#	\$
Revitalization/Stabilization	52	\$5,752,706
<b>Total</b>	<b>52</b>	<b>\$5,752,706</b>

### Revitalization/Stabilization

- A construction loan totaling \$4.4 million that provided funding to build a new fire station that serves three townships, including a moderate-income community in Delaware County.
- 51 PPP loans totaling \$1.3 million made to small businesses in LMI geographies.

### Community Development Investments

Richwood had \$328,543 in qualified investments and small dollar contributions during the evaluation period, representing 11.7% of total qualified investments and contributions.

Richwood obtained a new LIHTC worth \$250,000 that supports affordable housing initiatives in Delaware County.

The following table shows the total number of qualified donations by purpose, number, and dollar amount.

Purpose of Donation	#	\$
Services to LMI	26	\$64,047
Affordable Housing	8	\$14,495
<b>Total</b>	<b>34</b>	<b>\$78,543</b>

Impactful donations include:

- \$14,495 (eight donations) to a global nonprofit organization that provides affordable housing for LMI individuals and families.
- \$13,722 (two donations) to a nonprofit that provides funding to alleviate the impact of poverty.
- \$8,427 (one donation) to an organization that provides emergency assistance to LMI individuals and families.
- \$5,990 (two donations) to a hospital offering financial assistance to LMI patients or free care for those that qualify through the Hospital Care Assurance Program (HCAP).

### Community Development Services

The following table provides a breakdown of qualified community development services by community development purpose.



Purpose of CD Service	# Services	# Organizations*	# Employees*	# Hours
LMI Services	12	5	7	257
Affordable Housing	1	1	1	6
	<b>13</b>	<b>6</b>	<b>8</b>	<b>263</b>
<i>*Some organizations and employees may be double-counted if received/performed more than one service</i>				

Employees were involved with organizations and activities that promote community services targeted to LMI individuals and to a lesser extent affordable housing. Bank officers and employees worked with a variety of community service organizations, throughout the AA during the evaluation period. Most of Richwood's community development services are provided through serving on boards and committees (151 hours) followed by providing technical assistance (76 hours) and financial literacy training (36 hours). Service hours represent 65.1% of total community development service hours.

#### **Serving on Boards and Committees**

- Four employees serve as board members of two large nonprofit organizations that provide wraparound services to LMI individuals and families.
- One employee serves on the board of a global nonprofit organization that provides affordable housing for LMI individuals and families.

#### **Technical Expertise**

- One employee helped a nonprofit organization with fundraising campaigns.
- One employee helped with program development for two nonprofit organizations.

#### **Financial Literacy**

- Three employees partnered with three nonprofits to provide financial literacy training to LMI individuals.

**NONMETROPOLITAN / METROPOLITAN AREAS**  
*(Limited-scope Review)*

**DESCRIPTION OF INSTITUTION'S OPERATIONS**

- **Nonmetropolitan Ohio**
  - As of December 31, 2023, Richwood operated three branches, representing 33.3% of its total branches.
  - As of June 30, 2023, Richwood had \$113.8 million in deposits in this AA, representing a market share of 3.5%.
- **Springfield MSA**
  - As of December 31, 2023, Richwood operated two branches, representing 22.2% of its total branches.
  - As of June 30, 2023, Richwood had \$101.8 million in deposits in this AA, representing a market share of 5.1%.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

Using available facts and data, including performance and demographic information, the AA's performance was evaluated and compared with Richwood's overall performance. The conclusions regarding performance are provided in the tables below. Refer to the tables in Appendix C for information regarding these areas.

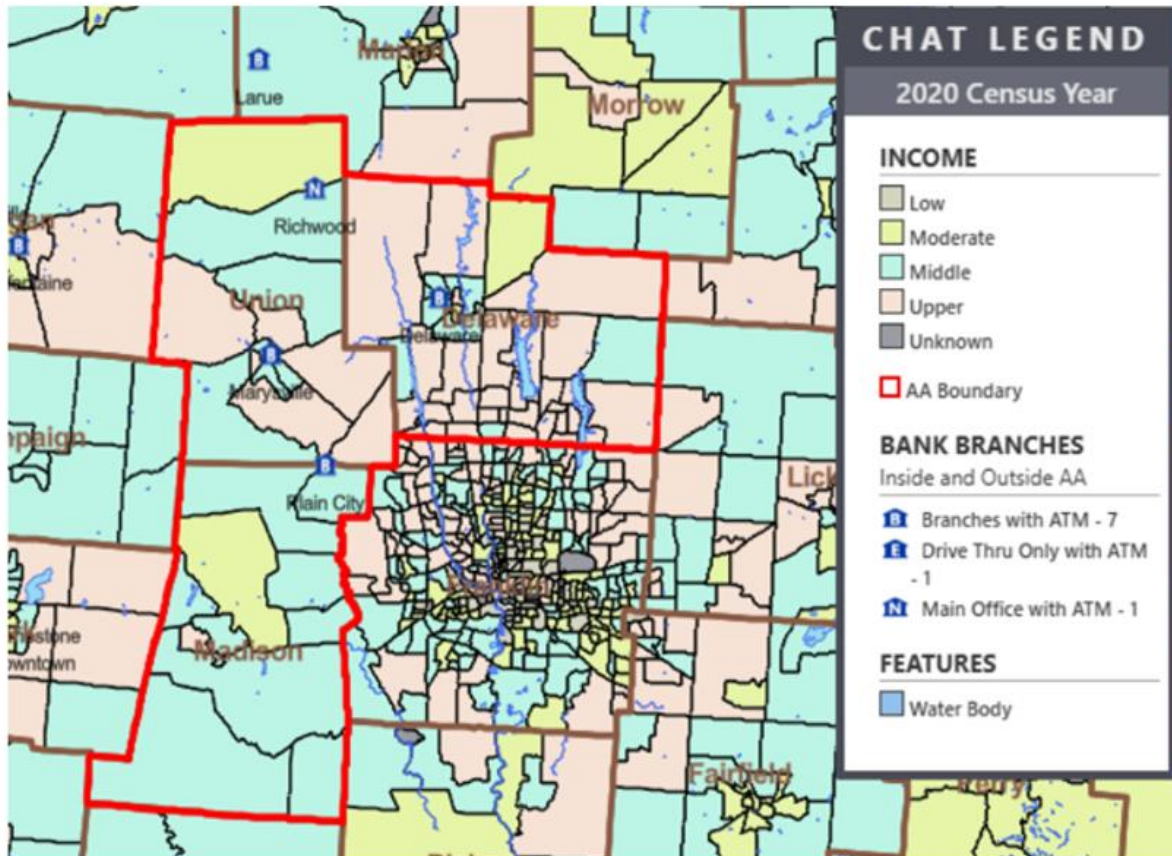
Assessment Area	Lending Test	Community Development Test
Nonmetropolitan Ohio	Below	Consistent
Springfield MSA	Below	Consistent
<i>The performance in the limited-scope AAs did not impact the overall rating</i>		

For the lending test, Richwood received an Outstanding rating. Performance in Nonmetropolitan Ohio and the Springfield MSA is below Richwood's overall performance. Borrower distribution is reasonable, and geographic distribution is excellent in both AAs. There was insufficient loan volume to evaluate small business, consumer, and home equity lending in either of these AAs.

