

# **PUBLIC DISCLOSURE**

August 19, 2024

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Civista Bank  
RSSD #542528

100 East Water Street  
Sandusky, Ohio 44870

Federal Reserve Bank of Cleveland

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

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including LMI neighborhoods, consistent with the 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: SATISFACTORY**

The following table indicates the performance level of Civista Bank with respect to the lending, investment, and service tests.

PERFORMANCE LEVELS	CIVISTA PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding		X	
High Satisfactory	X		X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

\* Note: The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors supporting the institution's rating include:

- A good responsiveness to credit needs;
- An adequate percentage of loans originated in the bank's assessment area (AA);
- A good distribution of loans among borrowers of different income levels and an excellent level to businesses of different sizes;
- An excellent geographic distribution of loans throughout the AA;
- A good record of serving the credit needs of low-income individuals and areas and very small businesses;
- Makes a relatively high level of community development loans;
- Makes use of flexible lending practices in serving the AA's credit needs;
- An excellent level of qualified community development investments and grants;
- Makes occasional use of complex investments;
- Retail delivery systems are reasonably accessible to geographies and individuals of different income levels and businesses of different revenue sizes;
- A record of opening and closing banking centers has not adversely effected the accessibility of delivery systems;
- Banking services and hours do not vary in a way that inconveniences any portions of the AAs; and,
- Provides a relatively high level of community development services.

## DESCRIPTION OF INSTITUTION

### Overview

Civista Bank (Civista) is a wholly-owned subsidiary of Civista Bancshares, Inc., a bank holding company headquartered in Sandusky, Ohio. As of March 31, 2024, Civista reports total assets of \$3.9 billion and total deposits of \$3.0 billion, representing a 21.8% increase in total assets and 12.4% increase in total deposits since the previous evaluation. Civista accounted for 100 percent of the holding company's consolidated assets. Civista does not have nonbank subsidiaries that provide mortgage lending or CRA qualified investments on its behalf.

Civista acquired Comunibanc Corp. (Comunibanc) and its wholly-owned subsidiary The Henry County Bank, effective July 1, 2022. As a result, Civista's delineated CRA footprint expanded in Northwest Ohio with additional six branches in Henry County<sup>1</sup> and one branch in Wood County.<sup>2</sup> Activities from these banking centers are being considered in this performance evaluation.

### Business Lines

Civista operates four lines of business. These business units provide traditional banking services to business and retail clients:

- Commercial Banking – includes investment commercial real estate, finance, and Small Business Administration funding
- Investments – includes full-service brokerage services and insurance
- Private Banking – includes wealth management which provides wealth planning, portfolio management, trust and estate, and retirement plan services
- Retail Banking – includes checking, savings, debit cards, credit cards, mortgages, home equity lines, and personal loans.

### Assessment Areas

The following summarizes Civista's AAs evaluated as part of this CRA performance evaluation:

#### *Ohio*

- Akron OH Metropolitan Statistical Area (MSA) #10420, consisting of the entirety of Summit County (excluding Portage County)
- Cleveland-Elyria MSA #17460, consisting of the entirety of Cuyahoga County (excluding Geauga, Lake, Lorain, and Medina counties)
- Columbus OH MSA #18140, consisting of the entirety of Delaware, Franklin, Madison, and Union counties (excluding Fairfield, Hocking, Licking, Morrow, Perry, and Pickaway counties)
- Dayton-Kettering OH MSA #19430, consisting of the entirety of Montgomery County

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<sup>1</sup> Henry County is in Nonmetropolitan Ohio.

<sup>2</sup> Wood County is in the Toledo OH MSA

(excluding Miami and Greene counties)

- Mansfield OH MSA #31900, consisting of the entirety of Richland County
- Nonmetropolitan Ohio, consisting of the entirety of Champaign, Crawford, Erie, Henry<sup>3</sup>, Huron, Logan, Sandusky, and Seneca counties
- Toledo OH MSA #45780, consisting of the entirety of Ottawa and Wood<sup>4</sup> counties (excluding Fulton and Lucas counties)

### *Indiana*

- Cincinnati OH-KY-IN MSA #17140,<sup>5</sup> consisting of the entirety of Dearborn County (excluding Brown, Butler, Clermont, Hamilton, and Warren counties in Ohio; Boone, Bracken, Campbell, Gallatin, Grant, Kenton, and Pendleton counties in Kentucky; and Franklin, Ohio, and Union counties in Indiana)
- Nonmetropolitan Indiana, consisting of the entirety of Ripley County

### **Financial Overview**

Civista offers a wide variety of consumer, residential real estate, commercial, and agricultural loan products to fulfill the credit needs of the residents and businesses in its AAs. Consumer loan products include auto loans, personal lines of credit, installment loans, home equity lines of credit, mortgage loans, and credit cards. Civista also offers construction lending and commercial loan products, including loans and lines of credit, business credit cards, and Small Business Administration (SBA) loans.

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<sup>3</sup> Henry County added to Nonmetropolitan Ohio AA, effective July 1, 2022, with the acquisition of Comunibanc.

<sup>4</sup> Wood County added to Toledo AA, effective July 1, 2022, with the acquisition of Comunibanc.

<sup>5</sup> While the Cincinnati OH-KY-IN MSA is a multi-state metropolitan area, lending and community development activity is being evaluated in the State of Indiana, because the bank has no branches or deposit-taking ATMs in the MSA's counties in Ohio or Kentucky.

The following chart displays Civista's loan portfolio composition as of March 31, 2024.

Composition of Loan Portfolio as of March, 31, 2024		
Loan Type	\$ (000s)	%
Construction and Development	267,737	9.4%
Secured by One- to Four- Family Dwellings	680,517	23.9%
Other Real Estate: Farmland	24,908	0.9%
Multifamily	292,951	10.3%
Nonfarm nonresidential	1,260,156	44.3%
Commercial and Industrial	297,943	10.5%
Loans to Individuals	15,787	0.6%
Agricultural Loans	4,649	0.2%
<b>Total</b>	<b>\$2,844,648</b>	<b>100.00%</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.

Civista's investment portfolio as of March 31, 2024, was \$621.8 million, representing 16.1% of total assets. Investments in municipal securities accounted for 53.6% of investments, while U.S. Treasury and Agency securities and other securities comprised 36.2% and 7.3% of total investments, respectively. The remaining 2.9% of total investments consisted of interest-bearing bank balances.

No known legal impediments exist that would restrain Civista from meeting the credit needs of its AAs.

### **Previous Public Evaluation**

Civista's CRA performance was evaluated using the CRA Examination Procedures for Large Banks. Civista received a Satisfactory rating in the June 21, 2022, CRA Performance Evaluation. The lending test was rated High Satisfactory, investment test was rated Outstanding, and the service test was rated Low Satisfactory.

## SCOPE OF EXAMINATION

For the purpose of this evaluation, Civista is an interstate bank with nine delineated CRA AAs – seven AAs in Ohio and two AAs in Indiana.

The following AAs received full-scope reviews:

- Nonmetropolitan Ohio
- Toledo OH MSA (Toledo AA)
- Cincinnati OH-KY-IN MSA (IN Cincinnati MSA or Dearborn AA)

Limited-scope reviews were completed for the remaining AAs:

- Akron OH MSA (Akron AA)
- Cleveland-Elyria MSA (Cleveland AA)
- Columbus OH MSA (Columbus AA)
- Dayton-Kettering OH MSA (Dayton AA)
- Mansfield OH MSA (Mansfield AA)

Nonmetropolitan Ohio received the most weight in this evaluation because it is Civista's primary market. It has the most branches and the largest concentrations of lending, deposits, and community development activities. The Dearborn AA received the second-highest weight; because it has the highest percentage of LMI tracts and fourth largest concentration of total lending, followed by the Toledo AA.

### **Examination Evaluation Period and Products Reviewed**

This evaluation includes an analysis of HMDA-reportable and CRA-reportable loans originated from January 1, 2022, through December 31, 2023. In accordance with CRA examination procedures, the HMDA universe was reviewed,<sup>6</sup> and home purchase, refinance, and home improvement loans were evaluated separately in Nonmetropolitan Ohio and the Dearborn AA. In the Toledo AA home purchase and refinance loans were evaluated separately; however, due to limited volume, home improvement loans were not considered. The universe of small business loans was used based on the availability of revenue data. Small business loans were evaluated in each AA. Conclusions were reached based on combined 2022 and 2023 lending data for each product evaluated. Multi-family, other purpose closed-end, and small farm loans were not considered in this evaluation due to limited volumes. Other types of consumer loans that can be reported optionally were not included in the analysis.

Based on the total loan volume by number and dollar amounts, HMDA-reportable loans (home purchase, refinance, and home improvement, respectively) received the greatest weight followed by small business loans.

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<sup>6</sup>HMDA data was reviewed since the bank's previous evaluation; however, only data for 2022 and 2023 is presented in this evaluation.



Community development loans and investments funded between June 22, 2022, through August 19, 2024, were reviewed as part of the lending and investment tests, respectively. Investments with community development as a primary purpose funded during a prior evaluation period, that were still outstanding as of March 31, 2024, were also considered. Lastly, community development services that occurred during the evaluation period were reviewed as part of the service test evaluation.

A summary of the scope of the examination is listed in Appendix A.

### *Examination Analysis*

Civista's CRA performance is being evaluated using the CRA examination procedures for large banks. As an interstate bank, Civista is subject to Section 109 of the Riegle-Neal Interstate Banking and Branching Efficiency Act,<sup>7</sup> and the scope of this evaluation includes a full-scope evaluation of at least one AA in each state where Civista has deposit-taking facilities. The following criteria was considered in this evaluation: 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 LMI geographies, volume of community development activity, and other non-financial considerations. Where comparable activity was noted, full-scope AAs not selected at the previous examination were considered.

This evaluation of Civista's lending record in individual AAs includes the utilization of and comparison to demographic characteristics. The primary sources for demographic data are the U.S. Census Bureau and Dun & Bradstreet.<sup>8</sup> Demographic characteristics of a particular AA are useful in analyzing a financial institution's lending record, as they provide a means of estimating loan demand and identifying lending opportunities. To understand small business demand, self-reported data on revenue size and geographic location from business entities are collected and published by Dun & Bradstreet. The demographic data should not be construed as defining an expected level of lending in a particular area or to a particular group of borrowers. The data, along with housing and economic conditions information, is used to establish performance context and evaluate Civista accordingly.

The geographic distribution of HMDA-reportable loans is assessed by comparing the percentage of loans originated in each income category (low-, moderate-, middle-, and upper-income) to the

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<sup>7</sup> Section 109 of the Act prohibits a bank from establishing or acquiring a branch or branches outside its home state primarily for the purpose of deposit production.

<sup>8</sup> Demographic data: Includes 2022 / 2023 American Community Survey (ACS) and Dun & Bradstreet data, plus the most current census data available. American Community Survey (ACS) data is part of the U.S. Census Bureau's Decennial Census Program and is designed to provide more current demographic, social, economic, and housing estimates throughout the decade - <https://dataferrett.census.gov/AboutDatasets/ACS.html>

percentage of owner-occupied units in each geographic income category. Small business loans are compared to the percentage of small business loans within each geographic income category.

Loans are evaluated to determine the lending activity inside and outside Civista's AAs. In addition, loans inside the AA are evaluated based on the geographic and borrower income distribution for each AA. The geographic distribution of HMDA loans is assessed by comparing the percentage of loans originated in each geography type (low-, moderate-, middle-, and upper-income) to the percentage of owner-occupied units in each geography type. Small business loans are compared to the percentage of small businesses within each geographic income category.

Borrower distribution received greater weight than geographic distribution in this evaluation, since the overall percentage of LMI families was greater than LMI geographies, unless stated otherwise.

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.

