PUBLIC DISCLOSURE

June 1, 2026

COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION

Wayne Bank and Trust Company
RSSD# 451246

500 South A Street
Richmond, Indiana 47374

Federal Reserve Bank of Chicago

230 South LaSalle Street
Chicago, Illinois 60604-1413

NOTE: This document is an evaluation of this bank'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 bank. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial bank.

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INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING

Wayne Bank and Trust Company (Wayne Bank) is rated **Satisfactory**. This rating is based on the following conclusions with respect to the performance criteria:

- The bank's loan-to-deposit ratio (LTD) is reasonable given the bank's size, financial condition, and assessment area (AA) credit needs.
- A majority of the bank's loans are originated inside the AA.
- An reasonable distribution of loans occurs throughout the bank's AA.
- Lending reflects an excellent distribution among individuals of different income levels, including low- and moderate-income (LMI), and businesses of different sizes.
- Neither the bank nor the Federal Reserve Bank of Chicago received any Community Reinvestment Act (CRA)-related complaints since the previous evaluation.

SCOPE OF EXAMINATION

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) Interagency Examination Procedures for Small Institutions to evaluate the bank's CRA performance. The evaluation considered performance context, including the bank's asset size, financial condition, business strategy and market competition, as well as AA demographic and economic characteristics, aggregate lending data, and credit needs. Lending performance was assessed within the bank's only AA**.**

In the evaluation of the geographic distribution of loans, the demographic figure refers to the percentage of owner-occupied housing units by census tract income level for home mortgage lending and the percentage of businesses by census tract income level for small business lending. In the evaluation of the bank's distribution of loans to borrowers of different income levels and businesses of different revenue sizes, the demographic figure refers to the percentage of families by income level for home mortgage lending and the percentage of businesses in the AA with revenues of $1 million or less for small business lending.

Examiners reviewed the following data:

- Loan-to-Deposit Ratio – The bank's 15-quarter average LTD ratio ending December 31, 2025, was calculated for the bank and compared to a sample of local competitors.

- Lending in the Assessment Area – A sample of the bank's 89 home mortgage and 43 small business loans originated from January 1, 2025, to December 31, 2025, were reviewed to determine the percentage of loans originated in the assessment area.
- Geographic Distribution of Lending in the Assessment Area – A sample of the

bank's 65 home mortgage and 27 small business loans originated in the assessment area, from January 1, 2025, to December 31, 2025, were analyzed to determine the extent to which the bank is making loans in geographies of different income levels. Small business loans received greater weight in the analysis given the bank's loan portfolio composition.

- Lending to Borrowers of Different Income Levels and to Businesses of Different Sizes – A sample of the bank's 65 home mortgage and 27 small business loans originated in the assessment area, from January 1, 2025, to December 31, 2025, were reviewed to determine the distribution among individuals of different income levels, including low- and moderate-income, and businesses of different revenue sizes. Small business loans received greater weight in the analysis given the bank's loan portfolio composition.

- Response to Substantiated Complaints – Complaints were reviewed to determine if any were related to the bank's record of helping to meet community credit needs and its responses to any received were evaluated for appropriateness.

DESCRIPTION OF INSTITUTION

Wayne Bank is a community bank headquartered in Richmond, Indiana. The bank's characteristics include the following.

- The bank is a wholly owned subsidiary of Waytru Bancorp.
- The bank has total assets of $251.1 million as of December 31, 2025.
- In addition to its main office in Richmond, Indiana, the bank has three additional offices located in Cambridge City, Hagerstown, and Richmond, Indiana.
- Since the previous evaluation, the bank relocated its Gateway branch and associated cash-only ATM to the east side of Richmond in January 2024. This relocation remained within the same upper-income census tract. In addition, on April 16, 2026, the institution opened a temporary branch location in Hagerstown, Indiana, within a middle-income census tract.
- The institution's branch network and delivery systems provide consumers with access to banking services through its assessment area.
- Each location has a cash-only ATM with the exception of the Hagerstown location.
- As shown in the table below, the primary business focus is commercial and residential real estate lending, which together comprise the majority of the loan portfolio (87.3 percent).