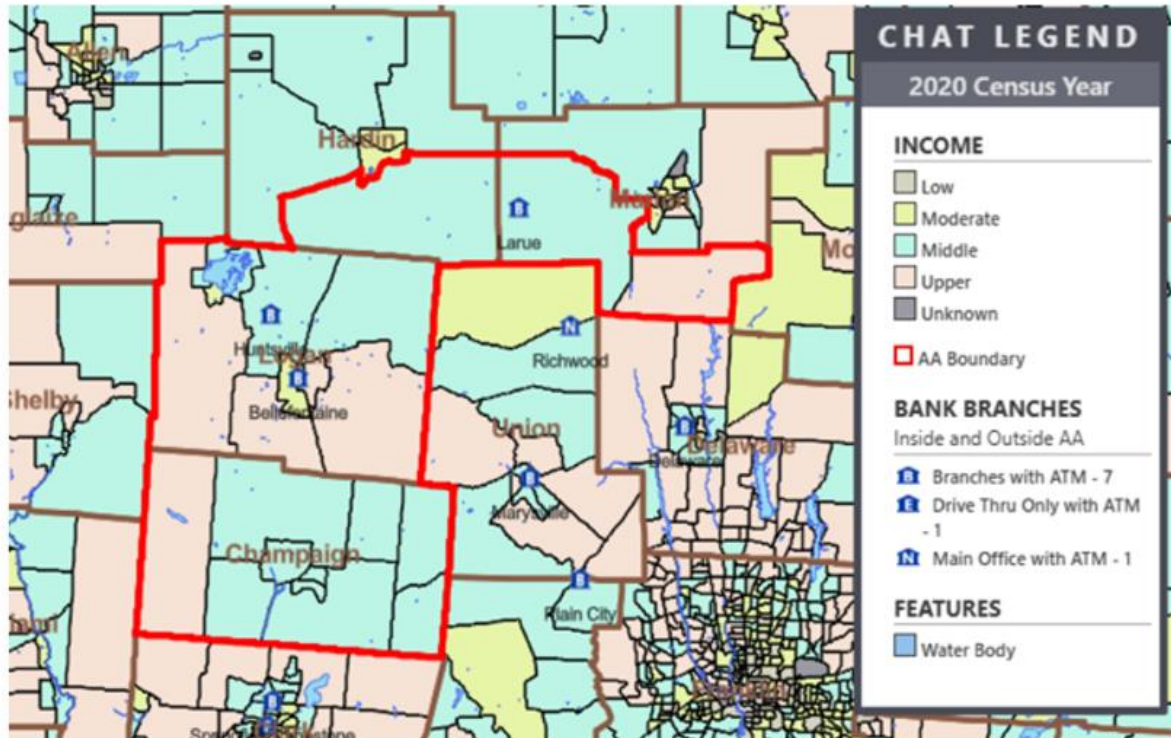
For the community development test, Richwood received an Outstanding rating. Performance in Nonmetropolitan Ohio and the Springfield MSA is consistent with Richwood's overall performance. These levels of performance are primarily due to the occasional use of complex investments in these AAs relative to Richwood's operational presence in the AAs.

## Appendix A – Assessment Area Maps

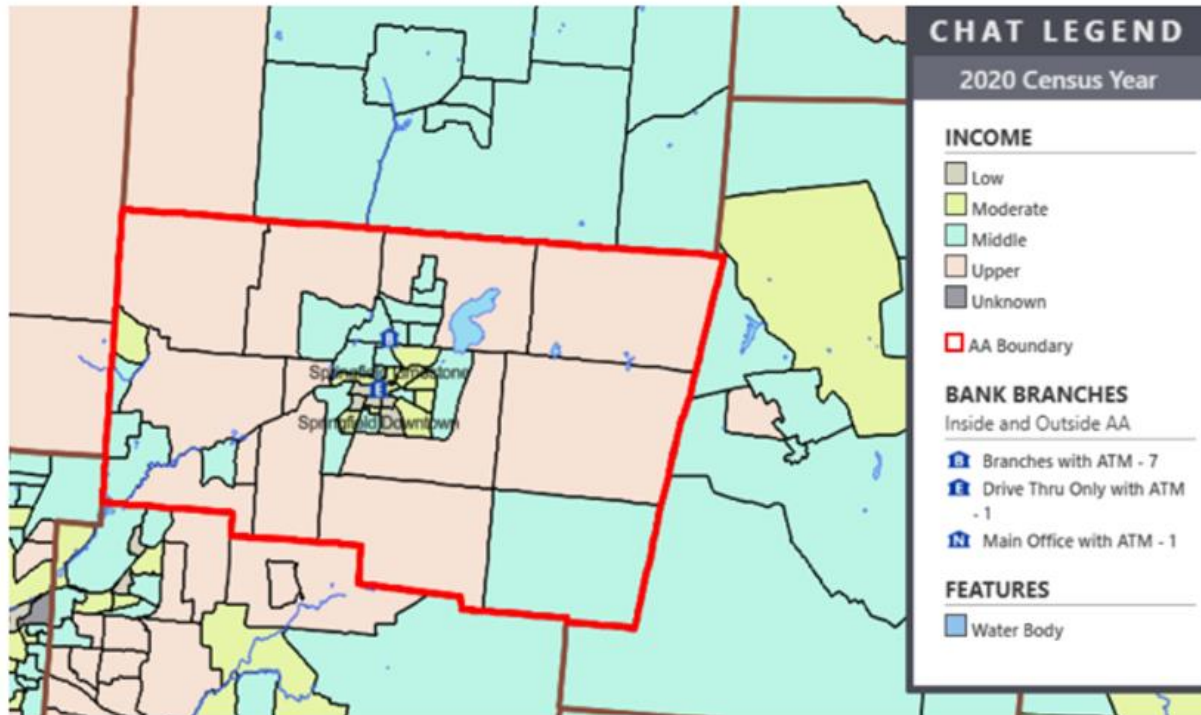
Columbus OH MSA (2022-2023)



Nonmetropolitan Ohio (2022-2023)



Springfield OH MSA (2022-2023)



## Appendix B – Demographic Tables

### Combined Demographics Report - 2023

#### Assessment Area: Columbus OH MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	8,717	10.9%
Moderate-income	4	6.2%	3,643	4.5%	376	10.3%	9,878	12.3%
Middle-income	25	38.5%	25,374	31.7%	1,384	5.5%	13,783	17.2%
Upper-income	36	55.4%	51,109	63.8%	1,131	2.2%	47,748	59.6%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	65	100.0%	80,126	100.0%	2,891	3.6%	80,126	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Moderate-income	5,601	3,426	4.0%	61.2%	1,757	31.4%	418	7.5%
Middle-income	40,519	27,135	31.8%	67.0%	10,906	26.9%	2,478	6.1%
Upper-income	66,533	54,751	64.2%	82.3%	9,258	13.9%	2,524	3.8%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total	112,653	85,312	100.0%	75.7%	21,921	19.5%	5,420	4.8%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	373	2.7%	346	2.8%	19	2.0%	8	4.3%
Middle-income	3,597	26.4%	3,296	26.4%	246	26.2%	55	29.4%
Upper-income	9,634	70.8%	8,835	70.8%	675	71.8%	124	66.3%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	13,604	100.0%	12,477	100.0%	940	100.0%	187	100.0%
	Percentage of Total Businesses:		91.7%		6.9%		1.4%	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	32	7.4%	32	7.4%	0	0.0%	0	0.0%
Middle-income	202	46.4%	201	46.6%	1	25.0%	0	0.0%
Upper-income	201	46.2%	198	45.9%	3	75.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	435	100.0%	431	100.0%	4	100.0%	0	0.0%
	Percentage of Total Farms:		99.1%		0.9%		0.0%	

Based on 2023 FFIEC Census Data and 2023 D&B information

### Combined Demographics Report - 2022

#### Assessment Area: Columbus OH MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	7,689	10.2%
Moderate-income	4	6.8%	3,643	4.8%	376	10.3%	8,962	11.9%
Middle-income	20	33.9%	20,774	27.5%	1,160	5.6%	12,657	16.8%
Upper-income	35	59.3%	51,090	67.7%	1,131	2.2%	46,199	61.2%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	59	100.0%	75,507	100.0%	2,667	3.5%	75,507	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Moderate-income	5,601	3,426	4.3%	61.2%	1,757	31.4%	418	7.5%
Middle-income	32,467	22,226	27.7%	68.5%	8,427	26.0%	1,814	5.6%
Upper-income	66,387	54,729	68.1%	82.4%	9,158	13.8%	2,500	3.8%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total	104,455	80,381	100.0%	77.0%	19,342	18.5%	4,732	4.5%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	367	2.9%	339	2.9%	19	2.2%	9	5.1%
Middle-income	2,935	23.0%	2,686	22.9%	208	23.7%	41	23.2%
Upper-income	9,482	74.2%	8,705	74.2%	650	74.1%	127	71.8%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	12,784	100.0%	11,730	100.0%	877	100.0%	177	100.0%
	Percentage of Total Businesses:		91.8%			6.9%		1.4%
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	33	8.5%	33	8.6%	0	0.0%	0	0.0%
Middle-income	151	39.0%	150	39.2%	1	25.0%	0	0.0%
Upper-income	203	52.5%	200	52.2%	3	75.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	387	100.0%	383	100.0%	4	100.0%	0	0.0%
	Percentage of Total Farms:		99.0%			1.0%		0.0%