Civista's lending performance was also compared to the performance of aggregate lenders in 2022 and 2023 separately. Aggregate lenders include all lenders required to report HMDA-reportable and CRA-reportable small business lending data within the respective AAs. At the time of evaluation, only 2022 aggregate data was available for CRA-reportable loans. Lending market share is also discussed to give a better understanding of where Civista ranks within the respective areas. For retail services, Civista's branch distribution analysis was conducted using data as of December 31, 2023.

Community development activities were reviewed to determine whether they have community development as a primary purpose and meet the geographic requirements of CRA. The eligibility of a loan, investment, or service is based on demographic information available to Civista at the time the community development activity was undertaken. Qualified community development activities were analyzed from quantitative and qualitative perspectives to better understand the volume of activity impacting a particular AA, the innovativeness of those activities, and the responsiveness to local community development and credit needs. When appropriate, peer comparisons were conducted using annualized metrics to gauge the relative performance of the institution in a particular AA.

To better understand AA community development and credit needs, several sources were utilized, including publicly accessible data, information submitted by Civista, and plans describing the community development environment in local markets. Four community contact interviews were conducted with representatives from affordable housing, economic development, and community and social service agencies operating inside Civista's AAs. These individuals have expertise in their respective fields and are familiar with the economic, social,

and demographic characteristics and community development opportunities in the AA. Information obtained from these interviews helped establish a context for the communities in which Civista operates and gather information on its performance.

Community contacts identified lack of affordable housing and rising home prices and rents as the area's most critical challenges; followed by workforce development, public transportation, affordable childcare, and other wraparound services for struggling individuals and families impacted by the increased cost of living. Lastly, the contacts identified several opportunities for bank participation. More detailed information obtained from individual community contacts is included in the "Description of the Institution's Operations" section for each full-scope AA.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

Civista's overall CRA performance is rated Satisfactory. Details are provided below, including facts, data, and analyses used to form conclusions regarding the lending, investment, and service test performance ratings. Civista's CRA program includes a CRA strategy to assist the bank in focusing on meeting the credit, service, and community development needs of its AA. Civista continues to work on ways to strengthen community engagement to help identify unmet community development needs.

### **Lending Test**

Civista's lending test performance is rated High Satisfactory. The overall penetration of loans among borrowers of different income levels is good; and the distribution among businesses of different sizes is excellent. The geographic distribution of loans is excellent, with moderate gaps in lending. Civista makes a relatively high level of community development loans and makes use of flexible lending programs. As discussed earlier, Civista's performance in Nonmetropolitan Ohio had the greatest impact on the overall lending performance. Lending test performance is High Satisfactory in Ohio and Indiana.

While Civista's lending distribution by borrower income and geography is referenced throughout this report, detailed information about HMDA-reportable and CRA-reportable loans can be found in Appendix E for full-scope and Appendix G for limited-scope AAs, respectively. In some AAs and product discussions, specific numbers are quoted from these tables to support relevant points; otherwise, general references are made about performance, and the reader should refer to the appendices for specific data.

### ***Lending Activity***

Civista's lending activity reflects a good responsiveness to the credit needs of its AAs, taking into consideration its strategic objectives, economic conditions, and competitive factors. During the evaluation period, the majority of loans originated by volume and dollar amount were made in Civista's delineated AAs; however, small concentrations of lending in excluded counties were

identified within the Akron, Dayton, and Cincinnati MSAs and a moderate concentration in the Cleveland MSA.

As the data shows in the table below, Civista originated more HMDA-related loans by number and dollar amount than small business-related loans; as a result, HMDA-related lending typically had a greater impact on lending ratings. Overall lending was considered responsive to credit needs in all AAs, commensurate with deposits, and no conspicuous gaps in lending activity by income category were identified. Detailed information about lending activity can be found in each of the state sections of this report.

### *Assessment Area Concentration*

The following table shows the number and percentage of loans located inside and outside of Civista's AAs by loan type. As indicated below, Civista originated an adequate percentage of the total loans by volume (78.2%) and by dollar amount (68.5%) to borrowers and businesses located within its AAs.

Lending Inside and Outside the Assessment Area								
Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	205	88.4	\$21,347	86.9	27	11.6	\$3,208	13.1
Home Purchase - Conventional	1,064	73	\$260,719	68.3	394	27	\$120,758	31.7
Home Purchase - FHA	53	67.9	\$9,471	63.2	25	32.1	\$5,525	36.8
Home Purchase - VA	6	54.5	\$1,824	56.7	5	45.5	\$1,394	43.3
Multi-Family Housing	33	60	\$54,435	48.8	22	40	\$57,225	51.2
Other Purpose Closed-End	4	100	\$514	100	0	0	\$0	0
Other Purpose LOC	678	82.1	\$64,943	80.1	148	17.9	\$16,134	19.9
Refinancing	618	84	\$91,142	78.9	118	16	\$24,396	21.1
<b>Total HMDA related</b>	<b>2,661</b>	<b>78.3</b>	<b>\$504,395</b>	<b>68.8</b>	<b>739</b>	<b>21.7</b>	<b>\$228,640</b>	<b>31.2</b>
Small Business	404	76.5	\$84,549	65.9	124	23.5	\$43,759	34.1
<b>Total Small Bus. related</b>	<b>404</b>	<b>76.5</b>	<b>\$84,549</b>	<b>65.9</b>	<b>124</b>	<b>23.5</b>	<b>\$43,759</b>	<b>34.1</b>
Small Farm	53	89.8	\$6,028	81.7	6	10.2	\$1,346	18.3
<b>Total Small Farm related</b>	<b>53</b>	<b>89.8</b>	<b>\$6,028</b>	<b>81.7</b>	<b>6</b>	<b>10.2</b>	<b>\$1,346</b>	<b>18.3</b>
<b>TOTAL LOANS</b>	<b>3,118</b>	<b>78.2</b>	<b>\$594,972</b>	<b>68.5</b>	<b>869</b>	<b>21.8</b>	<b>\$273,745</b>	<b>31.5</b>

Note: Affiliate loans not included

Civista originated 78.3% of HMDA-related loans by volume and 68.8% by dollar amount and 76.5% of small business loans by volume and 65.9% by dollar amount located inside its AAs.

### *Distribution of Lending by Borrower Income, Business Revenue Size, and Geography*

The distribution of loans among borrowers of different income levels is good and excellent among businesses of different sizes. HMDA-reportable lending to borrowers of different income levels is good in Ohio and Indiana. The distribution of lending among businesses of different revenue sizes is excellent in Ohio and in Indiana.

The overall geographic distribution of loans reflects excellent penetration throughout the AAs with a moderate level of lending gaps. Geographic distribution is excellent in Ohio and in

Indiana. A moderate level of lending gaps was identified in Ohio and no gaps in lending identified in Indiana.

### *Community Development Loans*

Civista originated or renewed 41 community development loans totaling approximately \$76.8 million. This represents a significant increase by dollar amount since the previous evaluation considering the time period for this evaluation. The following table reflects the total number community development loans by purpose, number, and dollar amount.

<b>Purpose of CD Loan</b>	<b>#</b>	<b>\$</b>
Affordable Housing	39	\$74,708,400
Revitalization/Stabilization	1	\$2,000,000
Services to LMI	1	\$100,000
<b>Total</b>	<b>41</b>	<b>\$76,808,400</b>
<i>Totals include CD loans that benefit broader regional areas</i>		

Community development loans primarily addressed affordable housing and supported at least 1,583 housing units (144 subsidized/1,439 unsubsidized) for LMI individuals and families within the bank's AAs. The community services loan provided funding to support a shelter for individuals struggling with homelessness in Nonmetropolitan Indiana. Community contacts emphasized all aspects of affordable housing as a critical need across AAs; the majority of community development loans supported these expressed needs. Also, consideration was given to six community development loans that benefited the broader regional area in Ohio. These loans supported 394 affordable housing (123 subsidized/271 unsubsidized) units and revitalization/stabilization of a blighted property.

Because Civista has been responsive to community development needs and opportunities across its AAs, consideration was given to five community development loans totaling \$4.1 million supporting affordable housing in the broader regional area in the Cincinnati MSA (Campbell and Kenton counties in Kentucky) in LMI, unknown-, and middle-income tracts. These loans helped small-scale developers renovate several multi-family dwellings with at least 116 units of unsubsidized affordable rents and represent 5.3% of Civista's qualified community development lending by dollar amount.

The majority of community development loans by dollar amount were made in Ohio (94.5%), compared to the percentage of total lending at 77.6%. The remaining 0.2% of community development loans were made in Indiana, compared to the percentage of total lending at 22.4%. While community contacts stressed the critical need for all aspects of affordable housing, Civista only made five affordable housing loans totaling \$3.7 million in Nonmetropolitan Ohio and no community development loans in the Dearborn AA. Civista has the capacity and market presence in Nonmetropolitan Ohio (ranked first with 17.7% of deposit market share) and the Dearborn AA (ranked first with 40.4% of deposit market share) to be more responsive to

community development opportunities, including the ability to make loans that address a wider range of community development needs. Besides affordable housing, community contacts expressed the need for more funding for childcare services, healthcare services, financial literacy training, workforce development, public transportation, and economic development. While the lack of community development lending in these AAs impacted the outcome of the analysis, considering the significant increase in community development lending since the previous evaluation and the responsiveness to credit needs of LMI individuals, Civista makes a relatively high level of community development loans. Specifically, Civista makes a relatively high level of community development loans in Ohio and few, if any community development loans in Indiana.

More information on individual community development loans can be found in the full-scope AA sections of this report.

### *Flexible Lending Practices<sup>9</sup>*

Civista makes use of flexible lending practices in serving credit needs of borrowers in LMI geographies and to LMI borrowers throughout its AA. These programs are primarily designed to assist first-time homebuyers with needed down payment or closing costs or small businesses with access to capital.

- Community View – Civista introduced an LMI mortgage product in 2019. Community View focuses on providing affordable home ownership for LMI borrowers by expanding underwriting for non-traditional credit and reducing out-of-pocket expenses. Qualified borrowers can borrow up to 100 percent of the home's purchase price, no private mortgage insurance is required, eligible first-time homebuyers may receive up to three percent of the home's purchase price for down payment assistance (up to \$3,000), and assistance to pay for a required course (up to \$500). For properties located in LMI areas, there is no income limitation. For properties located outside LMI areas, the applicant(s) income cannot exceed 80 percent of the Federal Financial Institutions Examination Council's (FFIEC) estimated median family income for the property location. Overall, Civista originated 153 Community View loans totaling \$23.2 million within its AAs, and 43.8% of the loans by volume and 43.2% by dollar amount were originated in LMI geographies.
- Federal Home Loan Bank (FHLB) of Cincinnati Welcome Home Program: The FHLB program provides down payment assistance to LMI individuals funded through direct subsidies from member banks. Civista disbursed \$632,500 in grants to 43 qualifying LMI homebuyers through this program, of which 12 (27.9%) grants totaling \$157,500 (24.9%) were originated in LMI geographies.
- Fannie Mae / Federal Housing Administration (FHA) / U.S. Department of Veterans Affairs (VA) -Insured Loan programs: These government-insured loan programs offer

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<sup>9</sup> Unlike other large bank CRA performance criteria, a lack of innovative and/or flexible lending practices does not necessarily impact the bank's performance negatively. These activities are largely used to augment consideration given to an institution's performance under the quantitative criteria.

flexible long-term financing to eligible borrowers with low or no down payments. During the evaluation period, Civista originated four loans through these programs totaling approximately \$565,000, of which two (50.0%) loans totaling and \$226,000 (40.0%) were originated in LMI geographies.