Table 1

Composition of Loan Portfolio as of December 31, 2025		
Loan Type	**$(000)**	**%**
Commercial	117,152	58.7
Residential Real Estate	57,116	28.6
Consumer	15,213	7.6
Agricultural	5,349	2.7
Other	4,821	2.4
Gross Loans	199,651	100.0
Note: Percentages may not total 100.0 percent due to rounding.		

The bank was rated Satisfactory under the CRA at its May 16, 2022, performance evaluation. There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities.

DESCRIPTION OF ASSESSMENT AREA

The bank's Non-MSA Indiana AA consists of Fayette, Henry, and Wayne counties, in their entireties (see Appendix A for additional demographic data).

- The assessment area's geographic delineation has remained unchanged since the previous examination.
- Based on updates from the 2020 Decennial Census and the 2016-2020 American Community Survey (ACS), the number of census tracts increased from 37 to 38; however, the number of low- or moderate-income census tracts decreased from 14 to 12. As a result, the AA is comprised of two low-income census tracts, 10 moderate-income census tracts, 21 middle-income census tracts, and five upper-census tracts; none of which are considered distressed or underserved.
- According to the June 30, 2025, Federal Deposit Insurance Corporation (FDIC) Deposit Market Share report, Wayne Bank ranked seventh of 13 FDIC-insured financial institutions operating within the AA. The bank held $215.6 million in deposits, representing 4.9 percent of the total deposit market share. In comparison, the financial institutions comprising the largest percentages of deposit market share include Merchants Bank of Indiana and U.S. Bank National Association, with 23.5 percent and 18.5 percent, respectively, indicating a strong level of competition in the area.
- A community representative was interviewed to provide information regarding the local economic and socio-economic conditions in the AA. The organization contacted focused on economic development and indicated that economic conditions within the AA remain generally stable. Small businesses were reported to be operating successfully, with no specific expansions or closures noted. While access to credit remains available, ongoing needs persist for affordable housing, small business financing, and community development. Overall, the representative did not identify significant unmet banking needs and noted that financial institutions serve an active role in the community.

Table 2

Population Change Assessment Area: Non-MSA Indiana			
Area	**2015 Population**	**2020 Population**	**Percent Change**
Assessment Area	140,785	138,865	-1.4
Fayette County, IN	23,773	23,398	-1.6
Henry County, IN	49,146	48,914	-0.5
Wayne County, IN	67,866	66,553	-1.9
Non-MSA Indiana	1,494,638	1,487,563	-0.5
State of Indiana	6,568,645	6,785,528	3.3
Source: 2020 U.S. Census Bureau: Decennial Census 2011 - 2015 U.S. Census Bureau: American Community Survey			

- As reflected in Table 2, according to the U.S. Census Bureau, the assessment area's population is 138,865, which represents a decline of 1.4 percent from 2015 to 2020.
- Fayette and Wayne counties experienced similar declines in population during the same period of 1.6 and 1.9 percent, respectively, while Henry County experienced a decline of 0.5 percent.
- The entire Non-MSA Indiana experienced a population decrease of 0.5 percent, while the state of Indiana experienced a population increase of 3.3 percent.
- A community representative stated that the assessment area's population continues to decline, primarily driven by the migration of young adults and college-educated individuals seeking greater employment opportunities and a higher quality of life in larger metropolitan statistical areas (MSAs). The representative noted that employers within Wayne County have increasingly relied on recruiting individuals from outside the community to address workforce shortages. Additionally, limited housing supply and comparatively lower wages have further contributed to the population decline, as residents seek areas offering higher paying employment opportunities and improved housing availability.

Table 3

Median Family Income Change Assessment Area: Non-MSA Indiana			
Area	**2015 Median Family Income**	**2020 Median Family Income**	**Percent Change**
Assessment Area	54,459	60,823	11.7
Fayette County, IN	51,914	56,820	9.5
Henry County, IN	57,925	62,770	8.4
Wayne County, IN	53,543	60,991	13.9
Non-MSA Indiana	60,746	66,091	8.8
State of Indiana	66,777	73,265	9.7
Source: 2011 – 2015 U.S. Census Bureau: American Community Survey 2016 – 2020 U.S. Census Bureau: American Community Survey Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.			