Based on 2022 FFIEC Census Data and 2022 D&B Information



### Combined Demographics Report

#### Assessment Area: Nonmetropolitan Ohio

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	3,946	14.3%
Moderate-income	2	8.3%	1,572	5.7%	319	20.3%	4,821	17.5%
Middle-income	16	66.7%	16,414	59.6%	1,170	7.1%	6,668	24.2%
Upper-income	6	25.0%	9,561	34.7%	558	5.8%	12,112	44.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	24	100.0%	27,547	100.0%	2,047	7.4%	27,547	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Moderate-income	4,076	1,511	4.9%	37.1%	1,481	36.3%	1,084	26.6%
Middle-income	28,392	18,119	59.3%	63.8%	5,607	19.7%	4,666	16.4%
Upper-income	14,493	10,907	35.7%	75.3%	2,280	15.7%	1,306	9.0%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total	46,961	30,537	100.0%	65.0%	9,368	19.9%	7,056	15.0%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	211	6.8%	184	6.6%	22	10.3%	5	6.3%
Middle-income	2,010	64.8%	1,835	65.3%	129	60.3%	46	58.2%
Upper-income	880	28.4%	789	28.1%	63	29.4%	28	35.4%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3,101	100.0%	2,808	100.0%	214	100.0%	79	100.0%
	Percentage of Total Businesses:			90.6%		6.9%		2.5%
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	1	0.3%	1	0.3%	0	0.0%	0	0.0%
Middle-income	231	61.4%	226	61.4%	1	25.0%	4	100.0%
Upper-income	144	38.3%	141	38.3%	3	75.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	376	100.0%	368	100.0%	4	100.0%	4	100.0%
	Percentage of Total Farms:			97.9%		1.1%		1.1%

Based on 2023 FFIEC Census Data and 2023 D&B Information



### Combined Demographics Report

Assessment Area: Springfield OH MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	5	11.1%	2,381	6.7%	845	35.5%	7,192	20.3%
Moderate-income	10	22.2%	6,853	19.4%	1,463	21.3%	6,138	17.4%
Middle-income	18	40.0%	14,463	40.9%	1,193	8.2%	7,691	21.8%
Upper-income	12	26.7%	11,657	33.0%	419	3.6%	14,333	40.5%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	45	100.0%	35,354	100.0%	3,920	11.1%	35,354	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	5,310	1,631	4.4%	30.7%	2,551	48.0%	1,128	21.2%
Moderate-income	12,752	5,375	14.6%	42.2%	5,719	44.8%	1,658	13.0%
Middle-income	26,128	15,780	42.8%	60.4%	7,940	30.4%	2,408	9.2%
Upper-income	17,093	14,047	38.1%	82.2%	1,819	10.6%	1,227	7.2%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total	61,283	36,833	100.0%	60.1%	18,029	29.4%	6,421	10.5%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	222	5.6%	196	5.5%	26	7.5%	0	0.0%
Moderate-income	864	21.9%	752	21.2%	105	30.2%	7	14.3%
Middle-income	1,587	40.2%	1,459	41.1%	110	31.6%	18	36.7%
Upper-income	1,277	32.3%	1,146	32.3%	107	30.7%	24	49.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3,950	100.0%	3,553	100.0%	348	100.0%	49	100.0%
	Percentage of Total Businesses:			89.9%		8.8%		1.2%
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1	0.7%	1	0.8%	0	0.0%	0	0.0%
Moderate-income	1	0.7%	1	0.8%	0	0.0%	0	0.0%
Middle-income	27	19.9%	27	20.5%	0	0.0%	0	0.0%
Upper-income	107	78.7%	103	78.0%	4	100.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	136	100.0%	132	100.0%	4	100.0%	0	0.0%
	Percentage of Total Farms:			97.1%		2.9%		0.0%

Based on 2023 FFIEC Census Data and 2023 D&B Information

## Appendix C –Lending Tables

### HMDA Lending Tables

#### Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: Columbus OH MSA

PRODUCT TYPE	Borrower Income Levels	Bank & Aggregate Lending; Demographic Data											
		2022						2023					
		Count		Dollar		Families by Family Income		Count		Dollar		Families by Family Income	
		Bank	Agg	Bank	Agg			Bank	Agg	Bank	Agg		
		#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	2	3.8%	2.4%	396	2.6%	1.0%	2	7.7%	2.6%	460	7.1%	0.9%
	Moderate	13	24.5%	9.3%	2,508	16.4%	5.5%	5	19.2%	10.2%	1,107	17.2%	5.7%
	Middle	9	17.0%	20.0%	2,141	14.0%	16.5%	6	23.1%	18.9%	1,372	21.3%	15.1%
	Upper	18	34.0%	50.8%	7,882	51.6%	60.5%	8	30.8%	50.6%	2,331	36.2%	61.6%
	Unknown	11	20.8%	17.5%	2,339	15.3%	16.5%	5	19.2%	17.7%	1,175	18.2%	16.7%
	Total	53	100%	100%	15,266	100%	100%	26	100%	100%	6,445	100%	100%
REFINANCE	Low	9	22.0%	6.0%	1,299	14.3%	3.0%	1	12.5%	5.7%	158	11.6%	2.3%
	Moderate	7	17.1%	15.0%	1,299	14.3%	10.1%	3	37.5%	14.2%	419	30.8%	7.4%
	Middle	12	29.3%	22.0%	2,945	32.5%	18.7%	4	50.0%	22.4%	785	57.6%	14.7%
	Upper	10	24.4%	47.1%	2,696	29.8%	56.9%	0	0.0%	49.6%	0	0.0%	43.5%
	Unknown	3	7.3%	9.9%	823	9.1%	11.3%	0	0.0%	8.1%	0	0.0%	32.1%
	Total	41	100%	100%	9,062	100%	100%	8	100%	100%	1,362	100%	100%
HOME IMPROVEMENT	Low	2	100.0%	2.3%	94	100.0%	1.2%	0	0.0%	4.9%	0	0.0%	2.5%
	Moderate	0	0.0%	8.6%	0	0.0%	5.4%	0	0.0%	9.6%	0	0.0%	6.0%
	Middle	0	0.0%	19.8%	0	0.0%	15.3%	0	0.0%	19.8%	0	0.0%	14.9%
	Upper	0	0.0%	67.6%	0	0.0%	75.6%	2	66.7%	63.7%	180	60.0%	74.4%
	Unknown	0	0.0%	1.6%	0	0.0%	2.5%	1	33.3%	2.0%	120	40.0%	2.3%
	Total	2	100%	100%	94	100%	100%	3	100%	100%	300	100%	100%
MULTI FAMILY	Low	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	3.8%	0	0.0%	0.5%	0	0.0%	4.0%	0	0.0%	0.1%
	Unknown	2	100.0%	96.2%	5,763	100.0%	99.5%	0	0.0%	96.0%	0	0.0%	99.9%
	Total	2	100%	100%	5,763	100%	100%	0	0.0%	100%	0	0.0%	100%
OTHER PURPOSE LOC	Low	0	0.0%	1.7%	0	0.0%	1.1%	0	0.0%	4.2%	0	0.0%	1.9%
	Moderate	0	0.0%	11.0%	0	0.0%	7.6%	0	0.0%	11.6%	0	0.0%	6.8%
	Middle	0	0.0%	20.1%	0	0.0%	16.6%	0	0.0%	20.2%	0	0.0%	14.2%
	Upper	0	0.0%	64.1%	0	0.0%	71.9%	0	0.0%	61.5%	0	0.0%	75.6%
	Unknown	0	0.0%	3.1%	0	0.0%	2.8%	0	0.0%	2.5%	0	0.0%	1.5%
	Total	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%

Originations & Purchases

Based on 2022 & 2023 FFIEC Census Data; 2016-2020 ACS data

**Borrower Distribution of HMDA Loans - Table 2 of 2**

Assessment Area: Columbus OH MSA

PRODUCT TYPE	Borrower Income Levels	Bank & Aggregate Lending; Demographic Data													
		2022							2023						
		Count			Dollar			Families by Family Income	Count			Dollar			Families by Family Income
		Bank	Agg		Bank	Agg			Bank	Agg		Bank	Agg		
#	%	%	\$ (000s)	\$ %	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	%		
OTHER PURPOSE CLOSED/EXEMPT	Low	1	20.0%	5.9%	27	4.9%	4.7%	10.2%	0	0.0%	3.4%	0	0.0%	2.4%	10.9%
	Moderate	2	40.0%	13.3%	31	5.6%	8.6%	11.9%	3	37.5%	18.2%	231	30.0%	13.1%	12.3%
	Middle	0	0.0%	14.5%	0	0.0%	10.5%	16.8%	2	25.0%	25.7%	220	28.6%	17.5%	17.2%
	Upper	2	40.0%	62.7%	496	89.5%	72.1%	61.2%	3	37.5%	49.2%	318	41.4%	63.6%	59.6%
	Unknown	0	0.0%	3.5%	0	0.0%	4.0%	0.0%	0	0.0%	3.4%	0	0.0%	3.3%	0.0%
	Total	5	100%	100%	554	100%	100%	100%	8	100%	100%	769	100%	100%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0.0%	0	0.0%	0.0%	10.2%	0	0.0%	0.0%	0	0.0%	0.0%	10.9%
	Moderate	0	0.0%	2.2%	0	0.0%	1.2%	11.9%	0	0.0%	0.0%	0	0.0%	0.0%	12.3%
	Middle	0	0.0%	6.7%	0	0.0%	5.0%	16.8%	0	0.0%	0.0%	0	0.0%	0.0%	17.2%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	61.2%	0	0.0%	0.0%	0	0.0%	0.0%	59.6%
	Unknown	0	0.0%	91.1%	0	0.0%	93.8%	0.0%	0	0.0%	100.0%	0	0.0%	100.0%	0.0%
	Total	0	0.0%	100%	0	0.0%	100%	100%	0	0.0%	100%	0	0.0%	100%	100%
HMDA TOTALS	Low	14	13.6%	3.4%	1,816	5.9%	1.4%	10.2%	3	6.7%	3.6%	618	7.0%	1.2%	10.9%
	Moderate	22	21.4%	10.9%	3,838	12.5%	6.3%	11.9%	11	24.4%	11.1%	1,757	19.8%	5.6%	12.3%
	Middle	21	20.4%	20.3%	5,086	16.5%	15.9%	16.8%	12	26.7%	19.8%	2,377	26.8%	14.0%	17.2%
	Upper	30	29.1%	52.8%	11,074	36.0%	57.3%	61.2%	13	28.9%	52.5%	2,829	31.9%	55.6%	59.6%
	Unknown	16	15.5%	12.5%	8,925	29.0%	19.1%	0.0%	6	13.3%	13.1%	1,295	14.6%	23.6%	0.0%
	Total	103	100%	100%	30,739	100%	100%	100%	45	100%	100%	8,876	100%	100%	100%