Use of these products in serving LMI individuals and LMI communities was considered when there was sufficient volume. Civista makes use of flexible lending practices in comparison to demographic comparators in serving AA credit needs in Nonmetropolitan Ohio. Flexible lending practices augmented the bank's performance in Ohio. There was not enough volume to evaluate flexible lending practices in the Toledo or Dearborn AAs.

### **Investment Test**

Civista's performance under the investment test is rated Outstanding. Civista has an excellent level of qualified community development investments, donations, and grants and makes occasional use of complex investments to support community development initiatives. Investment test performance is Outstanding in Ohio and Low Satisfactory in Indiana.

Civista has \$20.8 million in qualified community development investments. This represents a significant increase by dollar amount since the previous evaluation considering the time period for this evaluation. 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	25	\$16,618,830
Economic Development	1	\$2,250,000
Services to LMI	4	\$1,295,000
Revitalization/Stabilization	2	\$645,000
<b>Total</b>	<b>32*</b>	<b>\$20,808,830</b>
<i>*Total count does not consider investments allocated to multiple AAs Total includes investments that benefit broader regional area</i>		

Civista obtained three new investments worth \$6.0 million, representing 28.8% of total qualified investments. These investments are in Ohio equity funds that provide capital for the Low-Income Housing Tax Credit (LIHTC) projects in the Akron, Cleveland, Columbus, and Dayton AAs. Civista also has prior period Ohio equity investments with unfunded commitments totaling approximately \$1.3 million. These legally binding unfunded commitments represent 6.4% of total qualified investments. Equity investments support LIHTC projects across Ohio, including the bank's AAs. Prior period investments also include mortgage-backed securities, CRA loan pools, municipal bonds, and revenue bonds with a book value of approximately \$13.5 million, representing 64.8% of total qualified investments. These investments help to support affordable housing, LMI school districts, and economic development in Ohio and infrastructure



improvements and LMI school districts in Indiana. Because Civista was responsive to community development needs in its AAs, consideration was also given to three mortgage-backed securities that supported affordable housing across the broader regional area in Ohio.

The majority of qualified investments at 91.9% benefited Ohio. The remaining 8.1% benefited Indiana. Community contacts expressed the critical need for affordable housing across the bank's AAs. These investments help to address these expressed needs. LIHTC investments are considered complex; therefore, Civista makes occasional use of complex investments to support community development initiatives in Ohio.

Qualified investments also took the form of small dollar donations totaling \$105,275 and 43 Welcome Home grants totaling \$632,000. Civista partners with a wide array of organizations and nonprofits to fund initiatives primarily aimed at responding to community needs and improving the financial stability of individuals and families. The following table reflects the total number of donations by purpose, number, and dollar amount.

Purpose of CD Donation	#	\$
Services to LMI	56	\$80,275
Affordable Housing	3	\$13,000
Revitalization/Stabilization	4	\$11,500
Economic Development	1	\$500
<b>Total</b>	<b>64</b>	<b>\$105,275</b>
<i>Totals include donations that benefit broader regional area</i>		

Approximately 76.9% of Civista's small dollar donations by dollar amount benefited Ohio and 23.1% benefited Indiana. Community contacts expressed the critical need for affordable housing and wraparound services for LMI individuals and families across the bank's AAs. These donations help address these expressed needs. Because Civista was responsive to community development needs in its AAs, consideration was given to two small dollar donations that supported services to LMI in the broader regional area in Ohio.

Civista also processed and disbursed 43 Welcome Home grants totaling \$632,000 (83.4% in Ohio and 16.6% in Indiana) in its AAs. The FHLB of Cincinnati's Welcome Home Program offers grants (up to \$20,000) to assist LMI homebuyers with down payments and closing costs when purchasing their primary residence.

Approximately 91.6% of Civista's qualified investments, donations, and grants by dollar amount benefited Ohio, compared to the percentage of total deposits at 80.0% and total branches at 80.5%. The remaining 8.4% of qualified investments, donations, and grants by dollar amount benefited Indiana, compared to the percentage of total deposits at 20.0% and total branches at 19.5%. Civista has an excellent level of qualified investments, donations, and grants in Ohio and a poor



level in Indiana.

More information detailing specific investments and contributions can be found in the full-scope AA sections of this report.

### **Service Test**

Civista's performance under the service test is rated High Satisfactory. Retail delivery systems are reasonably accessible, and Civista provides a relatively high level of community development services. Service test performance is High Satisfactory in Ohio and Low Satisfactory in Indiana.

### ***Retail Services***

In addition to its main office with a full-service ATM, Civista operates 27 branches with full-service ATMs, nine branches with cash-only ATMs, and four branches without an ATM. As a result of Comunibanc acquisition in July 2022, Civista acquired six branches in Nonmetropolitan Ohio in Henry County<sup>10</sup> and a branch in the Toledo AA in Wood County. Civista also opened a new branch in Columbus AA. Civista has not closed any branches since the previous evaluation. Civista's record of opening and closing branches has not adversely affected the accessibility of its delivery systems. Civista also operates four stand-alone, cash-only ATMs; two in Nonmetropolitan Ohio and two in the Dearborn AA.

Lastly, Civista operates two loan production offices, one in the Cleveland-Elyria MSA in Westlake (Cuyahoga County) in an upper-income tract, and one outside its delineated CRA AA in the Cincinnati OH-KY-IN MSA in Lakeside Park, Kentucky (Kenton County).

Overall retail delivery systems are reasonably accessible to Civista's geographies and individuals of different income levels. However, only 17.0% of Civista's branches serve LMI geographies, compared to 36.4% of total LMI tracts across the bank's delineated AAs. Specifically, Civista has one branch (2.4%) in a low-income tract and six branches (14.6%) in moderate-income tracts. Civista's retail delivery systems performance is primarily driven by the distribution of branches in Ohio where the bank has most of its branches. Nonmetropolitan Ohio is the only AA in Ohio with branches (four branches) in moderate-income tracts. The remaining six urban AAs have no branches in LMI tracts, while 96.0% of LMI tracts in Ohio are in these AAs. However, Civista has a minimal presence in these competitive markets. Conversely, retail delivery systems are readily accessible in Indiana where Civista has one branch in a low-income tract and two branches in moderate-income tracts in the Dearborn AA. Civista's retail delivery systems are reasonably accessible in Ohio and readily accessible in Indiana. The geographic distribution of Civista's branches and ATMs as of December 31, 2023, is shown in the table below.

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<sup>10</sup> Civista added Henry County to its Nonmetropolitan Ohio AA at time of merger (July 2022).

Geographic Distribution of Branches & ATMS

All Assessment Areas

Tract Category	Branches							ATMs										
	Total Branches				Drive- thrus	Extended Hours	Weekend Hours	Total ATMs			Full Service ATMs				Cash only ATMs			
	#	%	Open	Closed				#	%		#	%	Open	Closed	#	%	Open	Closed
Low	1	2.4%	0	0	1	1	1	Total	1	2.4%	1	3.6%	0	0	0	0.0%	0	0
DTO	0		0	0	0			SA	0		0		0	0	0		0	0
Moderate	6	14.6%	2	0	6	2	5	Total	6	14.6%	4	14.3%	2	0	2	15.4%	0	0
DTO	0		0	0	0			SA	0		0		0	0	0		0	0
Middle	18	43.9%	3	0	17	11	17	Total	19	46.3%	13	46.4%	1	0	6	46.2%	0	0
DTO	0		0	0	0			SA	3		0		0	0	3		0	0
Upper	15	36.6%	3	0	14	5	14	Total	14	34.1%	9	32.1%	1	0	5	38.5%	0	0
DTO	0		0	0	0			SA	1		0		0	0	1		0	0
Unknown	1	2.4%	0	0	1	0	0	Total	1	2.4%	1	3.6%	0	0	0	0.0%	0	0
DTO	0		0	0	0			SA	0		0		0	0	0		0	0
Total	41	100%	8	0	39	19	37	Total	41	100%	28	100%	4	0	13	100%	0	0
DTO	0		0	0	0			SA	4		0		0	0	4		0	0

Based on 2023 FFIEC Census Data

Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

Banking services do not vary in a way that inconveniences any portion of Civista's AAs. Civista's banking centers are generally open six days a week and provide lobby and/or drive-thru services full days Monday through Friday (9:00 a.m. to 5:00 p.m.) and half days on Saturday (9:00 a.m. – 12:00 p.m.). 39 offices offer drive-thru services, 19 offices offer extended hours until 5:30 p.m. during the week, and 37 offices offer weekend hours; including branches serving moderate-income areas.

Civista offers a variety of alternative delivery systems to supplement its branch and ATM network. Alternative delivery systems primarily consist of website ([civista.bank](https://www.civista.bank)) and mobile banking applications that allow for standard online banking capabilities (mobile deposits, security alerts/notifications, BillPay Plus, e-Statements, person-to-person pay, Apple Pay, Samsung Pay, Google Pay, and Android Pay).

Civista has seen an upward trend in digital banking enrollment, especially in mobile deposits and BillPay Plus. Mobile deposit enrollment increased by 32.8% and is trending to increase again in 2024. Bill Pay Plus enrollments increased by 22.1% and are also trending to continually increase in 2024. Both eBill Subscribers and eBill Payees have remained relatively steady throughout the evaluation period. Civista 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, and telephone banking services are available to all bank customers regardless of location or income.

Civista developed the One Choice Checking specialized checking account product for individuals who have been reported to ChexSystems by a financial institution. Consumers are allowed to open the account regardless of a negative ChexSystems record considering a charged-off balance has been paid in full. The checking account requires a \$50.0 opening requirement along with a \$12 monthly non-waivable service charge. The account provides full access to checking, ATM, and debit card services. After 12 months of maintaining the One Choice Checking account in good standing, the customer may request to move into a different checking account. Good standing is considered by making a deposit at least once every 30 calendar days to maintain a positive end-of-day balance including the payment of all bank fees and charges. These types of accounts tend to help disenfranchised consumers find safe and affordable bank accounts. During the evaluation period, Civista opened 125 One Choice Checking accounts with a current balance of \$105,000.

### *Community Development Services*

Civista provides a relatively high level of community development services throughout its AAs, with 878 hours of community development services supporting various service activities during the evaluation period. This represents a significant increase by dollar amount since the previous evaluation considering the time period for this evaluation. Community development service hours equate to 0.4 annualized persons (ANP).<sup>11</sup>

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	390	61	65	752
Affordable Housing	33	6	9	76
Economic Development	38	9	7	50
<b>Total</b>	<b>461</b>	<b>76</b>	<b>81</b>	<b>878</b>
<i>Totals include services that benefit broader regional area</i>				
<i>*Some employees may be double-counted if performed more than one service</i>				

Civista's directors, officers, and staff members provided their financial expertise to the community by engaging in activities that promoted or facilitated services for LMI individuals, affordable housing, and economic development.

Approximately 94.0% of Civista's community development services benefited Ohio, compared to the percentage of total branches at 80.5%. The remaining 6.0% of community development services benefited Indiana, compared to the percentage of total branches at 19.5%. Civista provides a relatively high level of community development services in Ohio and a limited level in Indiana. Because Civista was responsive to community development needs in its AAs,

<sup>11</sup> Annualized Persons (ANP): Number CD qualified service hours divided by 2,000 work hours in a year

consideration was given to 70 community development services (93 hours) that supported services to LMI individuals and economic development across the broader regional area in Ohio.

Community development services include the following:

*Financial Education* - Civista developed and launched the Learning Vault, an online financial education platform accessed from the bank's website in 2020 in response to the COVID-19 pandemic and limited opportunities to hold in-person financial literacy sessions. The Learning Vault offers quick and easy online learning modules to help individuals build financial knowledge. A variety of courses are offered online focusing on topics such as budgeting basics, healthy financial habits, building emergency savings, identity protection, credit scores and reports, buying a home, planning for retirement, college financing, and preventing elder financial abuse. All learning modules are available in English and Spanish.