- According to the U.S. Census Bureau, the assessment area is comprised of 36,219 families, of which 23.7 percent are designated as low-income, 18.7 percent as moderate-income, 22.4 percent as middle-income, and 35.2 percent as upper-income families.

- Additionally, 12.1 percent of families residing within the assessment area live below the poverty line, which is above both the Non-MSA Indiana and the state of Indiana's poverty rates of 9.1 and 8.9 percent, respectively.
- As reflected in Table 3, Wayne County has experienced the greatest growth in median family income (MFI) from 2015 to 2020 at 13.9 percent, driving the overall 11.7 percent MFI increase in the AA. Fayette and Henry counties MFI has grown at a lesser rate of 9.5 and 8.4 percent, respectively.
- The AA MFI increase of 11.7 percent was greater in comparison to the entire Non-MSA Indiana and the state of Indiana's increases of 8.8 and 9.7 percent, respectively. Notably, the AA MFI by dollar is lower in comparison to the entire Non-MSA Indiana and state of Indiana.
- A community representative noted the AA has historically experienced lower MFI levels, and workforce growth remains a challenge for many employers. As a result, businesses have had to increase wages to remain competitive and attract qualified talent. The expansion of the economic industrial park has contributed to approximately 150 new job openings offering higher wages, which has subsequently pressured other employers in the area to increase compensation. While the MFI has experienced growth, the rising cost of living continues to be a primary driver of financial strain among low- and moderate-income households. The community representative also noted the rising food costs are impacting low- and moderate-income households, resulting in increased community needs. The representative stated that local schools have reportedly been sending food home with students to alleviate financial pressures faced by families.

Table 4

Housing Cost Burden
Assessment Area: Non-MSA Indiana

Area	Cost Burden – Renters			Cost Burden – Owners		
	Low-Income	Moderate-Income	All Renters	Low-Income	Moderate-Income	All Owners
Assessment Area	72.0	21.7	38.8	60.4	18.3	16.2
Fayette County, IN	76.5	14.7	41.9	52.3	17.6	15.3
Henry County, IN	72.0	25.7	37.1	59.1	16.8	15.0
Wayne County, IN	70.2	22.1	38.7	64.7	19.7	17.4
Non-MSA Indiana	65.7	22.7	34.0	55.9	20.2	14.5
State of Indiana	74.9	33.3	41.2	58.8	23.7	14.9

Cost Burden is housing cost that equals 30 percent or more of household income.
Source: U.S. Department of Housing and Urban Development (HUD), 2018 – 2022 Comprehensive Housing Affordability Strategy

- There is a total of 63,497 housing units within the AA. The majority of the housing units are owner-occupied at 60.9 percent, whereas rental units account for 26.5 percent of total units. Further, 12.6 percent of housing units are vacant, which is slightly higher than the percentage of the vacant units within the state of Indiana at 10.4 percent.

- As reflected in Table 4, low-income renters and owners are significantly housing cost burdened in the AA, with 72.0 percent and 60.4 percent of these individuals, paying more than 30.0 percent of their household income on housing.
- Low-income renters and owners are experiencing similar trends across all counties, which comprise the AA, the entire Non-MSA Indiana, and the state of Indiana.
- According to a community representative, the housing market remains highly competitive, emphasizing the need for additional housing development to alleviate affordability pressures within the AA. It was noted that developers are experiencing challenges in maintaining adequate profit margins necessary to sustain the development of affordable housing, particularly in lower-income areas and among populations impacted by age and health related limitations. Additionally, the lack of significant housing development over the past ten years, despite developers submitting applications, has further contributed to rising housing costs within the assessment area, including low- and moderate-income households. Overall, elevated interest rates, limited housing supply and increased construction, and material costs continue to strain housing affordability.