Originations & Purchases

Based on 2022 & 2023 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: Columbus OH MSA

PRODUCT TYPE	Tract Income Levels	Bank & Aggregate Lending; Demographic Data														
		2022							2023							
		Count			Dollar			Owner Occupied Units %	Count			Dollar			Owner Occupied Units %	
		Bank #	%	Agg %	Bank \$ (000s)	\$ %	Agg \$ %		Bank #	%	Agg %	Bank \$ (000s)	\$ %	Agg \$ %		
HOME PURCHASE	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	
	Moderate	4	7.5%	2.5%	982	6.4%	1.6%	4.3%	3	11.5%	2.1%	495	7.7%	1.3%	4.0%	
	Middle	23	43.4%	26.9%	4,491	29.4%	21.1%	27.7%	14	53.8%	33.4%	3,436	53.3%	25.5%	31.8%	
	Upper	26	49.1%	70.6%	9,793	64.1%	77.2%	68.1%	9	34.6%	64.5%	2,514	39.0%	73.2%	64.2%	
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	
	Total	53	100%	100%	15,266	100%	100%	100%	26	100%	100%	6,445	100%	100%	100%	
REFINANCE	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	
	Moderate	5	12.2%	2.8%	998	11.0%	1.8%	4.3%	0	0.0%	3.3%	0	0.0%	2.2%	4.0%	
	Middle	14	34.1%	26.0%	2,779	30.7%	19.3%	27.7%	3	37.5%	31.1%	522	38.3%	19.1%	31.8%	
	Upper	22	53.7%	71.1%	5,285	58.3%	78.9%	68.1%	5	62.5%	65.6%	840	61.7%	78.7%	64.2%	
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	
	Total	41	100%	100%	9,062	100%	100%	100%	8	100%	100%	1,362	100%	100%	100%	
HOME IMPROVEMENT	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	
	Moderate	1	50.0%	1.2%	24	25.5%	0.6%	4.3%	0	0.0%	2.3%	0	0.0%	1.4%	4.0%	
	Middle	1	50.0%	20.3%	70	74.5%	15.0%	27.7%	2	66.7%	27.6%	200	66.7%	21.3%	31.8%	
	Upper	0	0.0%	78.5%	0	0.0%	84.3%	68.1%	1	33.3%	70.2%	100	33.3%	77.3%	64.2%	
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	
	Total	2	100%	100%	94	100%	100%	100%	3	100%	100%	300	100%	100%	100%	
MULTI FAMILY							Multi-Family Units								Multi-Family Units	
	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	
	Moderate	0	0.0%	19.2%	0	0.0%	3.9%	5.0%	0	0.0%	8.0%	0	0.0%	0.4%	4.5%	
	Middle	0	0.0%	46.2%	0	0.0%	40.8%	38.6%	0	0.0%	28.0%	0	0.0%	3.8%	44.2%	
	Upper	2	100.0%	34.6%	5,763	100.0%	55.3%	56.3%	0	0.0%	64.0%	0	0.0%	95.8%	51.3%	
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	
Total	2	100%	100%	5,763	100%	100%	100%	0	0.0%	100%	0	0.0%	100%	100%		
OTHER PURPOSE	LOC	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	1.6%	0	0.0%	1.0%	4.3%	0	0.0%	2.1%	0	0.0%	1.5%	4.0%	
	Middle	0	0.0%	20.2%	0	0.0%	14.6%	27.7%	0	0.0%	25.5%	0	0.0%	17.7%	31.8%	
	Upper	0	0.0%	78.2%	0	0.0%	84.4%	68.1%	0	0.0%	72.4%	0	0.0%	80.8%	64.2%	
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	
	Total	0	0.0%	100%	0	0.0%	100%	100%	0	0.0%	100%	0	0.0%	100%	100%	

Originations & Purchases

Based on 2022 & 2023 FFIEC Census Data; 2016-2020 ACS data

**Geographic Distribution of HMDA Loans - Table 2 of 2**

Assessment Area: Columbus OH MSA

PRODUCT TYPE	Tract Income Levels	Bank & Aggregate Lending; Demographic Data															
		2022							2023								
		Count			Dollar				Owner Occupied Units	Count			Dollar				Owner Occupied Units
		Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg				
#	%	%	\$ (000s)	\$ %	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	%				
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%		
	Moderate	0	0.0%	1.2%	0	0.0%	0.6%	4.3%	1	12.5%	1.3%	85	11.1%	0.6%	4.0%		
	Middle	3	60.0%	23.5%	58	10.5%	16.5%	27.7%	3	37.5%	30.4%	275	35.8%	20.0%	31.8%		
	Upper	2	40.0%	75.3%	496	89.5%	83.0%	68.1%	4	50.0%	68.3%	409	53.2%	79.4%	64.2%		
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%		
	Total	5	100%	100%	554	100%	100%	100%	8	100%	100%	769	100%	100%	100%		
PURPOSE NOT APPLICABLE	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%		
	Moderate	0	0.0%	4.4%	0	0.0%	3.4%	4.3%	0	0.0%	3.3%	0	0.0%	1.7%	4.0%		
	Middle	0	0.0%	37.8%	0	0.0%	29.9%	27.7%	0	0.0%	36.7%	0	0.0%	36.4%	31.8%		
	Upper	0	0.0%	57.8%	0	0.0%	66.7%	68.1%	0	0.0%	60.0%	0	0.0%	61.9%	64.2%		
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%		
	Total	0	0.0%	100%	0	0.0%	100%	100%	0	0.0%	100%	0	0.0%	100%	100%		
HMDA TOTALS	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%		
	Moderate	10	9.7%	2.4%	2,004	6.5%	1.7%	4.3%	4	8.9%	2.3%	580	6.5%	1.4%	4.0%		
	Middle	41	39.8%	25.4%	7,398	24.1%	21.4%	27.7%	22	48.9%	31.6%	4,433	49.9%	22.7%	31.8%		
	Upper	52	50.5%	72.3%	21,337	69.4%	76.9%	68.1%	19	42.2%	66.0%	3,863	43.5%	76.0%	64.2%		
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%		
	Total	103	100%	100%	30,739	100%	100%	100%	45	100%	100%	8,876	100%	100%	100%		