Civista continues to partner with Everfi, a for-profit company that partners with banks to deploy online financial education for students. These courses are available through in-person financial education events and the Civista Learning Vault. The Achieve curriculum offers students, adults, and entrepreneurs over 30 digital modules of learning covering financial wellness in uncertain times, financial foundations, investing in your future, financial caregiving, building financial capacity, owning a home, preparing for retirement, and small business essentials.

*Board and Committee Memberships* - Civista officers and managers provided financial expertise through their involvement with community development organizations throughout the AAs by serving as executive directors, presidents, board members, loan committee members, or treasurers.

*Technical Assistance* - Civista's employees provided technical assistance to community development and nonprofit organizations. Technical assistance included fund raising, evaluating prospective home buyers, and reviewing loan application requests and income guidelines to qualify for different types of lending programs for LMI borrowers.

## **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.

## STATE OF OHIO

### CRA RATING for the State of Ohio:<sup>12</sup> **SATISFACTORY**

The lending test is rated: High Satisfactory

The investment test is rated: Outstanding

The service test is rated: High Satisfactory

The major factors supporting this rating include:

- A good responsiveness to credit needs;
- A good distribution of loans among borrowers of different income levels and an excellent distribution to businesses of different revenue sizes;
- An excellent geographic distribution of loans throughout the AA;
- A good record of serving the credit needs of low-income individuals and areas and very small businesses exhibited;
- A relatively high level of community development loans;
- Makes use of flexible lending practices in serving the AA's credit needs;
- An excellent level of qualified community development investments and grants;
- Occasional use of complex use of complex investments;
- Retail delivery systems are reasonably accessible to all geographies and individuals of different income levels and businesses of different revenue sizes;
- A record of opening and closing banking centers that has not adversely affected the accessibility of delivery systems;
- Banking services and hours do not vary in a way that inconveniences any portions of the AAs; and,
- Provides a relatively high level of community development services.

## SCOPE OF EVALUATION

Full-scope reviews were conducted for Nonmetropolitan Ohio and the Toledo MSA. The period and products evaluated for these AAs are consistent with the scope discussed in the "Institution" section of this report.

A limited-scope review was conducted for the Akron, Cleveland, Columbus, Dayton, and Mansfield AAs.

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<sup>12</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Borrower distribution received greater weight than geographic distribution in determining the CRA rating for the state. Nonmetropolitan Ohio received greater weight since it had the largest lending volumes and number of banking centers, and ranks first in the institution's share of lending, deposits, and branches during the evaluation period; followed by the Toledo AA.

## **DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE STATE OF OHIO**

Lending activity accounted for 77.6% of Civista's total lending and deposits accounted for 80.0% of Civista's total deposits. HMDA-reportable lending in Ohio represented 75.3% of Civista's total HMDA lending and CRA-reportable lending represented 92.6% of Civista's total CRA lending. As of June 30, 2023, Civista ranks 18<sup>th</sup> among 199 insured institutions and has a deposit market share of 0.4% in Ohio.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF OHIO**

### **Lending Test**

Civista's performance under the lending test in Ohio is rated High Satisfactory. Primary ratings drivers include making a relatively high level of community development loans, use of flexible lending products, and a good responsiveness to AA credit needs.

Civista's performance under the lending test is excellent in the Akron AA, good in Nonmetropolitan Ohio and the Cleveland and Columbus AAs, and adequate in the Toledo, Dayton, and Mansfield AAs.

### ***Lending Activity***

Civista originated 2,003 HMDA loans totaling \$416.5 million, 374 small business loans totaling \$77.8 million during the evaluation period in Ohio. Civista's percentage of total lending in Ohio is 77.6%, which is greater than the percentage of total deposits at 80.0%.

Civista's lending activity reflects good responsiveness to the credit needs across its AAs in Ohio, taking into consideration economic conditions and competitive factors. Lending activity is excellent in the Akron, Cleveland, Columbus, and Toledo AAs and adequate in the Dayton and Mansfield AAs and Nonmetropolitan Ohio.

While no substantial concentration of loans was identified in excluded counties in MSAs within the bank's delineated footprint, a small concentration of loans was identified in the Akron and Dayton MSAs and a moderate concentration was identified in the Cleveland MSA. Civista originated:

- Nine HMDA loans in Portage County in the Akron MSA. This represents 8.3% of HMDA loans originated in the MSA during the evaluation period.
- Eight loans in Greene County in the Dayton MSA. This represents 12.3% of HMDA loans originated in the MSA during the evaluation period.
- 47 loans in Lorain County in the Cleveland MSA. This represents 17.2% of HMDA loans originated in the MSA during the evaluation period.

### ***Borrower-Income, Business Revenue Size, and Geography***

The overall distribution of loans among borrowers of different income levels is good and excellent to businesses of different sizes. HMDA-reportable lending to borrowers of different income levels is good in Nonmetropolitan Ohio and the Mansfield AA; adequate in the Akron, Columbus, Dayton, and Toledo AAs; and poor in the Cleveland AA. The penetration among businesses of different sizes is excellent in Nonmetropolitan Ohio and the Akron, Cleveland, Columbus, and Toledo AAs; good in the Mansfield AA; and adequate in the Dayton AA. The overall geographic distribution of loans reflects an excellent penetration in Ohio with a moderate level of lending gaps. The overall geographic distribution of loans is excellent in Nonmetropolitan Ohio and the Akron and Cleveland AAs; good in the Toledo AA; and adequate in the Columbus, Dayton, and Mansfield AAs. Nonmetropolitan Ohio had a moderate level of lending gaps, and the Toledo AA had a significant level of lending gaps.

Lastly, Civista exhibits a good record of serving the credit needs of low-income individuals and areas and businesses with gross annual revenue of \$1.0 million or less in Ohio.

A detailed analysis for the borrower-income distribution and geographic distribution is provided with the analysis for each AA.

### ***Community Development Loans***

Civista originated 35 community development loans totaling \$72.6 million. The majority of community development loans by dollar amount were made in Ohio (94.5%), compared to the percentage of total lending at 77.6%.

Community development loans in the bank's AAs in Ohio primarily addressed affordable housing and supported at least 1,583 housing units (144 subsidized/1,439 unsubsidized) for LMI individuals and families. Community contacts emphasized all aspects of affordable housing as a critical need across AAs; community development loans supported these expressed needs.

While community contacts stressed the critical need for all aspects of affordable housing, Civista has the capacity to make loans that address a wider range of community development needs across its AAs. Specifically, in Nonmetropolitan Ohio Civista only made an adequate level of community development loans that only supported unsubsidized affordable housing. Considering Civista ranks first among 38 financial institutions with a 17.7% market share of



deposits, Civista has the capacity and market presence to be more responsive to a wider range community development opportunities. While Civista has limited market presence in the six remaining urban AAs, Civista was able to originate community development loans that supported subsidized housing in the Akron AA (144 subsidized units/332 unsubsidized units) and exceeded the percentage of total lending in the Columbus, Cleveland, and Akron AAs, respectively. However, community development loans in the Columbus and Cleveland AAs only supported unsubsidized affordable housing (771 units). As a result, Civista is a leader in making community development loans in the Akron AA and makes a relatively high level of community development loans in the Cleveland and Columbus AAs. Civista makes an adequate level of community development loans in Nonmetropolitan Ohio and the Toledo and Dayton AAs. Lastly, Civista makes few, if any community development loans in the Mansfield AA.

Because Civista has been responsive to community development needs and opportunities across its AAs in Ohio, consideration was given to six community development loans totaling \$24.8 million that benefited counties within the broader regional area. These loans represent 32.3% of total community development lending by dollar amount.

#### **Affordable Housing**

- Two loans totaling \$6.9 million supported at least 123 subsidized housing units for LMI individuals and families in LMI geographies in Lorain and Stark counties.
- Three loans totaling \$15.9 million supported at least 271 units of unsubsidized housing for LMI individuals and families in LMI and upper-income geographies in Butler, Hamilton, and Stark counties.

#### **Revitalization/Stabilization**

- One loan totaling \$2.0 million to restore a blighted property and long-vacant building in a historic neighborhood in Hamilton County. This mixed-use space combines residential (82 market-priced units) and commercial/retail space, including a restaurant and retail shops.

The lack of community development lending in Nonmetropolitan Ohio impacted the outcome of the analysis; however, considering the significant increase in community development lending since the previous evaluation and responsiveness to credit needs of LMI individuals in a majority of its AAs, Civista makes a relatively high level of community development loans in Ohio.

#### ***Flexible Lending***

Civista makes use of flexible lending practices in Nonmetropolitan Ohio. There was not enough volume to evaluate flexible lending practices in the Toledo AA.

## **Investment Test**

Civista's performance under the investment test in Ohio is rated Outstanding.

Civista has an excellent level of qualified community development investments, donations, and grants and makes occasional use of complex investments to support community development initiatives in Ohio.

Civista obtained new investments worth \$6.0 million, representing 28.8% of total qualified investments. These investments are in Ohio equity funds that provide capital for LIHTC projects in the Akron, Cleveland, Columbus, and Dayton AAs. Civista also has prior period equity investments with legally binding unfunded commitments totaling approximately \$1.3 million, representing 6.4% of total qualified investments. Unfunded commitments support LIHTC projects across Ohio, including the bank's AAs. Prior period investments also include mortgage-backed securities, CRA loan pools, municipal bonds, and revenue bonds with a book value of approximately \$11.8 million, representing 56.6% of total qualified investments. These investments help support affordable housing, LMI school districts, and economic development in the bank's AAs in Ohio.

Because Civista has been responsive to community development needs and opportunities across its AAs, consideration was given to three prior period mortgage-backed securities with a book value of approximately \$124,445 that supported affordable housing initiatives in the broader regional Dayton area.

The majority of qualified investments at 91.9% benefited Ohio. Community contacts expressed the critical need for affordable housing across the bank's AAs. These investments help to address these expressed needs. LIHTC investments are considered complex; therefore, Civista makes occasional use of complex investments to support community development initiatives in Ohio.

Qualified investments also took the form of small dollar donations totaling \$80,975. Approximately 76.9% of Civista's small dollar donations by dollar amount benefited Ohio. Community contacts expressed the critical need for affordable housing and wraparound services for LMI individuals and families across the bank's AAs. The majority of donations help address these expressed needs. Since Civista was responsive to community development needs in its AAs, consideration was given to two small dollar donations totaling \$800 that supported LMI individuals and families dealing with food insecurity in the broader regional Cincinnati area.

Civista also processed and disbursed 37 Welcome Home grants totaling \$527,000 (83.4%) in its AAs. The FHLB of Cincinnati's Welcome Home Program offers grants (up to \$20,000) to assist LMI homebuyers with down payments and closing costs when purchasing their primary residence.

Approximately 91.6% of Civista's qualified investments, donations, and grants by dollar amount benefited Ohio, compared to the percentage of total deposits at 80.0% and total branches at 80.5%. Civista has an excellent level of qualified community development investments and contributions in the Akron, Cleveland, Columbus, and Dayton AAs, a significant level in Nonmetropolitan Ohio, and poor levels in the Toledo and Mansfield AAs.

Additional information regarding performance under the investment test is provided in the respective analyses for each AA.

### **Service Test**

Civista's performance under the service test in Ohio is rated High Satisfactory. Retail services are reasonably accessible, and Civista provides a relatively high level of community development services in Ohio.

For details regarding the institution's performance in the individual AAs, refer to the respective AA's "Service Test" section in this report.

### ***Retail Services***

Civista maintains its main office with a full-service ATM, 21 branches with full-service ATMs, seven branches with cash-only ATMs, and four branches without ATMs in Ohio, representing 80.5% of the bank's total branches.