Table 5

Unemployment Rates Assessment Area: Non-MSA Indiana					
Area	**2020**	**2021**	**2022**	**2023**	**2024**
Assessment Area	7.1	3.8	3.3	3.6	4.4
Fayette County, IN	8.2	4.0	3.7	3.7	4.8
Henry County, IN	7.0	3.7	3.4	3.6	4.2
Wayne County, IN	6.8	3.8	3.1	3.5	4.4
Non-MSA Indiana	6.8	3.4	2.9	3.3	4.1
State of Indiana	7.3	3.9	3.1	3.4	4.2
Source: Bureau of Labor Statistics: Local Area Unemployment Statistics					

- Based on the U.S. Bureau of Labor Statistics data, the AA has similar unemployment rates as the entire Non-MSA Indiana and the state of Indiana.
- After increasing notably during the COVID-19 pandemic, the unemployment rate in 2024 in the AA of 4.4 percent is comparable to the entire Non-MSA Indiana and state of Indiana rates of 4.1 and 4.2 percent, respectively. Fayette County experiences unemployment at the highest rate of 4.8 percent among the counties comprising the AA.
- A community representative indicated that educational funding shortfalls and federal grant reductions directly impact local unemployment. The lack of funding has led school districts to conduct layoffs for teachers and administrators, and cut specialized student programs, which directly restrict the local workforce across Fayette, Henry, and Wayne counties. In addition, Wayne County faces a structural skill mismatch. Manufacturing and engineering maintenance sectors are struggling with talent shortages, while nurses in the healthcare industry are challenged by retention and quality of life issues that make finding and retaining qualified workers difficult.

- According to the U.S. Bureau of Labor Statistics, manufacturing, government, retail trade, and healthcare and social assistance have the largest number of employees in the assessment area. Retail trade, health care and social assistance, accommodation and food services, and construction have the largest number of establishments in the assessment area.
- A community representative noted that retail trade and health care/social assistance continue to be the primary economic drivers; however, the representative stated manufacturing also plays a role in the economy across all three AA counties. Wayne County features a robust manufacturing industry dedicated to direct automotive machinery. It was also noted that the education sector is a dominant industry within Wayne County, supported by the presence of five school districts: Centerville-Abington Community Schools, Nettle Creek School Corporation, Northeastern Wayne Schools, Richmond Community Schools, and Western Wayne Schools. In addition, the representative noted that small businesses generally remain stable, with no significant expansions or closures observed at this time.

Table 6

Small Business Loan Trends Assessment Area: Non-MSA Indiana					
Area	**2020**	**2021**	**2022**	**2023**	**2024**
Assessment Area	1,608	1,856	1,578	1,408	1,537
Fayette County, IN	187	220	180	166	179
Henry County, IN	532	574	507	452	511
Wayne County, IN	889	1,062	891	790	847
Non-MSA Indiana	19,047	21,932	18,583	16,575	17,157
State of Indiana	111,219	122,383	112,358	103,913	111,368
Source: FFIEC CRA Aggregate Data					

- Based on the FFIEC CRA Aggregated Data and referenced in Table 6, the AA originated 1,537 small business loans in 2024, consisting of 179 loans in Fayette County, 511 loans in Henry County, and 847 loans in Wayne County.
- From 2020 to 2023, small business loan originations within the assessment area declined by 12.4 percent but increased by 9.2 percent from 2023 to 2024.
- From 2023 to 2024, the Non-MSA Indiana and state of Indiana experienced increases in small business loan originations of 3.5 percent and 7.2 percent, respectively.

Table 7

Home Mortgage Loan Trends Assessment Area: Non-MSA Indiana					
Area	**2020**	**2021**	**2022**	**2023**	**2024**
Assessment Area	3,753	4,242	2,829	2,094	2,338
Fayette County, IN	577	710	542	405	434
Henry County, IN	1,416	1,579	1,009	731	909
Wayne County, IN	1,760	1,953	1,278	958	995
Non-MSA Indiana	47,383	49,057	31,183	22,393	24,935
State of Indiana	294,279	290,055	163,755	114,765	128,175
Source: FFIEC Home Mortgage Disclosure Act Aggregate Data					