Originations & Purchases

Based on 2022 & 2023 FFIEC Census Data; 2016-2020 ACS data

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: Nonmetropolitan Ohio

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022					2023						
		Bank				Families by Family Income %	Count			Dollar		Count			Dollar			
		Count		Dollar			Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$(000s)	\$ %	#	%	%									\$(000s)	\$ %	\$ %	#
HOME PURCHASE	Low	3	8.3%	340	5.9%	14.3%	1	3.7%	6.0%	154	3.4%	3.5%	2	22.2%	5.6%	186	16.0%	3.0%
	Moderate	7	19.4%	910	15.8%	17.5%	5	18.5%	22.4%	778	16.9%	16.4%	2	22.2%	20.0%	132	11.3%	13.7%
	Middle	8	22.2%	1,012	17.6%	24.2%	5	18.5%	24.5%	543	11.8%	22.6%	3	33.3%	25.6%	469	40.3%	24.2%
	Upper	14	38.9%	2,752	47.8%	44.0%	12	44.4%	29.6%	2,376	51.7%	40.1%	2	22.2%	29.6%	376	32.3%	41.0%
	Unknown	4	11.1%	741	12.9%	0.0%	4	14.8%	17.5%	741	16.1%	17.4%	0	0.0%	19.1%	0	0.0%	18.1%
	Total	36	100%	5,755	100%	100.0%	27	100%	100%	4,532	100%	100%	9	100%	100%	1,163	100%	100%
REFINANCE	Low	1	5.6%	85	3.0%	14.3%	0	0.0%	10.2%	0	0.0%	6.0%	1	20.0%	8.1%	85	12.7%	5.2%
	Moderate	6	33.3%	738	26.3%	17.5%	5	38.5%	24.4%	681	31.8%	18.0%	1	20.0%	21.0%	57	8.5%	16.9%
	Middle	4	22.2%	925	32.9%	24.2%	3	23.1%	28.3%	685	32.0%	28.8%	1	20.0%	25.7%	240	35.9%	23.9%
	Upper	4	22.2%	476	16.9%	44.0%	3	23.1%	29.2%	333	15.6%	36.9%	1	20.0%	35.1%	143	21.4%	39.7%
	Unknown	3	16.7%	585	20.8%	0.0%	2	15.4%	8.0%	441	20.6%	10.3%	1	20.0%	10.1%	144	21.5%	14.3%
	Total	18	100%	2,809	100%	100.0%	13	100%	100%	2,140	100%	100%	5	100%	100%	669	100%	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	14.3%	0	0.0%	9.0%	0	0.0%	6.2%	0	0.0%	6.3%	0	0.0%	4.4%
	Moderate	0	0.0%	0	0.0%	17.5%	0	0.0%	16.2%	0	0.0%	14.0%	0	0.0%	20.7%	0	0.0%	15.5%
	Middle	2	66.7%	85	37.8%	24.2%	1	100.0%	26.6%	25	100.0%	21.5%	1	50.0%	27.0%	60	30.0%	25.8%
	Upper	1	33.3%	140	62.2%	44.0%	0	0.0%	45.0%	0	0.0%	54.0%	1	50.0%	45.0%	140	70.0%	53.8%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	3.2%	0	0.0%	4.3%	0	0.0%	0.9%	0	0.0%	0.6%
	Total	3	100%	225	100%	100.0%	1	100%	100%	25	100%	100%	2	100%	100%	200	100%	100%
MULTI FAMILY	Low	0	0.0%	0	0.0%	14.3%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	17.5%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	24.2%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	44.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	2	100.0%	1,789	100.0%	0.0%	1	100.0%	100.0%	1,300	100.0%	100.0%	1	100.0%	100.0%	489	100.0%	100.0%
	Total	2	100%	1,789	100%	100.0%	1	100%	100%	1,300	100%	100%	1	100%	100%	489	100%	100%
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	14.3%	0	0.0%	6.1%	0	0.0%	3.0%	0	0.0%	5.4%	0	0.0%	3.6%
	Moderate	0	0.0%	0	0.0%	17.5%	0	0.0%	14.9%	0	0.0%	12.4%	0	0.0%	23.1%	0	0.0%	16.2%
	Middle	0	0.0%	0	0.0%	24.2%	0	0.0%	32.4%	0	0.0%	27.7%	0	0.0%	25.4%	0	0.0%	25.4%
	Upper	0	0.0%	0	0.0%	44.0%	0	0.0%	43.9%	0	0.0%	55.8%	0	0.0%	43.8%	0	0.0%	52.2%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	2.7%	0	0.0%	1.2%	0	0.0%	2.3%	0	0.0%	2.5%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

**Borrower Distribution of HMDA Loans - Table 2 of 2**

Assessment Area: Nonmetropolitan Ohio

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022						2023					
		Bank				Families by Family Income %	Count			Dollar			Count			Dollar		
		Count	Dollar				Bank	Agg		Bank	Agg		Bank	Agg		Bank	Agg	
		#	%	\$(000s)	\$%	%	#	%	%	\$(000s)	\$%	\$%	#	%	%	\$(000s)	\$%	\$%
OTHER PURPOSE CLOSED/EXEMPT	Low	1	25.0%	64	14.5%	14.3%	1	33.3%	10.9%	64	23.1%	7.0%	0	0.0%	11.8%	0	0.0%	8.5%
	Moderate	0	0.0%	0	0.0%	17.5%	0	0.0%	8.7%	0	0.0%	6.8%	0	0.0%	17.6%	0	0.0%	12.0%
	Middle	1	25.0%	148	33.5%	24.2%	1	33.3%	30.4%	148	53.4%	23.6%	0	0.0%	27.5%	0	0.0%	36.1%
	Upper	2	50.0%	230	52.0%	44.0%	1	33.3%	37.0%	65	23.5%	46.2%	1	100.0%	37.3%	165	100.0%	39.6%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	13.0%	0	0.0%	16.5%	0	0.0%	5.9%	0	0.0%	3.9%
	Total	4	100%	442	100%	100.0%	3	100%	100%	277	100%	100%	1	100%	100%	165	100%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	14.3%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	17.5%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	24.2%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	44.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%
HMDA TOTALS	Low	5	7.9%	489	4.4%	14.3%	2	4.4%	7.7%	218	2.6%	4.0%	3	16.7%	6.4%	271	10.1%	3.5%
	Moderate	13	20.6%	1,648	15.0%	17.5%	10	22.2%	21.6%	1,459	17.5%	15.2%	3	16.7%	20.3%	189	7.0%	14.0%
	Middle	15	23.8%	2,170	19.7%	24.2%	10	22.2%	26.2%	1,401	16.8%	22.5%	5	27.8%	25.6%	769	28.6%	23.7%
	Upper	21	33.3%	3,598	32.6%	44.0%	16	35.6%	31.4%	2,774	33.3%	36.8%	5	27.8%	33.3%	824	30.7%	40.3%
	Unknown	9	14.3%	3,115	28.3%	0.0%	7	15.6%	13.1%	2,482	29.8%	21.4%	2	11.1%	14.3%	633	23.6%	18.5%
	Total	63	100%	11,020	100%	100.0%	45	100%	100%	8,334	100%	100%	18	100%	100%	2,696	100%	100%

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: Nonmetropolitan Ohio

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending									
		2022, 2023					2022					2023				
		Bank				Owner Occupied Units %	Count			Dollar		Count			Dollar	
		Count	Dollar				Bank	Agg		Bank	Agg	Bank	Agg		Bank	Agg
		#	%	\$(000s)	\$ %		#	%	%	\$(000s)	\$ %	#	%	%	\$(000s)	\$ %
HOME PURCHASE	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%	0.0%	0	0.0%
	Moderate	3	8.3%	451	7.8%	4.9%	3	11.1%	6.6%	451	9.8%	0	0.0%	9.5%	0	0.0%
	Middle	24	66.7%	3,946	68.6%	59.3%	18	66.7%	63.5%	3,072	66.9%	6	66.7%	58.8%	874	75.2%
	Upper	9	25.0%	1,358	23.6%	35.7%	6	22.2%	29.9%	1,069	23.3%	3	33.3%	31.7%	289	24.8%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%	0.0%	0	0.0%
	Total	36	100%	5,755	100%	100.0%	27	100%	100%	4,532	100%	9	100%	100%	1,163	100%
REFINANCE	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%	0.0%	0	0.0%
	Moderate	1	5.6%	144	5.1%	4.9%	0	0.0%	6.2%	0	0.0%	1	20.0%	4.9%	144	21.5%
	Middle	11	61.1%	1,692	60.2%	59.3%	7	53.8%	55.9%	1,167	54.5%	4	80.0%	58.1%	525	78.5%
	Upper	6	33.3%	973	34.6%	35.7%	6	46.2%	37.9%	973	45.5%	0	0.0%	37.1%	0	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%	0.0%	0	0.0%
	Total	18	100%	2,809	100%	100.0%	13	100%	100%	2,140	100%	5	100%	100%	669	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	4.9%	0	0.0%	4.7%	0	0.0%	0	0.0%	5.0%	0	0.0%
	Middle	2	66.7%	200	88.9%	59.3%	0	0.0%	57.2%	0	0.0%	2	100.0%	58.6%	200	100.0%
	Upper	1	33.3%	25	11.1%	35.7%	1	100.0%	38.1%	25	100.0%	0	0.0%	36.5%	0	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%	0.0%	0	0.0%
	Total	3	100%	225	100%	100.0%	1	100%	100%	25	100%	2	100%	100%	200	100%
MULTI FAMILY	Multi-Family Units															
	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%	0.0%	0	0.0%
	Moderate	1	50.0%	1,300	72.7%	28.4%	1	100.0%	23.1%	1,300	100.0%	0	0.0%	0.0%	0	0.0%
	Middle	1	50.0%	489	27.3%	45.9%	0	0.0%	46.2%	0	0.0%	1	100.0%	83.3%	489	100.0%
	Upper	0	0.0%	0	0.0%	25.7%	0	0.0%	30.8%	0	0.0%	0	0.0%	16.7%	0	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%	0.0%	0	0.0%
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	4.9%	0	0.0%	6.8%	0	0.0%	0	0.0%	7.7%	0	0.0%
	Middle	0	0.0%	0	0.0%	59.3%	0	0.0%	64.9%	0	0.0%	0	0.0%	60.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	35.7%	0	0.0%	28.4%	0	0.0%	0	0.0%	32.3%	0	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%	0.0%	0	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	0	0.0%	100%	0	0.0%