Since the previous evaluation, Civista opened a branch in the Columbus AA in Columbus (Franklin County) in an upper-income tract. Civista also acquired seven branches as a result of the acquisition of Comunibanc in 2022. Six of these branches are in Nonmetropolitan Ohio in moderate-, middle-, and upper-income tracts and the remaining branch is in the Toledo AA in a middle-income tract. Civista has not closed any branches during the evaluation period. As a result, Civista's record of opening and closing branches has not adversely affected the accessibility of its delivery systems. However, accessibility of delivery systems improved in Nonmetropolitan Ohio with two acquired branches serving moderate-income tracts. Lastly, Civista has two stand-alone cash-only ATMs in Nonmetropolitan Ohio.

Civista's retail delivery systems performance is driven by the distribution of branches in Ohio where the bank has most of its branches. Overall, retail delivery systems are reasonably accessible to Civista's geographies and individuals of different income levels. Delivery systems are reasonably accessible in Nonmetropolitan Ohio and the Toledo AA and unreasonably inaccessible in the remaining five AAs. Nonmetropolitan Ohio is the only AA in Ohio with four branches in moderate-income tracts; while the remaining five urban AAs have no branches in LMI tracts, and 96.0% of LMI tracts in Ohio are in these AAs. Banking services do not vary or inconvenience any portion of Civista's AAs in Ohio. Thirty-one branches offer drive-thru

facilities, 12 branches offer extended hours, and 30 branches offer weekend hours of service, including the branches in moderate-income tracts.

### *Community Development Services*

Civista provides a relatively high level of community development services in Ohio, with 825 hours (94.0%) of community development services supporting various service activities during the evaluation period. Community development service hours in Ohio equate to 0.4 ANP.

Seventy (70) employees provided 437 services to 64 organizations that promote or facilitate community services targeted to LMI individuals, affordable housing initiatives, and economic development by financing small businesses in Ohio.

Community development services include 441 hours serving on boards/committees, 269 hours providing financial literacy training, and 115 hours of technical expertise to the community by providing leadership and engaging in activities promoting or facilitating services for LMI individuals, affordable housing, and economic development in the bank's AAs and broader regional area.

Civista is a leader in providing community development services in the Akron, Cleveland, and Columbus AAs; provides a relatively high level of community development services in Nonmetropolitan Ohio and the Dayton and Toledo AAs; and provides a limited level of community development services in the Mansfield AA.

Because Civista has been responsive to community development needs and opportunities in its AAs in Ohio, consideration was given to 70 community development services totaling 93 hours (10.6%) by four employees to four organizations in the broader regional Cincinnati area (Hamilton County) and the broader regional Cleveland area (Ashtabula County). Two employees served on boards/committees for two organizations that provide healthcare services to LMI individuals and to a large nonprofit in Cleveland that provides a multitude of wraparound services to LMI individuals. Two employees provided technical expertise in the form of fundraising and financial literacy education for a large nonprofit that provides mentoring to LMI children in Hamilton County. These community development services are included in the totals above.

**NONMETROPOLITAN AREA**  
*(Full-scope Review)***DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE  
NONMETROPOLITAN OHIO**

Nonmetropolitan Ohio consists of entireties of Champaign, Crawford, Erie, Henry, Huron, Logan, Sandusky and Seneca counties. Since the previous evaluation, Civista added Henry County after the acquisition of Comunibanc in 2022. The Census Bureau released new size and population data from the 2020 Census on August 12, 2021. Due to these changes, this AA was comprised of the following tracts for this analysis.

<b>Income Tract Designations</b>	
<b>Assessment Area: Nonmetropolitan Ohio</b>	
<b>Tract Income Level</b>	<b>2022-2023</b>
	<b>Number of Tracts</b>
Low	1
Moderate	18
Middle	63
Upper	20
Unknown	1
<b>Total</b>	<b>103</b>

Based on changes to the AA and 2020 Census data, the AA gained one low-, six middle-, and one upper-income tract(s). There were no changes to the number of low- and unknown-income tract(s) since the previous evaluation.

Distressed and underserved middle-income geographies are designated by the agencies<sup>13</sup> in accordance with interagency CRA regulations. The designations continue to reflect local economic conditions, including unemployment, poverty, and population change. The criteria for designating these areas are available on the Federal Financial Institutions Examination Council's (FFIEC) website.<sup>14</sup> No middle-income tracts were designated as distressed/underserved during the evaluation period. The tract with the unknown-income designation encompasses a portion of Lake Erie in Erie County.

As of June 30, 2023, the Federal Deposit Insurance Corporation (FDIC) summary of deposits report ranked Civista first among 38 financial institutions in the Nonmetropolitan Ohio counties in which the bank has branches with 17.7% of the deposit market share, compared to second ranked Sutton Bank with 16.1% and third ranked The Huntington National Bank with 6.6% of the

<sup>13</sup> The Board of Governors of the Federal Reserve System, Federal Deposit Insurance Corporation, and Office of the Comptroller

<sup>14</sup> FFIEC – Distressed or Underserved nonmetropolitan middle-income geographies

deposit market share. Deposits in this AA accounted for 62.8% of Community Trust's total deposits.

The 2023 HMDA peer market data shows that Civista ranked third among 318 reporters in Nonmetropolitan Ohio having originated 431 loans. The top two HMDA lenders in this market, The Huntington National Bank originated 585 loans and Rocket Mortgage, LLC originated 451 loans. Civista also ranked third among HMDA lenders in this market in 2022 and originated 603 loans. Civista's HMDA-reportable lending decreased by 28.5% from 2022 to 2023.

Civista ranked 10<sup>th</sup> among 83 CRA reporters serving Nonmetropolitan Ohio in 2023 having originated 128 loans. The top four CRA reporters in this market, American Express National Association originated 1,025 loans, JP Morgan Chase National Association originated 857 loans, Synchrony Bank originated 849 loans, and US Bank National Association originated 569 loans. Civista ranked 13<sup>th</sup> among CRA reporters in this market in 2022 and originated 115 loans. Civista's CRA-reportable (small business) lending decreased by 27.8% from 2022 to 2023.

### **Community Contacts**

There were two community contact interviews 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 first interview was with a representative from an organization that distributes funds (grants and scholarships) to nonprofit organizations to help them provide resources, assistance, and support to LMI individuals and families. The contact stated this community has a tourism-driven economy, which tends to drive up home and rental prices. Recent studies have predicted a bleak outlook for affordable housing with high occupancy rates and rental rates. In addition to the lack of available and affordable housing, the lack of childcare services also deters young professionals from living and working in this area. The contact indicated financial institutions are actively engaged in the community primarily through their leadership positions on nonprofit and community boards. The contact expressed the need for banks to continue to be more accessible and focus on all aspects of affordable housing and neighborhood banking by maintaining branches along bus routes in urban areas.

The second interview was a representative from a nonprofit that provides wraparound services to LMI individuals and families. The contact stated the local economy has seen growth and development post-COVID, including the opening of a new industrial park; however, finding qualified workers is a major challenge for local employers. The contact believes employers need to be more creative and adapt to the preferences of the new generation of workers who tend to be more selective and mobile. The contact emphasized that workforce development and lack of affordable housing are major challenges in the area, particularly for LMI individuals. The region struggles to attract and retain young professionals due to the lack of housing. The housing shortage is heightened for LMI individuals, making job attainment and career advancement difficult. While COVID rental relief temporarily benefited the region, landlords started increasing rents as rental assistance was lifted. The contact indicated there are opportunities for

financial institutions to continue providing financial literacy and offering more financial services targeted to LMI individuals.

### Population Characteristics

Population Change Assessment Area: Nonmetropolitan Ohio			
Area	2020 Population	2023 Population	Percent Change - 2020 to 2023
Champaign County	38,714	38,845	0.3%
Crawford County	42,025	41,529	-1.2%
Erie County	75,622	74,035	-2.1%
Henry County	27,662	27,520	-0.5%
Huron County	58,565	58,199	-0.6%
Logan County	46,150	46,057	-0.2%
Sandusky County	58,896	58,709	-0.3%
Seneca County	55,069	54,527	-1.0%
<b>Assessment Area</b>	<b>402,703</b>	<b>399,421</b>	<b>-0.8%</b>
<b>Ohio</b>	<b>11,799,448</b>	<b>11,785,935</b>	<b>-0.1%</b>
Source: 2023 U.S. Census Bureau American Community Survey			
2020 U.S. Census Bureau American Community Survey			

- From 2020 through 2023 the AA saw a slight loss in population at -0.8%, compared to Ohio which saw a 0.8% decrease in population. Erie County experienced the largest loss in population at -2.1%, while Champaign was the only county to experience an increase in population at 0.3% during this period.
- Decreasing population could lead to increased economic pressure on the workforce.
- 77.9% of the AA population was 18 years of age or older, the legal age to enter into a contract.
- The majority of the AA population at 50.1% was between the ages of 25 and 64, which is the prime-working age.
- 18.9% of the population in the AA was age 65 and over, compared to 16.9% in Ohio.
- A higher elderly population may affect economic growth and the ability of government and communities to provide adequate resources for older adults, including but not limited to healthcare services.
- 16.2% of the AA's population reside in LMI tracts.
- According to Census data, Sandusky (Erie County) is the largest city in the AA with 24,241 in 2023, and its population decreased by 3.4% between 2020 and 2023. By contrast, Napoleon is the most populous city in Henry County, and its population decreased by 1.3% between 2020 and 2023.<sup>15</sup>

<sup>15</sup> [Ohio County Trends](#)

**Income Characteristics****Borrower Income Levels  
Nonmetropolitan Ohio**

FFIEC Estimated Median Family Income		% Change	Low	Moderate	Middle	Upper
			0 - 49.99%	50% - 79.99%	80% - 119.99%	120% - & above
2022	\$74,900		0 - \$37,449	\$37,450 - \$59,919	\$59,920 - \$89,879	\$89,880 - & above
2023	\$79,500	6.1%	0 - \$39,749	\$39,750 - \$63,599	\$63,600 - \$95,399	\$95,400 - & above

- During the evaluation period, the median family income (MFI) increased by 6.1%.
- From 2020 to 2022 MFI increased 11.1% and from 2020 to 2023 MFI increased 17.9%.
- According to 2020 Census data, AA MFI at \$67,419 is 9.4% less than Ohio MFI at \$74,391.
- Minimum wage for 2023 in Ohio is \$10.10 per hour or \$21,736 annually.<sup>16</sup> The Federal minimum wage is \$7.25 per hour and has remained stagnant since 2009.<sup>17</sup>

Poverty Rates			
Assessment Area: Nonmetropolitan Ohio			
Area	2020	2021	2022
Champaign County	10.1%	10.6%	9.8%
Crawford County	12.1%	13.5%	15.2%
Erie County	10.9%	12.6%	11.4%
Henry County	8.0%	8.9%	9.0%
Huron County	9.8%	11.2%	12.9%
Logan County	10.1%	10.1%	12.9%
Sandusky County	10.4%	13.1%	12.1%
Seneca County	10.4%	12.0%	12.0%
Ohio	13.6%	13.4%	13.4%
Source: Federal Reserve Economic Data   FRED   St. Louis Fed			

- During this period, poverty rates in the AA were mostly lower than poverty rates in Ohio, with the exception of Crawford County in 2021 and 2022.
- Of the 107,170 families in the AA, 36.0% are designated as LMI with 8.3% living below poverty; compared to 9.6% of families living below poverty across Ohio.
- Of the 162,961 households in the AA, 11.6% are below the poverty level and 3.0% receive public assistance; compared to 13.4% of households across Ohio that are below the poverty level.
- Supplemental Nutrition Assistance Program (SNAP)<sup>18</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

<sup>16</sup> [Ohio Minimum Wage](#)<sup>17</sup> [Federal Minimum Wage](#)<sup>18</sup> [Federal Reserve Economic Data \(FRED\)](#)



expenses. The table below shows the percentage of the population by county that received SNAP benefits in 2021.