- Based on the FFIEC Home Mortgage Disclosure Act Aggregated Data, the assessment area originated 2,338 home mortgage loans in 2024, consisting of 434 loans in Fayette County, 909 loans in Henry County, and 995 loans in Wayne County.
- From 2020 to 2023, home mortgage loan originations within the assessment area declined significantly by 44.2 percent but increased by 11.7 percent from 2023 to 2024..
- From 2023 to 2024, the Non-MSA Indiana and the State of Indiana experienced increases in home mortgage loan originations of 11.4 percent and 11.7 percent, respectively.
- According to the community representative, the decrease in both small business and home mortgage lending since 2022 is driven by high interest rates, tax-assessments, and property taxes, which increases the total cost of owning a home or business and increases the overall cost of living. As a result, the primary barriers low- and moderate-income individuals encounter are the lack of access to down payment assistance programs and meeting the income thresholds necessary to qualify.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

The bank's overall Lending Test performance is Satisfactory. Overall, the bank is meeting the credit needs of its assessment area based on an analysis of the bank's lending activities. The loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, and assessment area credit needs. The majority of home mortgage and small business loans were originated in the assessment area. The geographic distribution of loans reflects a reasonable dispersion throughout the assessment area, and lending activities reflect excellent penetration among individuals of different income levels and among businesses of different sizes. Small business loans received greater weight in the analysis given the bank's loan portfolio composition. Additionally, neither Wayne Bank nor the Federal Reserve Bank of Chicago have received any CRA-related complaints since the previous evaluation.

Loan-to-Deposit Ratio

This performance criterion evaluates the average LTD ratio to determine the reasonableness of lending in light of performance context, such as the bank's capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AA, and in comparison, to similarly situated FDIC-insured institutions. Similarly situated institutions were selected based on asset size, similar product portfolio, and operations within the AA and nearby surrounding counties.

Wayne Bank's LTD is reasonable. As of December 31, 2025, the LTD ratio averaged 82.5 percent over a 15-quarter period. The ratio was slightly below the two highest peer ratios and exceeded the ratios reported by the remaining peer institutions. The LTD ratio has decreased slightly since the previous evaluation when the bank had an average loan-to-deposit ratio of 84.5 percent over a 24-quarter period. Through discussion with bank management, the decline in the average LTD ratio is a result of fluctuating loan demand.

The following table compares the institution's LTD ratio to its local competitors.

Table 8

Comparative LTD Ratios June 30, 2022 – December 31, 2025			
Institution	**Location**	**Asset Size $(000)**	**LTD Ratio (%) 15 Quarter Average**
Wayne Bank and Trust Company	**Richmond, IN**	**251,098**	**82.5**
Similarly Situated Institutions			
Union Savings and Loan Association	Connersville, IN	257,648	89.4
Bath State Bank	Bath, IN	337,321	82.8
Farmers State Bank	New Madison, OH	329,338	79.6
Owen City State Bank	Spencer, IN	389,086	75.7
First Federal Savings and Loan Association of Greensburg	Greensburg, IN	151,384	56.9

Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the AA. The bank originated a majority of loans, by number and dollar, inside the AA. Within a sample of 132 loans originated during the evaluation period, the bank originated 69.7 percent of total loans by number and 50.7 percent by dollar amount inside the AA. When evaluating loans by type and number, the bank originated 73.0 percent of home mortgage loans and 62.8 percent of small business loans inside the AA. This concentration of lending within the AA indicates the bank is serving the credit needs of its local community.

The following table summarizes the bank's lending inside and outside its AA for samples of home mortgage and small business loans from January 1, 2025, to December 31, 2025.

Table 9

Lending Inside and Outside the Assessment Area								
Loan Type	**Inside**				**Outside**			
	#	**#%**	**$(000)**	**$%**	**#**	**#%**	**$(000)**	**$%**
Home Mortgage	65	73.0	7,334	52.8	24	27.0	6,560	47.2
Small Business	27	62.8	4,636	47.7	16	37.2	5,084	52.3
Total Loans	92	69.7	11,971	50.7	40	30.3	11,644	49.3

Note: Percentages may not total 100.0 percent due to rounding.