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data



Geographic Distribution of HMDA Loans - Table 2 of 2  
Assessment Area: Nonmetropolitan Ohio

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022					2023						
		Bank				Owner Occupied Units %	Count			Dollar			Count			Dollar		
		Count		Dollar			Bank	Agg	%	Bank	Agg	%	Bank	Agg	%	Bank	Agg	%
#	%	\$ (000s)	\$ %	#	%	\$ (000s)												
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	1	25.0%	65	14.7%	4.9%	1	33.3%	10.9%	65	23.5%	13.2%	0	0.0%	3.9%	0	0.0%	3.7%
	Middle	3	75.0%	377	85.3%	59.3%	2	66.7%	47.8%	212	76.5%	55.6%	1	100.0%	58.8%	165	100.0%	64.0%
	Upper	0	0.0%	0	0.0%	35.7%	0	0.0%	41.3%	0	0.0%	31.2%	0	0.0%	37.3%	0	0.0%	32.3%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	4	100%	442	100%	100.0%	3	100%	100%	277	100%	100%	1	100%	100%	165	100%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	4.9%	0	0.0%	8.3%	0	0.0%	8.9%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	59.3%	0	0.0%	58.3%	0	0.0%	59.9%	0	0.0%	72.7%	0	0.0%	75.4%
	Upper	0	0.0%	0	0.0%	35.7%	0	0.0%	33.3%	0	0.0%	31.1%	0	0.0%	27.3%	0	0.0%	24.6%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%
HMDA TOTALS	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	6	9.5%	1,960	17.8%	4.9%	5	11.1%	6.5%	1,816	21.8%	5.8%	1	5.6%	7.6%	144	5.4%	6.6%
	Middle	41	65.1%	6,704	60.8%	59.3%	27	60.0%	60.0%	4,451	53.4%	60.7%	14	77.8%	58.8%	2,253	83.9%	60.4%
	Upper	16	25.4%	2,356	21.4%	35.7%	13	28.9%	33.5%	2,067	24.8%	33.5%	3	16.7%	33.6%	289	10.8%	33.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	63	100%	11,020	100%	100.0%	45	100%	100%	8,334	100%	100%	18	100%	100%	2,686	100%	100%

Originations & Purchases  
Based on 2023 FFIEC Census Data; 2016-2020 ACS data

**Borrower Distribution of HMDA Loans - Table 1 of 2**  
Assessment Area: Springfield OH MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022					2023						
		Bank				Families by Family Income %	Count		Dollar			Count		Dollar				
		Count	Dollar				Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$(000s)	\$ %	#	%	%									\$(000s)	\$ %	#	%
HOME PURCHASE	Low	3	25.0%	147	8.6%	20.3%	2	25.0%	6.8%	75	5.7%	3.7%	1	25.0%	10.7%	72	18.7%	5.8%
	Moderate	0	0.0%	0	0.0%	17.4%	0	0.0%	23.8%	0	0.0%	17.8%	0	0.0%	24.6%	0	0.0%	19.5%
	Middle	1	8.3%	82	4.8%	21.8%	1	12.5%	23.0%	82	6.2%	23.3%	0	0.0%	21.4%	0	0.0%	21.7%
	Upper	2	16.7%	602	35.3%	40.5%	1	12.5%	26.1%	479	36.3%	36.2%	1	25.0%	21.5%	123	31.9%	31.5%
	Unknown	6	50.0%	874	51.3%	0.0%	4	50.0%	20.2%	684	51.8%	19.1%	2	50.0%	21.8%	190	49.4%	21.6%
	Total	12	100%	1,705	100%	100.0%	8	100%	100%	1,320	100%	100%	4	100%	100%	385	100%	100%
REFINANCE	Low	0	0.0%	0	0.0%	20.3%	0	0.0%	8.6%	0	0.0%	5.1%	0	0.0%	12.5%	0	0.0%	7.3%
	Moderate	3	25.0%	236	16.8%	17.4%	3	25.0%	23.1%	236	16.8%	17.7%	0	0.0%	24.7%	0	0.0%	23.5%
	Middle	5	41.7%	409	29.1%	21.8%	5	41.7%	26.1%	409	29.1%	25.1%	0	0.0%	23.4%	0	0.0%	23.7%
	Upper	4	33.3%	759	54.1%	40.5%	4	33.3%	32.2%	759	54.1%	41.2%	0	0.0%	24.6%	0	0.0%	29.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	10.0%	0	0.0%	10.9%	0	0.0%	14.9%	0	0.0%	16.4%
	Total	12	100%	1,404	100%	100.0%	12	100%	100%	1,404	100%	100%	0	0.0%	100%	0	0.0%	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	20.3%	0	0.0%	5.1%	0	0.0%	3.6%	0	0.0%	6.3%	0	0.0%	3.6%
	Moderate	0	0.0%	0	0.0%	17.4%	0	0.0%	16.4%	0	0.0%	15.2%	0	0.0%	22.3%	0	0.0%	16.6%
	Middle	0	0.0%	0	0.0%	21.8%	0	0.0%	28.7%	0	0.0%	26.5%	0	0.0%	28.0%	0	0.0%	25.3%
	Upper	0	0.0%	0	0.0%	40.5%	0	0.0%	47.2%	0	0.0%	51.6%	0	0.0%	39.3%	0	0.0%	49.8%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	2.5%	0	0.0%	3.1%	0	0.0%	3.6%	0	0.0%	4.7%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%
MULTI FAMILY	Low	0	0.0%	0	0.0%	20.3%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	17.4%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	21.8%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	40.5%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	4	100.0%	2,141	100.0%	0.0%	2	100.0%	100.0%	1,013	100.0%	100.0%	2	100.0%	100.0%	1,128	100.0%	100.0%
	Total	4	100%	2,141	100%	100.0%	2	100%	100%	1,013	100%	100%	2	100%	100%	1,128	100%	100%
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	20.3%	0	0.0%	8.0%	0	0.0%	7.5%	0	0.0%	11.5%	0	0.0%	6.8%
	Moderate	0	0.0%	0	0.0%	17.4%	0	0.0%	17.3%	0	0.0%	12.2%	0	0.0%	24.4%	0	0.0%	17.2%
	Middle	0	0.0%	0	0.0%	21.8%	0	0.0%	30.9%	0	0.0%	26.9%	0	0.0%	29.5%	0	0.0%	24.1%
	Upper	0	0.0%	0	0.0%	40.5%	0	0.0%	41.4%	0	0.0%	50.8%	0	0.0%	32.1%	0	0.0%	49.5%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	2.5%	0	0.0%	2.5%	0	0.0%	2.6%	0	0.0%	2.3%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

**Borrower Distribution of HMDA Loans - Table 2 of 2**  
Assessment Area: Springfield OH MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022						2023					
		Bank				Families by Family Income %	Count			Dollar			Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		#	%	\$(000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	20.3%	0	0.0%	7.5%	0	0.0%	5.7%	0	0.0%	10.8%	0	0.0%	8.8%
	Moderate	1	50.0%	30	54.5%	17.4%	0	0.0%	14.0%	0	0.0%	12.8%	1	100.0%	22.5%	30	100.0%	18.9%
	Middle	1	50.0%	25	45.5%	21.8%	1	100.0%	25.8%	25	100.0%	26.4%	0	0.0%	34.3%	0	0.0%	26.6%
	Upper	0	0.0%	0	0.0%	40.5%	0	0.0%	49.5%	0	0.0%	49.9%	0	0.0%	29.4%	0	0.0%	31.6%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	3.2%	0	0.0%	5.2%	0	0.0%	2.9%	0	0.0%	14.0%
	Total	2	100%	55	100%	100.0%	1	100%	100%	25	100%	100%	1	100%	100%	30	100%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	20.3%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	17.4%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	21.8%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	40.5%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%
HMDA TOTALS	Low	3	10.0%	147	2.8%	20.3%	2	8.7%	7.1%	75	2.0%	3.9%	1	14.3%	10.5%	72	4.7%	5.9%
	Moderate	4	13.3%	266	5.0%	17.4%	3	13.0%	21.9%	236	6.3%	16.5%	1	14.3%	24.0%	30	1.9%	19.6%
	Middle	7	23.3%	516	9.7%	21.8%	7	30.4%	24.5%	516	13.7%	22.7%	0	0.0%	23.1%	0	0.0%	22.0%
	Upper	6	20.0%	1,361	25.7%	40.5%	5	21.7%	30.9%	1,238	32.9%	36.6%	1	14.3%	24.7%	123	8.0%	31.9%
	Unknown	10	33.3%	3,015	56.8%	0.0%	6	26.1%	15.6%	1,697	45.1%	20.3%	4	57.1%	17.8%	1,318	85.4%	20.6%
	Total	30	100%	5,305	100%	100.0%	23	100%	100%	3,762	100%	100%	7	100%	100%	1,543	100%	100%