SNAP Benefit Recipients Assessment Area: Nonmetropolitan Ohio	
Area	2021
Champaign County	9.7%
Crawford County	16.0%
Erie County	12.5%
Henry County	5.9%
Huron County	12.8%
Logan County	10.7%
Sandusky County	9.5%
Seneca County	11.9%
Source: Federal Reserve Economic Data   FRED   St. Louis Fed	

- Corresponding with poverty rates, Crawford County had the highest percentage and Henry County had the lowest percentage of recipients receiving SNAP benefits.

### Housing Characteristics

Housing Cost Change Assessment Area: Nonmetropolitan Ohio						
Area	Median Housing Value			Median Gross Rent		
	2020	2022	Percent Change	2020	2022	Percent Change
Champaign County	\$137,200	\$166,900	21.6%	\$737	\$856	16.1%
Crawford County	\$93,400	\$117,000	25.3%	\$646	\$746	15.5%
Erie County	\$146,800	\$169,400	15.4%	\$773	\$884	14.4%
Henry County	\$130,800	\$157,500	20.4%	\$738	\$846	14.6%
Huron County	\$131,600	\$151,600	15.2%	\$707	\$805	13.9%
Logan County	\$142,400	\$168,300	18.2%	\$717	\$802	11.9%
Sandusky County	\$118,600	\$142,300	20.0%	\$716	\$756	5.6%
Seneca County	\$108,900	\$128,100	17.6%	\$699	\$789	12.9%
Source: 2018-2022 U.S. Census Bureau: American Community Survey 2016-2020 U.S. Census Bureau: American Community Survey						

- Median housing values across the AA increased on average by 19.2% from 2020 to 2022.
- Overall, housing became less affordable across the AA most likely because MFI did not keep pace with home price growth. Crawford County had the lowest median housing value, but the highest percentage change and Erie County had the highest median housing value with the second lowest percentage change during this period.

- Based on 2020 Census data, the affordability ratio<sup>19</sup> was 44.2 in the AA compared to 38.4 in Ohio. Housing was generally more affordable across the AA than in other parts of Ohio. Crawford County had the highest affordability ratio at 49.7, while Erie County had the least affordable housing with an affordability ratio at 39.8.
- Median gross rents across the AA increased on average by 13.1% from 2020 to 2022, while MFI only increased by 11.1% during this time period. The rise in median gross rents indicates the need for more affordable housing. According to 2020 Census data, 35.7% of all renters in the AA had rental costs that were greater than 30.0% of their income.
- According to HUD's 2022 Fair Market Rents data,<sup>20</sup> the average rent for a one-bedroom unit was \$645 and \$808 for a two-bedroom unit in Erie County. Rents rose by 14.4% from 2020 to 2022, compared to a 11.1% increase in MFI from 2020 to 2022.
- According to the National Low Income Housing Coalition,<sup>21</sup> full-time workers must earn at least \$20.81 an hour (\$43,293 annual salary) in Ohio to afford a two-bedroom rental apartment, which is almost 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).
- There are 186,118 housing units in the AA, of which 63.4% are owner occupied, 24.2% are rental and 12.4% are vacant; consequently, there are more households who own their homes than there are renters. Only 7.0% of total housing units are in low-income tracts, and 38.6% of these housing units are owner-occupied and 61.4% are either rental or vacant. Only 16.8% of total housing units are in moderate-income tracts, 48.7% of these housing units are owner-occupied and 51.3% are either rental or vacant. With 36.6% of housing units across the AA being either rental or vacant, there may be limited opportunities to originate mortgage loans, particularly in low-income tracts.
- The median age of housing stock across the AA is 61 years old, and 34.2% of housing units were built prior to 1950. The age of the housing stock across the AA demonstrates a potential need for home improvement lending and refinance or home improvement loans to remove lead-based paint that was commonly used on houses and apartments built before 1978.<sup>22</sup>

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<sup>19</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>20</sup> [HUD's Fair Market Rents – Final FY2022](#)

<sup>21</sup> [National Low Income Housing Coalition-Ohio](#)

<sup>22</sup> [Ohio Department of Health/Know Our Programs/Childhood Lead Poisoning](#)

Housing Cost Burden						
Assessment Area: Nonmetropolitan Ohio						
Area	Cost Burden - Owners			Cost Burden - Renters		
	Low Income	Moderate Income	All Owners	Low Income	Moderate Income	All Renters
Champaign County	56.0%	24.5%	13.9%	56.5%	33.2%	27.4%
Crawford County	49.3%	21.0%	14.1%	66.7%	20.2%	37.1%
Erie County	55.6%	20.7%	13.5%	75.7%	17.6%	37.4%
Henry County	50.0%	21.7%	13.1%	67.9%	11.2%	25.9%
Huron County	62.4%	27.7%	14.8%	74.0%	16.6%	34.6%
Logan County	61.7%	26.1%	15.2%	62.9%	14.0%	29.7%
Sandusky County	59.2%	17.2%	12.8%	73.4%	13.5%	34.7%
Seneca County	49.0%	22.3%	12.8%	73.7%	20.3%	35.8%
<b>Assessment Area</b>	<b>55.6%</b>	<b>22.4%</b>	<b>13.8%</b>	<b>70.4%</b>	<b>18.2%</b>	<b>34.0%</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), 2016-2020 Comprehensive Housing Affordability Strategy</i>						

- 55.6% of low-income homeowners and 70.4% of low-income renters across the AA are cost burdened, compared to 22.4% of moderate-income homeowners and 18.2% of moderate-income renters.
- Based on 2020 Census data, 34.0% of renters across the AA are cost burdened, compared to 40.9% of renters across Ohio.
- The data shows cost burden disproportionately affects renter-occupied households, particularly low-income renters and low-income homeowners, respectively.
- Cost-burdened renters may have a difficult time saving enough monies to make a sufficient down payment to purchase a home or otherwise afford increasing rents.

### Labor, Employment, and Economic Characteristics

Unemployment Rates					
Assessment Area: Nonmetropolitan Ohio					
Area	2019	2020	2021	2022	2023
Champaign County	3.7%	7.2%	4.5%	3.7%	3.2%
Crawford County	4.7%	9.3%	5.9%	4.8%	4.3%
Erie County	5.0%	10.4%	6.4%	4.9%	4.4%
Henry County	4.7%	8.1%	5.2%	4.5%	4.2%
Huron County	5.8%	9.5%	5.9%	5.1%	4.5%
Logan County	3.7%	8.2%	4.2%	3.5%	3.0%
Sandusky County	4.3%	8.1%	5.3%	4.7%	3.5%
Seneca County	4.2%	8.1%	4.8%	4.2%	3.6%
<b>Assessment Area</b>	<b>4.6%</b>	<b>8.8%</b>	<b>5.4%</b>	<b>4.5%</b>	<b>3.9%</b>
<b>Ohio</b>	<b>4.2%</b>	<b>8.2%</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>					

- In response to the COVID-19 pandemic, unemployment rates increased substantially from 2019 to 2020. The average unemployment rate in the AA increased from 4.6% in 2019 to 8.8% in 2020. Subsequently, unemployment rates have rebounded to pre-pandemic levels. AA unemployment rates were comparable to unemployment rates in Ohio during this period. In 2023 Ohio had a historically low unemployment rate.
- According to the Bureau of Labor Statistics, the leading industries are manufacturing, government, retail trade, accommodation and food services, and health care and social assistance.

- As reported by the Ohio Office of Research:<sup>23</sup>
  - Major employers include but are not limited to Cedar Fair Entertainment Company, Firelands Regional Health System, the Sandusky School District, Erie County government, Providence Care Center, Avita Health System, Hord Family Farms, Ohio Mutual Insurance Group, ESCO Bucyrus and D. Pickling & Company, Whirlpool, Revere Plastics, Sandusky County government, Crown Battery, and Fremont Schools, Mercy Tiffin Hospital, and Ameriwood Industries.
  - The average private sector wage is \$939/week, which indicates employed persons can afford the average median rent of \$811 in the AA.
- Erie County is known as the Lake Erie Shores & Island region and is considered a popular tourist attraction. Erie County is home to Cedar Point Amusement Park, Cedar Point Sports Center and several other popular indoor waterpark resorts. According to Shores & Islands Ohio, the region set a record for travel and tourism in 2023, eclipsing over \$3.0 billion in total tourism sales and 13.0 million visitors. The travel and tourism industry are incredibly important to the economic vitality of the region. Approximately 14,000 people are employed within the travel and tourism industry in the region.<sup>24</sup>
- Cedar Point Sports Center partners with communities to plan, develop, and manage sports and recreational activities. In 2023 the facility drove \$22.6 million in economic impact, an increase from the \$19.0 million in economic impact from 2022. The center hosted over 3,600 teams and had over 100,000 visitors which drove around 15,000 hotel room nights. In 2024, the center is slated to host 46 tournaments, bringing \$25.0 million in economic impact to the local community.<sup>25</sup>
- Based on 2020 Census data and Broadband Ohio,<sup>26</sup> while approximately 86.3% of households in the AA have a broadband internet subscription, 76.4% of the populated area and 32.3% of households do not have access to the minimum bandwidth needed for basic internet activity. 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>23</sup> [Ohio County Trends](#)

<sup>24</sup> [Shores & Islands](#)

<sup>25</sup> [Community Playmaker](#)

<sup>26</sup> [Broadband Ohio](#)

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NONMETROPOLITAN OHIO

### **Lending Test**

Civista's performance under the lending test is good. Civista's lending activity demonstrates an adequate responsiveness to the credit needs of the community. Civista has a good distribution among borrowers of different income levels and an excellent distribution among businesses of different sizes. Civista has an excellent geographic distribution of loans with a moderate level of lending gaps. Civista makes adequate level of community development loans and makes use of flexible lending practices in this AA. Civista exhibits a good record of serving the credit needs of highly economically disadvantaged areas in its AA, low-income individuals, or businesses with gross annual revenue of \$1.0 million or less.

### ***Lending Activity***

Home purchase, refinance, home improvement, and small business loans were evaluated separately. Small farm, multi-family, and other purpose close-end loans were not considered in this evaluation due to limited volume.

Lending activity levels reflect an adequate responsiveness to the credit needs within the AA. The percentage of Civista's lending in Nonmetropolitan Ohio is 40.3%, compared to the percentage of total deposits is 62.8%.

HMDA (home purchase, refinance and home improvement, respectively) lending received the most weight based on total volume and dollar amount, followed by small business lending.

### ***Distribution to Borrowers of Different Incomes and 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.

Civista's overall distribution to HMDA lending among borrowers of different income (including LMI) levels is good and excellent among businesses of different sizes.

### ***HMDA Lending***

During the evaluation period, Civista originated 765 HMDA loans totaling \$106.8 million. Civista's performance was compared to the percentage of families (proxy) and aggregate lending data. Civista's borrower distribution of home purchase, refinance, and home improvement loans is good. See Appendix E for explicit HMDA-reportable lending data

### *Home Purchase Lending*

Civista originated 429 home purchase loans totaling \$70.3 million. Civista originated 30 (7.0%) home purchase loans totaling \$3.7 million (5.2%) to borrowers with unknown incomes, compared to aggregate lending performance at 18.9% by volume and 17.8% by dollar amount in 2022 and 16.3% by volume and 16.3% by dollar amount in 2023.

Civista originated 67 (15.6%) home purchase loans to low-income borrowers totaling \$6.9 million (9.8%), which was below the percentage of families at 17.0% by volume and dollar amount. In 2022, Civista's home purchase lending to low-income borrowers at 15.6% by volume and 10.5% by dollar amount significantly exceeded aggregate lending performance at 9.5% by volume and exceeded at 5.5% by dollar amount. In 2023, the bank's lending to low-income borrowers at 15.7% by volume and 9.0% by dollar amount significantly exceeded aggregate lending performance at 8.3% by volume and exceeded at 4.6% by dollar amount.