Geographic Distribution of Loans

This performance criterion evaluates the bank's distribution of lending within its AA by income level of census tracts with consideration given to the dispersion of loans throughout the AA. The geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AA.

An analysis of the dispersion of loans throughout the assessment area was conducted to identify any conspicuous gaps in lending. The AA contains 38 total census tracts, of which two are low-income and 10 are moderate-income. In 2025, the bank originated home mortgage and small business loans in a majority of the census tracts (57.9 percent) within its AA, and no unexplained or conspicuous lending gaps were identified.

Home Mortgage Lending

The geographic distribution of home mortgage lending is reasonable. The distribution of home mortgage lending in low-income census tracts of 4.6 percent was above the demographic figure of 2.6 percent. Lending in moderate-income tracts of 12.3 percent was below the demographic figure of 21.5 percent, primarily due to affordability constraints, housing shortages noted within the assessment area, and competition among lenders as identified by a community representative.

The following table presents the bank's geographic distribution of home mortgage loans originated within the bank's AA.

Table 10

Distribution of 2025 Home Mortgage Lending by Income Level of Geography Assessment Area: Non-MSA Indiana					
Geographic Income Level	**Bank Loans**				**Owner-Occupied Units %**
	#	**#%**	**$(000)**	**$%**	
Low	3	4.6	236	3.2	2.6
Moderate	8	12.3	928	12.7	21.5
Middle	34	52.3	3,917	53.4	63.6
Upper	20	30.8	2,253	30.7	12.3
Unknown	0	0.0	0	0.0	0.0
Total	65	100.0	7,334	100.0	100.0

Source: 2025 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Small Business Lending

The geographic distribution of small business lending is reasonable. The distribution of small business lending in low-income census tracts of 11.1 percent was above the demographic figure of 7.0 percent. The distribution of small business lending in moderate-income tracts of 33.3 percent was above the demographic figure of 26.4 percent. In 2025, Wayne Bank originated 44.4 percent of its small business loans in low- and moderate-income tracts within the assessment area.

The following table presents the bank's geographic distribution of small business loans originated within the bank's AA.

Table 11

Distribution of 2025 Small Business Lending by Income Level of Geography
Assessment Area: Non-MSA Indiana

Geographic Income Level	Bank Loans				Total Businesses %
	Bank		Bank		
	#	#%	$(000)	$%	
Low	3	11.1	445	9.6	7.0
Moderate	9	33.3	1,043	22.5	26.4
Middle	8	29.6	1,375	29.7	54.8
Upper	7	25.9	1,773	38.2	11.8
Unknown	0	0.0	0	0.0	0.0
Total	27	100.0	4,636	100.0	100.0

Source: 2025 FFIEC Census Data
2025 Dun & Bradstreet Data
2016 – 2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

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

This performance criterion evaluates the lending to borrowers of different income levels and businesses of different sizes. The bank's lending has an excellent distribution among individuals of different income levels, including low- and moderate-income individuals and businesses of different sizes, given the demographics of the assessment area.

Home Mortgage Lending

The borrower distribution of home mortgage lending is reasonable. The distribution of home mortgage lending to low-income borrowers of 7.7 percent is below the demographic figure of 23.7 percent. However, a community representative stated there are affordability constraints, housing shortages within the assessment area, and competition among lenders limiting the opportunity for originations. The distribution of home mortgage lending to moderate-income borrowers of 27.7 percent is above the demographic figure of 18.7 percent.

The following table presents the borrower distribution of home mortgage loans originated within the bank's AA.