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: Springfield OH MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending												
		2022, 2023					2022					2023							
		Bank				Owner Occupied Units %	Count			Dollar			Count			Dollar			
		Count #	%	Dollar \$(000s)	%		Bank #	%	Agg %	Bank \$(000s)	%	Agg %	Bank #	%	Agg %	Bank \$(000s)	%	Agg %	
HOME PURCHASE	Low	1	8.3%	11	0.6%	4.4%	1	12.5%	2.3%	11	0.8%	0.9%	0	0.0%	3.4%	0	0.0%	1.7%	
	Moderate	2	16.7%	194	11.4%	14.6%	1	12.5%	21.4%	54	4.1%	13.7%	1	25.0%	21.2%	140	36.4%	14.4%	
	Middle	5	41.7%	481	28.2%	42.8%	2	25.0%	46.8%	236	17.9%	45.3%	3	75.0%	47.0%	245	63.6%	47.2%	
	Upper	4	33.3%	1,019	59.8%	38.1%	4	50.0%	29.5%	1,019	77.2%	40.1%	0	0.0%	28.4%	0	0.0%	36.7%	
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	
	Total	12	100%	1,705	100%	100.0%	8	100%	100%	1,320	100%	100%	4	100%	100%	365	100%	100%	
REFINANCE	Low	3	25.0%	147	10.5%	4.4%	3	25.0%	2.1%	147	10.5%	0.9%	0	0.0%	4.3%	0	0.0%	2.6%	
	Moderate	1	8.3%	93	6.6%	14.6%	1	8.3%	12.9%	93	6.6%	8.4%	0	0.0%	17.3%	0	0.0%	12.3%	
	Middle	4	33.3%	491	35.0%	42.8%	4	33.3%	43.3%	491	35.0%	39.7%	0	0.0%	40.7%	0	0.0%	39.7%	
	Upper	4	33.3%	673	47.9%	38.1%	4	33.3%	41.8%	673	47.9%	51.0%	0	0.0%	37.7%	0	0.0%	45.5%	
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	
	Total	12	100%	1,404	100%	100.0%	12	100%	100%	1,404	100%	100%	0	0.0%	100%	0	0.0%	100%	
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	4.4%	0	0.0%	1.6%	0	0.0%	1.4%	0	0.0%	0.6%	0	0.0%	0.6%	
	Moderate	0	0.0%	0	0.0%	14.6%	0	0.0%	12.3%	0	0.0%	9.2%	0	0.0%	13.1%	0	0.0%	8.1%	
	Middle	0	0.0%	0	0.0%	42.8%	0	0.0%	41.0%	0	0.0%	36.6%	0	0.0%	39.9%	0	0.0%	37.3%	
	Upper	0	0.0%	0	0.0%	38.1%	0	0.0%	45.1%	0	0.0%	52.8%	0	0.0%	46.4%	0	0.0%	54.1%	
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	
MULTI FAMILY	Low	0	0.0%	Multi-Family Units			0	0.0%	12.0%	0	0.0%	22.2%	0	0.0%	22.2%	0	0.0%	16.1%	
	Moderate	3	75.0%	1,271	59.4%	20.9%	2	100.0%	32.0%	1,013	100.0%	29.2%	1	50.0%	38.9%	258	22.9%	26.8%	
	Middle	0	0.0%	0	0.0%	68.0%	0	0.0%	48.0%	0	0.0%	43.9%	0	0.0%	22.2%	0	0.0%	28.3%	
	Upper	1	25.0%	870	40.6%	3.8%	0	0.0%	8.0%	0	0.0%	4.7%	1	50.0%	16.7%	870	77.1%	28.8%	
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	
	Total	4	100%	2,141	100%	100.0%	2	100%	100%	1,013	100%	100%	2	100%	100%	1,128	100%	100%	
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	4.4%	0	0.0%	1.2%	0	0.0%	0.5%	0	0.0%	1.9%	0	0.0%	0.7%	
	Moderate	0	0.0%	0	0.0%	14.6%	0	0.0%	8.6%	0	0.0%	5.4%	0	0.0%	12.2%	0	0.0%	6.2%	
	Middle	0	0.0%	0	0.0%	42.8%	0	0.0%	46.3%	0	0.0%	37.4%	0	0.0%	44.2%	0	0.0%	49.8%	
	Upper	0	0.0%	0	0.0%	38.1%	0	0.0%	43.8%	0	0.0%	56.7%	0	0.0%	41.7%	0	0.0%	43.3%	
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of HMDA Loans - Table 2 of 2  
Assessment Area: Springfield OH MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022					2023						
		Bank				Owner Occupied Units %	Count			Dollar			Count			Dollar		
		Count #	%	Dollar \$ (000s)	%		Bank #	%	Agg %	Bank \$ (000s)	%	Agg %	Bank #	%	Agg %	Bank \$ (000s)	%	Agg %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	4.4%	0	0.0%	2.2%	0	0.0%	3.6%	0	0.0%	3.9%	0	0.0%	11.6%
	Moderate	0	0.0%	0	0.0%	14.6%	0	0.0%	20.4%	0	0.0%	17.7%	0	0.0%	12.7%	0	0.0%	8.7%
	Middle	1	50.0%	30	54.5%	42.8%	0	0.0%	35.5%	0	0.0%	32.0%	1	100.0%	44.1%	30	100.0%	34.8%
	Upper	1	50.0%	25	45.5%	38.1%	1	100.0%	41.9%	25	100.0%	46.7%	0	0.0%	39.2%	0	0.0%	44.3%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	2	100%	55	100%	100.0%	1	100%	100%	25	100%	100%	1	100%	100%	30	100%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	4.4%	0	0.0%	2.7%	0	0.0%	2.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	14.6%	0	0.0%	21.6%	0	0.0%	12.7%	0	0.0%	31.6%	0	0.0%	25.1%
	Middle	0	0.0%	0	0.0%	42.8%	0	0.0%	43.2%	0	0.0%	41.2%	0	0.0%	47.4%	0	0.0%	50.5%
	Upper	0	0.0%	0	0.0%	38.1%	0	0.0%	32.4%	0	0.0%	44.1%	0	0.0%	21.1%	0	0.0%	24.4%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%
HMDA TOTALS	Low	4	13.3%	158	3.0%	4.4%	4	17.4%	2.2%	158	4.2%	2.0%	0	0.0%	3.3%	0	0.0%	2.1%
	Moderate	6	20.0%	1,558	29.4%	14.6%	4	17.4%	17.6%	1,160	30.8%	12.8%	2	28.6%	19.0%	398	25.8%	13.7%
	Middle	10	33.3%	1,002	18.9%	42.8%	6	26.1%	44.9%	727	19.3%	43.2%	4	57.1%	44.6%	275	17.8%	45.1%
	Upper	10	33.3%	2,587	48.8%	38.1%	9	39.1%	35.3%	1,717	45.6%	42.0%	1	14.3%	33.1%	870	56.4%	39.1%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	30	100%	5,305	100%	100.0%	23	100%	100%	3,762	100%	100%	7	100%	100%	1,543	100%	100%

Originations & Purchases  
Based on 2023 FFIEC Census Data; 2016-2020 ACS data

## Small Business Lending Tables

### Small Business Loans by Business Revenue & Loan Size

Assessment Area: Nonmetropolitan Ohio

		Bank Lending & Demographic Data				
		2023				
		Count		Dollar		Total Businesses
		#	%	\$ (000s)	\$ %	%
Revenue	\$1 Million or Less	11	68.8%	807	64.8%	90.6%
	Over \$1 Million	4	25.0%	421	33.8%	6.9%
	Total Rev. available	15	93.8%	1,228	98.6%	97.5%
	Rev. Not Known	1	6.3%	17	1.4%	2.5%
	Total	16	100%	1,245	100%	100%
Loan Size	\$100,000 or Less	12	75.0%	436	35.0%	
	\$100,001 - \$250,000	3	18.8%	524	42.1%	
	\$250,001 - \$1 Million	1	6.3%	285	22.9%	
	Total	16	100%	1,245	100%	
Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	9	81.8%	322	39.9%	
	\$100,001 - \$250,000	1	9.1%	200	24.8%	
	\$250,001 - \$1 Million	1	9.1%	285	35.3%	
	Total	11	100%	807	100%	