Civista originated 97 (22.6%) home purchase loans to moderate-income borrowers totaling \$10.9 million (15.5%), which exceeded the percentage of families at 18.9% by volume and was below by dollar amount. In 2022, Civista's home purchase lending to moderate-income borrowers at 24.2% by volume and 18.3% by dollar amount exceeded aggregate lending performance at 23.9% by volume and was comparable at 18.3% by dollar amount. In 2023, the bank's lending to moderate-income borrowers at 20.5% by volume and 12.4% by dollar amount was below aggregate lending performance at 26.0% by volume and 19.0% by dollar amount.

Borrower distribution of home purchase loans to low-income borrowers is good, considering performance fell slightly below proxy and significantly exceeded aggregate performance. Borrower distribution to moderate-income borrowers is good, considering performance exceeded proxy and fell slightly below aggregate performance.

### *Refinance Lending*

Civista originated 237 refinance loans totaling \$28.3 million. Civista originated 19 (8.0%) refinance loans totaling \$2.1 million (7.4%) to borrowers with unknown incomes, compared to aggregate lending performance at 8.4% by volume and 9.7% by dollar amount in 2022 and 8.8% by volume and 12.3% by dollar amount in 2023.

Civista originated 26 (11.0%) refinance loans to low-income borrowers totaling \$1.6 million (5.7%), which was below the percentage of families at 17.0% by volume and significantly below by dollar amount. In 2022, Civista's refinance lending to low-income borrowers at 9.2% by volume and 4.9% by dollar amount was slightly below aggregate lending performance at 10.6% by volume and 6.5% by dollar amount. In 2023, the bank's lending to low-income borrowers at 14.1% by volume and 7.4% by dollar amount exceeded aggregate lending performance at 11.2% by volume and was exceeded at 7.0% by dollar amount.

Civista originated 41 (17.3%) refinance loans to moderate-income borrowers totaling \$3.2 million (11.5%), which was slightly below the percentage of families at 18.9% by volume and below by dollar amount. In 2022, Civista's refinance lending to moderate-income borrowers at 18.4% by volume and 11.9% by dollar amount was slightly below aggregate lending performance at 24.3% by volume and below at 19.0% by dollar amount. In 2023, the bank's lending to moderate-income borrowers at 15.3% by volume and 10.7% by dollar amount was below aggregate lending performance at 22.9% by volume and 18.1% by dollar amount.

Borrower distribution of refinance loans to low-income borrowers is good, considering performance fell below proxy and exceeded aggregate performance. Borrower distribution to moderate-income borrowers is good, considering performance fell slightly below proxy and aggregate performance.

#### *Home Improvement Lending*

Civista originated 99 home improvement loans totaling \$8.2 million. Civista originated five (5.1%) home improvement loans totaling \$321,000 (3.9%) to borrowers with unknown incomes, compared to aggregate lending performance at 2.5% by volume and 2.8% by dollar amount in 2022 and 3.1% by volume and 2.3% by dollar amount in 2023.

Civista originated seven (7.1%) home improvement loans to low-income borrowers totaling \$163,000 (2.0%), which was significantly below the percentage of families at 17.0% by volume and dollar amount. In 2022, Civista's home improvement lending to low-income borrowers at 11.1% by volume and 1.7% by dollar amount slightly exceeded aggregate lending performance at 9.2% by volume and was significantly below at 6.2% by dollar amount. In 2023, the bank's lending to low-income borrowers at 6.7% by volume and 2.1% by dollar amount was slightly below the aggregate lending performance at 8.6% by volume and significantly below at 6.0% by dollar amount.

Civista originated 22 (22.2%) home improvement loans to moderate-income borrowers totaling \$712,000 (8.7%), which slightly exceeded the percentage of families at 18.9% by volume and was significantly below by dollar amount. In 2022, Civista's home improvement lending to moderate-income borrowers at 22.2% by volume and 2.3% by dollar amount was comparable to aggregate lending performance at 21.3% by volume and significantly below at 15.6% by dollar amount. In 2023, the bank's lending to moderate-income borrowers at 22.2% by volume and 10.6% by dollar amount was comparable to aggregate lending performance at 23.3% by volume and below at 16.7% by dollar amount.

Borrower distribution of home improvement loans to low-income borrowers is good, considering performance fell below proxy and was comparable to aggregate performance. Borrower distribution is excellent to moderate-income borrowers, considering performance exceeded proxy and was comparable to aggregate performance.

### *Small Business Lending*

Civista originated 202 small business loans to businesses of different sizes totaling \$24.4 million, and one loan totaling \$20,000 was extended to a business with an unknown gross annual revenue. Civista's performance was compared to the percentage of small businesses (proxy) and aggregate lending data.

Civista originated 201 (99.5%) by volume totaling \$24.4 million (99.9%) by dollar amount to businesses with revenue of \$1.0 million or less, which exceeded the percentage of small businesses at 89.8%. In 2022, Civista's lending to small businesses at 99.0% by volume and 99.9% by dollar amount exceeded aggregate lending performance at 56.1% by volume and 37.2% by dollar amount. In addition, 87.6% of Civista's small business 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.

Considering lending exceeded demographic and aggregate comparators and Civista's willingness to lend in smaller amounts, this exhibits an excellent responsiveness to the credit needs of small business in the AA. Small dollar loans tend to represent amounts typically requested by small businesses. Therefore, the distribution of small business loans to businesses of different sizes is excellent.

### *Geographic Distribution of Loans*

Civista's overall geographic distribution of lending is excellent. HMDA lending is excellent and small business lending is good. Civista had a moderate level of lending gaps.

Lending Penetration								
Tract Income	Nonmetropolitan Ohio - 2022				Nonmetropolitan Ohio - 2023			
	# Tracts	Tracts w/ no loans	Tracts w/ Loans	Penetration	# Tracts	Tracts w/ no loans	Tracts w/ Loans	Penetration
Low	1	0	1	100.0%	1	0	1	100.0%
Moderate	18	6	12	66.7%	18	7	11	61.1%
Middle	63	17	46	73.0%	63	18	45	71.4%
Upper	20	5	15	75.0%	20	5	15	75.0%
Unknown	1	1	0	0.0%	1	1	0	0.0%
Total	103	29	74	71.8%	103	31	72	69.9%

Civista was able to penetrate approximately 71.0% of total tracts during the evaluation period. There were no lending gaps in the low-income tract, which had less than 1.0% of total housing units and 61.4% of units being either rental or vacant. Lending gaps were significant in moderate-income tracts with a penetration rate of approximately 64.0%. Civista has four branches in moderate-income tracts in Henry, Huron, and Logan counties. With less than 17.0% of total



housing units in moderate-income tracts and 51.3% being either rental or vacant units; lending opportunities in these tracts are likely to be limited.

### *HMDA Lending*

During the evaluation period, Civista originated 765 HMDA-reportable loans totaling \$106.8 million. Civista's performance was compared to the percentage of owner-occupied units (proxy) and aggregate lending data. Civista's geographic distribution of home purchase and refinance loans is excellent and good for home improvement loans. See Appendix E for explicit HMDA-reportable lending data.

### *Home Purchase Lending*

Civista originated 23 (5.4%) home purchase loans in the low-income tract totaling \$2.6 million (3.7%), which significantly exceeded the percentage of owner-occupied units at 0.5% by volume and dollar amount. In 2022, Civista's home purchase lending in the low-income tract at 4.5% by volume and 3.6% by dollar amount significantly exceeded aggregate lending performance at 0.6% by volume and 0.4% by dollar amount. In 2023, the bank's lending in the low-income tract at 6.5% by volume and 3.9% by dollar amount significantly exceeded aggregate lending performance at 0.7% by volume and 0.4% by dollar amount.

Civista originated 85 (19.8%) home purchase loans in moderate-income tracts totaling \$10.7 million (15.2%), which exceeded the percentage of owner-occupied units at 12.9% by volume and dollar amount. In 2022, Civista's home purchase lending in moderate-income tracts at 19.3% by volume and 15.2% by dollar amount exceeded aggregate lending performance at 15.5% by volume and 11.3% by dollar amount. In 2023, the bank's lending in moderate-income tracts at 20.5% by volume and 15.2% by dollar amount exceeded aggregate lending performance at 16.1% by volume and 12.0% by dollar amount.

Geographic distribution of home purchase loans in LMI tracts is excellent, considering performance significantly exceeded proxy and aggregate performance.

### *Refinance Lending*

Civista originated seven (3.0%) refinance loans in the low-income tract totaling \$586,000 (2.1%), which significantly exceeded the percentage of owner-occupied units at 0.5% by volume and dollar amount. In 2022, Civista's refinance lending in the low-income tract at 2.6% by volume and 1.2% by dollar amount significantly exceeded aggregate lending performance at 0.6% by volume and 0.6% by dollar amount. In 2023, the bank's lending in the low-income tract at 3.5% by volume and 3.7% by dollar amount significantly exceeded aggregate lending performance at 0.4% by volume and 0.8% by dollar amount.

Civista originated 34 (14.3%) refinance loans in moderate-income tracts totaling \$2.9 million (10.3%), which slightly exceeded the percentage of owner-occupied units at 12.9% by volume and was slightly below by dollar amount. In 2022, Civista's refinance lending in moderate-income tracts at 14.5% by volume and 10.9% by dollar amount slightly exceeded aggregate lending performance at 11.8% by volume and 8.7% by dollar amount. In 2023, the bank's lending in moderate-income tracts at 14.1% by volume and 9.3% by dollar amount exceeded aggregate lending performance at 10.6% by volume and slightly exceeded at 8.3% by dollar amount.

Geographic distribution of refinance loans in the low-income tract is excellent, considering performance significantly exceeded proxy and aggregate lending performance. Geographic distribution is excellent in moderate-income tracts, considering performance exceeded proxy and aggregate performance.

#### *Home Improvement Lending*

Civista originated two (2.0%) home improvement loans in the low-income tract totaling \$76,000 (0.9%), which significantly exceeded the percentage of owner-occupied units at 0.5% by volume and dollar amount. In 2022, the bank did not originate home improvement loans in the low-income tract, compared to the aggregate lending performance at 0.1% by volume and dollar amount. In 2023, the bank's lending in the low-income tract at 2.2% by volume and 1.2% by dollar amount significantly exceeded aggregate lending performance at 0.4% by volume and at 0.5% by dollar amount.

Civista originated 10 (10.1%) home improvement loans in moderate-income tracts totaling \$294,000 (3.6%), which was slightly below the percentage of owner-occupied units at 12.9% by volume and significantly below by dollar amount. In 2022, Civista's home improvement lending in moderate-income tracts at 11.1% by volume and 1.4% by dollar amount exceeded aggregate lending performance at 11.0% by volume and was significantly below at 8.2% by dollar amount. In 2023, the bank's lending in moderate-income tracts at 10.0% by volume and 4.2% by dollar amount was comparable to aggregate lending performance at 10.5% by volume and was below at 6.7% by dollar amount.

Geographic distribution of home improvement loans in the low-income tract is excellent, considering performance significantly exceeded comparators and the limited number of housing units in this tract. Geographic distribution in moderate-income tracts is good, considering performance fell slightly below proxy and was comparable to aggregate performance.

#### *Small Business Lending*

During the evaluation period Civista originated 202 small business loans to business of different sizes totaling \$24.4 million. Civista's performance was compared to the percentage of total businesses by tract (proxy) and aggregate lending data for 2022. The geographic distribution of small business loans is good.