Table 12

Distribution of 2025 Home Mortgage Lending by Borrower Income Level Assessment Area: Non-MSA Indiana					
Borrower Income Level	**Bank Loans**				**Families by Family Income %**
	Bank		**Bank**		
	#	**#%**	**$(000)**	**$%**	
Low	5	7.7	425	5.8	23.7
Moderate	18	27.7	1,584	21.6	18.7
Middle	14	21.5	1,221	16.6	22.4
Upper	28	43.1	4,104	56.0	35.2
Unknown	0	0.0	0	0.0	0.0
Total	65	100.0	7,334	100.0	100.0

Source: 2025 FFIEC Census Data
2016 – 2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

<u>Small Business Lending</u>

The borrower distribution of small business lending is excellent. The distribution of small business lending to businesses with annual revenues of one million dollars or less was above the demographic figure of 90.8 percent. Within the sample of small business loans reviewed, 92.6 percent were originated to small businesses with gross annual revenues equal to or less than one million dollars. Of the small business loans originated to businesses with annual revenues of one million dollars or less, 52.0 percent were in amounts of $100,000 or less, which are considered most beneficial to small businesses, demonstrating the bank's ability to meet small business credit needs within the AA.

The following table presents the bank's borrower distribution of small business loans originated within the bank's AA.

Table 13

Distribution of 2025 Small Business Lending by Revenue Size of Businesses Assessment Area: IN Non MSA					
	Bank Loans				**Total Businesses %**
	#	**#%**	**$(000)**	**$%**	
By Revenue					
$1 Million or Less	25	92.6	3,636	78.4	90.8
Over $1 Million	2	7.4	1,000	21.6	7.5
Revenue Unknown	0	0.0	0	0.0	1.7
Total	27	100.0	4,636	100.0	100.0
By Loan Size					
$100,000 or Less	13	48.1	646	13.9	
$100,001 – $250,000	8	29.6	1,400	30.2	
$250,001 – $1 Million	6	22.2	2,590	55.9	
Total	27	100.0	4,636	100.0	
By Loan Size and Revenue $1 Million or Less					
$100,000 or Less	13	52.0	646	17.8	
$100,001 – $250,000	8	32.0	1,400	38.5	
$250,001 – $1 Million	4	16.0	1,590	43.7	
Total	**25**	**100.0**	**3,636**	**100.0**	

Source: 2025 FFIEC Census Data
2025 Dun & Bradstreet Data
2016 – 2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Response to Complaints

The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet the credit needs in its AA is appropriate.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Compliance with the substantive provisions of antidiscrimination and other consumer protection laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act, was considered as part of 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 meet community credit needs was identified.