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data; 2023 D&B information

Percentages may not total 100 percent due to rounding

### Geographic Distribution of Small Business Loans

Assessment Area: Nonmetropolitan Ohio

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data 2023				
		Count		Dollar		Total Businesses
		#	%	\$ (000s)	\$ %	%
SMALL BUSINESSES	Low	0	0.0%	0	0.0%	0.0%
	Moderate	1	6.3%	47	3.8%	6.8%
	Middle	9	56.3%	772	62.0%	64.8%
	Upper	6	37.5%	426	34.2%	28.4%
	Unknown	0	0.0%	0	0.0%	0.0%
	<i>Total</i>	<i>16</i>	<i>100%</i>	<i>1,245</i>	<i>100%</i>	<i>100.0%</i>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data; 2023 D&B information

Percentages may not total 100 percent due to rounding

### Small Business Loans by Business Revenue & Loan Size

Assessment Area: Springfield OH MSA

		Bank Lending & Demographic Data			
		2023			
		Count		Dollar	
		#	%	\$ (000s)	\$ %
Revenue	\$1 Million or Less	2	100.0%	55	100.0%
	Over \$1 Million	0	0.0%	0	0.0%
	<i>Total Rev. available</i>	2	100.0%	55	100.0%
	Rev. Not Known	0	0.0%	0	0.0%
	<i>Total</i>	2	100%	55	100%
Loan Size	\$100,000 or Less	2	100.0%	55	100.0%
	\$100,001 - \$250,000	0	0.0%	0	0.0%
	\$250,001 - \$1 Million	0	0.0%	0	0.0%
	<i>Total</i>	2	100%	55	100%
Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	2	100.0%	55	100.0%
	\$100,001 - \$250,000	0	0.0%	0	0.0%
	\$250,001 - \$1 Million	0	0.0%	0	0.0%
	<i>Total</i>	2	100%	55	100%

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data; 2023 D&B information

Percentages may not total 100 percent due to rounding



### Geographic Distribution of Small Business Loans

Assessment Area: Springfield OH MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data 2023				
		Count		Dollar		Total
		#	%	\$ (000s)	\$ %	Businesses %
SMALL BUSINESSES	Low	0	0.0%	0	0.0%	5.6%
	Moderate	0	0.0%	0	0.0%	21.9%
	Middle	0	0.0%	0	0.0%	40.2%
	Upper	2	100.0%	55	100.0%	32.3%
	Unknown	0	0.0%	0	0.0%	0.0%
	<i>Total</i>	<i>2</i>	<i>100%</i>	<i>55</i>	<i>100%</i>	<i>100.0%</i>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data; 2023 D&B information

Percentages may not total 100 percent due to rounding

## Home Equity Lending Tables

### Borrower Distribution of Home Equity Loans

Assessment Area: Nonmetropolitan Ohio

Household Income Levels	Bank Lending & Demographic Data				
	2023				
	Count		Dollar		Families by Family Income
	#	%	\$ (000s)	\$ %	%
Low	0	0.0%	0	0.0%	14.3%
Moderate	1	14.3%	26	5.2%	17.5%
Middle	2	28.6%	68	13.6%	24.2%
Upper	4	57.1%	406	81.4%	44.0%
Unknown	0	0.0%	0	0.0%	
<i>Total</i>	<i>7</i>	<i>100.0%</i>	<i>499</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Percentages may not total 100 percent due to rounding

### Geographic Distribution of Home Equity Loans

Assessment Area: Nonmetropolitan Ohio

Tract Income Levels	Bank Lending & Demographic Data				
	2023				
	Count		Dollar		Owner Occupied Units
	#	%	\$ (000s)	\$ %	%
Low	0	0.0%	0	0.0%	0.0%
Moderate	1	14.3%	25	5.0%	4.9%
Middle	2	28.6%	69	13.8%	59.3%
Upper	4	57.1%	406	81.4%	35.7%
Unknown	0	0.0%	0	0.0%	0.0%
<i>Total</i>	<i>7</i>	<i>100%</i>	<i>499</i>	<i>100%</i>	<i>100.0%</i>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Percentages may not total 100 percent due to rounding

### Borrower Distribution of Home Equity Loans

Assessment Area: Springfield OH MSA

Household Income Levels	Bank Lending & Demographic Data 2023				
	Count		Dollar		Families by Family Income
	#	%	\$ (000s)	\$ %	%
Low	1	25.0%	12	5.8%	20.3%
Moderate	0	0.0%	0	0.0%	17.4%
Middle	1	25.0%	50	24.2%	21.8%
Upper	2	50.0%	145	70.0%	40.5%
Unknown	0	0.0%	0	0.0%	
<b>Total</b>	<b>4</b>	<b>100.0%</b>	<b>207</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Percentages may not total 100 percent due to rounding

### Geographic Distribution of Home Equity Loans

Assessment Area: Springfield OH MSA

Tract Income Levels	Bank Lending & Demographic Data 2023				
	Count		Dollar		Owner Occupied Units
	#	%	\$ (000s)	\$ %	%
Low	0	0.0%	0	0.0%	4.4%
Moderate	0	0.0%	0	0.0%	14.6%
Middle	3	75.0%	97	46.9%	42.8%
Upper	1	25.0%	110	53.1%	38.1%
Unknown	0	0.0%	0	0.0%	0.0%
<b>Total</b>	<b>4</b>	<b>100%</b>	<b>207</b>	<b>100%</b>	<b>100.0%</b>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Percentages may not total 100 percent due to rounding

## Consumer Lending Tables

### Borrower Distribution of Consumer Loans

Assessment Area: Nonmetropolitan Ohio

Household Income Levels	Bank Lending & Demographic Data 2023				Households by Household %
	Count		Dollar		
	#	%	\$ (000s)	\$ %	
Low	4	33.3%	61	47.7%	17.6%
Moderate	5	41.7%	17	13.3%	15.6%
Middle	2	16.7%	27	21.1%	19.7%
Upper	1	8.3%	23	18.0%	47.1%
Unknown	0	0.0%	0	0.0%	
Total	12	100.0%	128	100.0%	100.0%

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Percentages may not total 100 percent due to rounding

### Geographic Distribution of Consumer Loans

Assessment Area: Nonmetropolitan Ohio

Tract Income Levels	Bank Lending & Demographic Data 2023				
	Count		Dollar		Households %
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	0	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	7.5%
Middle	8	66.7%	72	56.3%	59.5%
Upper	4	33.3%	56	43.8%	33.0%
Unknown	0	0.0%	0	0.0%	0.0%
<i>Total</i>	12	100%	128	100%	100.0%

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Percentages may not total 100 percent due to rounding

### Borrower Distribution of Consumer Loans

Assessment Area: Springfield OH MSA

Household Income Levels	Bank Lending & Demographic Data 2023				
	Count		Dollar		Households by Household %
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	0	0.0%	22.4%
Moderate	0	0.0%	0	0.0%	17.9%
Middle	0	0.0%	0	0.0%	18.5%
Upper	0	0.0%	0	0.0%	41.2%
Unknown	0	0.0%	0	0.0%	
<i>Total</i>	0	0.0%	0	0.0%	100.0%

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Percentages may not total 100 percent due to rounding

### Geographic Distribution of Consumer Loans

Assessment Area: Springfield OH MSA

Tract Income Levels	Bank Lending & Demographic Data 2023				
	Count		Dollar		Households %
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	0	0.0%	7.6%
Moderate	0	0.0%	0	0.0%	20.2%
Middle	0	0.0%	0	0.0%	43.2%
Upper	0	0.0%	0	0.0%	28.9%
Unknown	0	0.0%	0	0.0%	0.0%
<i>Total</i>	0	0.0%	0	0.0%	100.0%

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Percentages may not total 100 percent due to rounding

## Appendix D – Glossary of Terms

**Aggregate lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

**Census tract:** A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community development:** 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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

**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, home equity lines of credit, 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 nonrelatives 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 is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar

amount of investments), and qualitative factors (for example, 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 do 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 applications, the amount of loan requested, and the disposition of the application (for example, approved, denied and withdrawn).

**Home mortgage loans:** Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

**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 is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

**Low-income:** Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of geography.

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

**Metropolitan area (MA):** A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on

specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

**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 geography.

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

**Other products:** Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

**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.

**Rated area:** A rated area is a state or multistate metropolitan 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 multistate metropolitan area, the institution will receive a rating for the multistate metropolitan 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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial 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 Reports 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.

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