APPENDIX A – DEMOGRAPHIC INFORMATION

Table A-1 — Map of Assessment Area

Wayne Bank and Trust Co. 451246

IN Non MSA

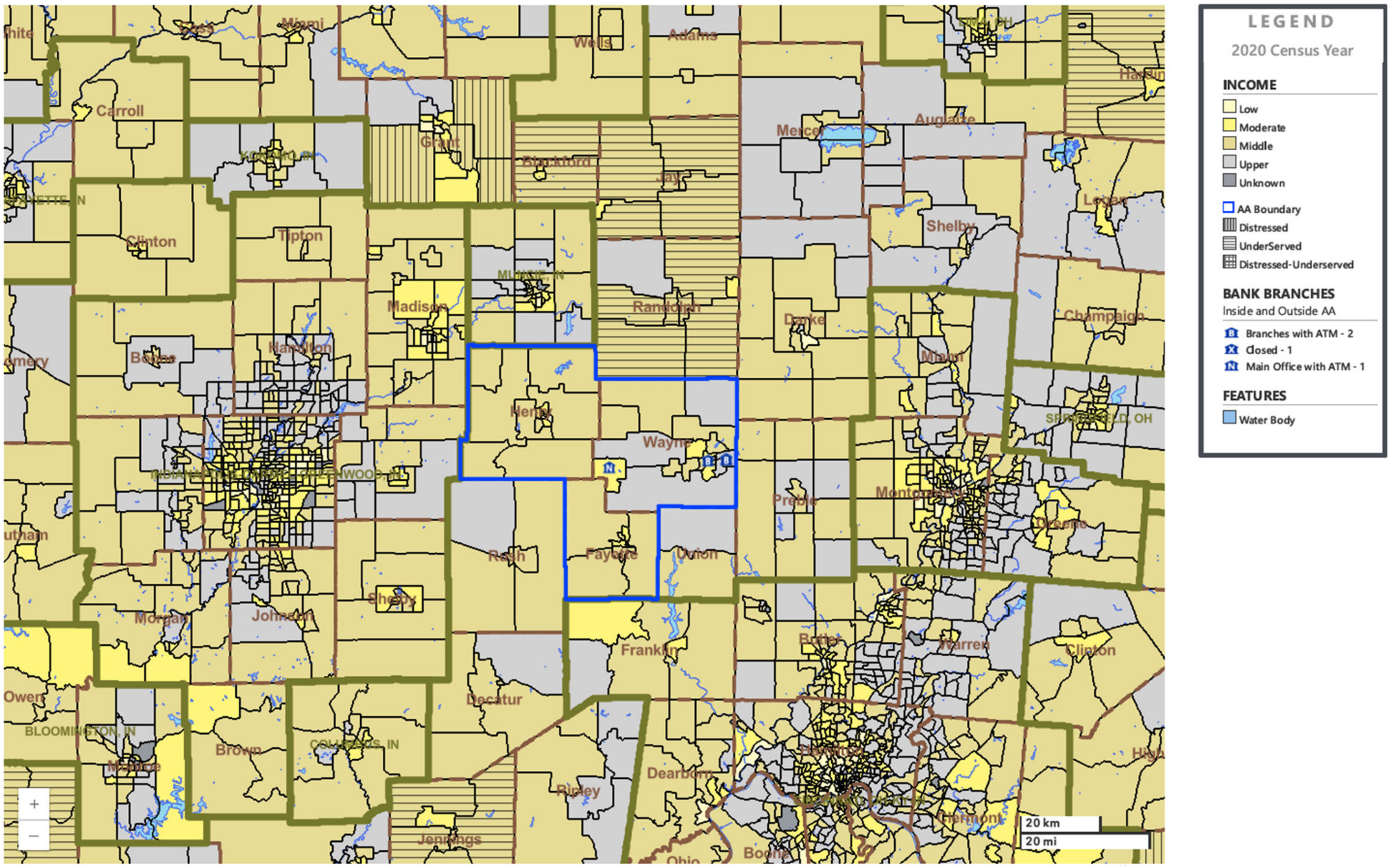

Table A-2 — Demographic Data

2025 IN Non MSA Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	2	5.3	1,256	3.5	382	30.4	8,573	23.7
Moderate	10	26.3	7,974	22.0	1,616	20.3	6,766	18.7
Middle	21	55.3	22,059	60.9	2,131	9.7	8,127	22.4
Upper	5	13.2	4,930	13.6	270	5.5	12,753	35.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**38**	**100.0**	**36,219**	**100.0**	**4,399**	**12.1**	**36,219**	**100.0**
	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	**% by tract**	**% by unit**	**#**	**% by unit**	**#**	**% by unit**
Low	3,671	1,020	2.6	27.8	1,482	40.4	1,169	31.8
Moderate	16,080	8,301	21.5	51.6	5,296	32.9	2,483	15.4
Middle	36,773	24,619	63.6	66.9	8,191	22.3	3,963	10.8
Upper	6,973	4,752	12.3	68.1	1,847	26.5	374	5.4
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**63,497**	**38,692**	**100.0**	**60.9**	**16,816**	**26.5**	**7,989**	**12.6**
	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	6	2.0	6	2.0	0	0.0	0	0.0
Middle	211	71.0	211	71.0	0	0.0	0	0.0
Upper	80	26.9	80	26.9	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**297**	**100.0**	**297**	**100.0**	**0**	**0.0**	**0**	**0.0**
Percentage of Total Businesses:				**90.8**		**7.5**		**1.7**

Source: 2025 FFIEC Census Data
2016 – 20020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

APPENDIX B – GLOSSARY

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, 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 a geography.

Market share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the 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 a geography.

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

Nonmetropolitan area (NonMSA): Any area that is not located within an MSA.

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. For these institutions, no state ratings will be received unless the bank also maintains deposit facilities outside of the multistate metropolitan area. CRA activity is captured in either a state rating or a multistate metropolitan area rating, but not both.

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 Consolidated Reports of Condition and Income (Call Report) instructions. 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 a geography.