Civista originated 10 (5.0%) small business loans in the low-income tract totaling \$2.6 million (10.8%), which significantly exceeded the percentage of businesses in the tract at 0.9% by volume and dollar amount. In 2022, Civista's small business lending in the low-income tract at 5.8% by volume and 12.6% by dollar amount significantly exceeded aggregate lending performance at 0.7% by volume and 1.6% by dollar amount.

Civista originated 29 (14.4%) small business loans in moderate-income tracts totaling \$3.4 million (14.0%), which was slightly below the percentage of businesses in these tracts at 16.7% by volume and dollar amount. In 2022, Civista's small business lending in moderate-income tracts at 15.4% by volume and 14.3% by dollar amount exceeded aggregate lending performance at 15.1% by volume and was below at 19.7% by dollar amount.

Geographic distribution of small business loans in the low-income tract is excellent, considering performance significantly exceeded comparators and the limited number of businesses in this tract. Geographic distribution in moderate-incomes is good, considering performance fell slightly below proxy and was comparable to aggregate performance.

### *Community Development Loans*

Civista originated five community development loans totaling \$3.7 million that supported affordable housing. These loans funded non-subsidized rental housing in LMI and middle- and upper-income tracts. These funds helped small landlords to either purchase or renovate three multi-family dwellings with the majority of units (161 units) having documented affordable rents.

These loans represent 4.8% of community development loans by dollar amount, compared to 40.3% total lending in the AA and ranks as Civista's fourth-highest percentage of community development lending during the evaluation period. Community contacts stressed the critical need for all aspects of affordable housing, and these loans are responsive to these expressed needs. However, Civista has the capacity and market presence (ranked first among 38 financial institutions with 17.6% of the deposit market share) to be more responsive to community development opportunities, including the ability to make loans that address multiple community development needs. In addition to affordable housing, community contacts expressed the need for childcare services, financial literacy, workforce development, and economic development. Civista makes an adequate level of community development loans in Nonmetropolitan Ohio and exhibits a good record of serving the credit needs of LMI individuals.

### *Flexible Lending Programs*

Civista originated 72 loans totaling \$8.8 million in Nonmetropolitan Ohio. Civista originated 59 Community View loans totaling \$7.1 million and 15 FHA/fixed rate loans totaling \$1.6 million. Civista also dispersed 24 Welcome Home grants totaling \$327,500 to LMI homebuyers. The

following tables show the percentage by volume and dollar amount in these flexible lending programs (with at least 25 loans) and the distribution of lending by tract income.

Geographic Distribution of Community View Loans					
Tract Income Level	#	# - %	\$	\$ - %	Percentage of Owner-Occupied Units (2023)
Low	8	13.6%	\$931,050	13.1%	0.4%
Moderate	18	30.5%	\$2,279,656	32.0%	12.9%
Middle	30	50.8%	\$3,407,475	47.9%	60.2%
Upper	3	5.1%	\$501,000	7.0%	26.5%
<b>Total</b>	<b>59</b>	<b>100.0%</b>	<b>\$7,119,181</b>	<b>100.0%</b>	<b>100.0%</b>

Civista originated eight Community View loans (\$739,000) to homebuyers in the low-income tract, which significantly exceeded proxy by volume and dollar amount. Civista originated 17 Community View loans (\$2.1 million) to homebuyers in moderate-income tracts, which significantly exceeded proxy by volume and dollar amount.

Geographic Distribution of Welcome Home Grants*					
Tract Income Level	#	# - %	\$	\$ - %	Percentage of Owner-Occupied Units (2023)
Low	0	0.0%	\$0	0.0%	0.4%
Moderate	5	20.8%	\$55,000	16.8%	12.9%
Middle	15	62.5%	\$207,500	63.4%	60.2%
Upper	4	16.7%	\$65,000	19.8%	26.5%
<b>Total</b>	<b>24</b>	<b>100.0%</b>	<b>\$327,500</b>	<b>100.0%</b>	<b>100.0%</b>
<i>*All Welcome Home grants benefit LMI borrowers (regardless of tract income.)</i>					

Civista dispersed five Welcome Home grants (\$53,678) to LMI homebuyers in moderate-income tracts, which exceeded proxy by volume and dollar amount. No grants were dispersed in the low-income tract.

Through these programs Civista was able to assist borrowers purchase homes in LMI geographies and/or help LMI borrowers obtain essential down-payment assistance and first-time homebuyer education in some circumstances.

Civista makes use of flexible lending practices in serving AA credit needs, and the qualitative impact of these products on LMI individuals and LMI areas enhanced Civista's overall lending test performance.

**Investment Test**

Civista has a significant level of qualified investments, donations, and grants in Nonmetropolitan Ohio.

<b>Purpose of Qualified Investment</b>	<b>#</b>	<b>\$</b>
Affordable Housing	5	\$2,817,010
Economic Development	1	\$2,250,000
Services to LMI	1	\$355,000
<b>Total</b>	<b>7</b>	<b>\$5,422,010</b>

Civista holds the following seven prior period investments with a current book value of approximately \$5.4 million:

**Affordable Housing**

- Two municipal bonds with a book value of \$2.6 million that provided capital funding to a local port authority that provides homeownership opportunities and family self-sufficiency programs in Erie County.
- Three mortgage-backed securities with a book value of approximately \$178,884 that support affordable housing across the AA.

**Economic Development**

- A revenue bond with a book value of approximately \$2.3 million that provides funding for a \$28.0 million arena, which is an expansion of Cedar Fair's Cedar Point Sports Center project. This project supports Sandusky's community revitalization plan to focus on promoting sustainable tourism.

**Services to LMI**

- A municipal school bond with a book value of approximately \$355,000 that supports a school with majority of students eligible for free- and reduced-lunch program.

Qualified investments also took the form of small dollar donations and grants. Civista made 14 donations totaling \$17,625 that supported organizations and nonprofits that provide wraparound services to LMI individuals and families.

Examples of impactful donations include:

- \$2,500 donation to a local foundation providing healthcare and educational services at a school serving LMI children.
- \$2,500 donation to a nonprofit serving the low-income area providing mentorship and basic human services to LMI individuals.
- \$2,500 donation to a foundation providing healthcare and other wraparound services in a medically underserved area.

Civista also processed and disbursed 24 Welcome Home grants totaling \$327,000 in Nonmetropolitan Ohio. These grants assist LMI homebuyers with down payments and closing costs when purchasing their primary residence.

Qualified investments and contributions total \$5.8 million and represent 26.8% of community development investments by dollar amount, compared to total percentage of deposits at 62.8% and total percentage of branches at 51.2%. This ranks as Civista's highest percentage of qualified investments and contributions during the evaluation period. While Civista did not obtain new investments during this evaluation period, community contacts stressed the critical need for all aspects of affordable housing, and these prior period investments continue to be responsive to these expressed needs. Qualified investments and small dollar contributions address multiple community development needs. In addition to affordable housing, qualified investments and donations support wraparound services to LMI individuals and families and economic development initiatives. While not necessarily complex, qualified investments and contributions exhibit good responsiveness to credit and community development needs.

### **Service Test**

Retail services are reasonably accessible and Civista provides a relatively high level of community development services.

#### ***Retail Services***

As a result of Comunibanc acquisition in July 2022, Civista acquired six branches in Henry County. Two of these branches with full-service ATMs are in Napoleon in moderate-income tracts. There is also another branch in Napoleon without an ATM in an upper-income tract. The remaining three acquired branches without ATMs are in Liberty Center and Malinta in middle-income tracts and Holgate in an upper-income tract.

Civista's record of opening and closing offices has improved the accessibility of its delivery systems, particularly in moderate-income geographies. Civista's delivery services are reasonably accessible to portions of Civista's geographies and individuals of different income levels.

Business hours and services provided do not vary in a way that inconveniences certain portions of the AA, including moderate-income geographies and to LMI households, and are consistent with the services and hours discussed in the "Institution" assessment. All branches in this AA offer drive-thru services and weekend hours of service. Six branches offer extended hours of service, including one in a moderate-income tract.

Civista currently maintains its main office with a full-service ATM, along with 16 branches with ATMs, and four branches without ATMs in this AA. In moderate-income tracts, Civista has two branches with full-service ATMs in Norwalk (Huron County) and Napoleon (Henry County), as well as a branch with a cash-only ATM in Russells Point (Logan County), and a branch without

an ATM in Napoleon. In middle-income tracts, Civista has seven branches with full-service ATMs in Urbana (Champaign County); Castalia (Erie County); Greenwich, Norwalk, Plymouth, and Willard (Huron County); and New Washington (Crawford County). Civista also has two branches without ATMs in Liberty Center and Malinta (Henry County). In upper-income tracts, Civista has four branches with full-service ATMs in West Liberty (Logan County) and in Berlin Heights, West Liberty, and two in Sandusky (Erie County), as well as a branch with a cash-only ATM in Huron (Erie County). Civista also has two branches without ATMs in Holgate and Napoleon (Henry County). Branch offices in this AA represent 51.2% of Civista's total branches. Lastly, Civista has two stand-alone cash-only ATMs in Sandusky (Erie County) in a middle-income tract and upper-income tract.

The following table illustrates the percentage of branch offices and ATMs in low-, moderate-, middle-, and upper-income census tracts in comparison to the number and percentage of census tracts and the percentage of households and businesses in those tracts.

Geographic Distribution of Branches & ATMS																							
Assessment Area: Nonmetropolitan Ohio																							
Tract Category	Branches							ATMs										Demographics					
	Total Branches				Drive-thrus	Extended Hours	Weekend Hours	Total ATMs			Full Service ATMs				Cash only ATMs				Census Tracts		Households	Total Businesses	
			Open	Closed									Open	Closed			Open	Closed					
	#	%	#	#	#	#	#	#	%	#	%	#	%	#	%	#	%	#	%	%	%		
Low	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	1	1.0%	0.7%	0.9%	
DTO	0		0	0	0			SA	0		0		0	0	0		0	0					
Moderate	4	19.0%	2	0	4	1	4	Total	4	21.1%	3	20.0%	2	0	1	25.0%	0	0	18	17.5%	16.7%	16.7%	
DTO	0		0	0	0			SA	0		0		0	0	0		0	0					
Middle	10	47.6%	2	0	10	5	10	Total	9	47.4%	8	53.3%	0	0	1	25.0%	0	0	63	61.2%	59.4%	58.3%	
DTO	0		0	0	0			SA	1		0		0	0	1		0	0					
Upper	7	33.3%	2	0	7	0	7	Total	6	31.6%	4	26.7%	0	0	2	50.0%	0	0	20	19.4%	23.2%	24.1%	
DTO	0		0	0	0			SA	1		0		0	0	1		0	0					
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	1	1.0%	0.0%	0.0%	
DTO	0		0	0	0			SA	0		0		0	0	0		0	0					
Total	21	100%	6	0	21	6	21	Total	19	100%	15	100%	2	0	4	100%	0	0	103	100%	100%	100%	
DTO	0		0	0	0			SA	2		0		0	0	2		0	0					

Based on 2023 FFIEC Census Data  
Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.  
DIO - Drive thru only is a subset of total branches  
SA = Stand Alone ATM is a subset of total ATMs

Branch distribution in moderate-income tracts is considered excellent. The distribution of branches at 19.0% and full-service ATMs at 20.0% exceeded the percentage of moderate-income census tracts (17.5%), households (16.7%), and total businesses 16.7%) in these tracts. While Civista does not have a branch in the low-income tract, there are a very limited number households and businesses in this tract; regardless, Civista was able to originate loans in this tract during the evaluation period.

### Community Development Services

During the evaluation period, 35 employees assisted 23 organizations totaling 402 hours of community development service to local organizations that provide a multitude of services throughout the AA. This represents 45.8% of total service hours, compared to the total percentage of branches at 51.2%. The hours of service provided in this AA equates to 0.2 ANP. This ranks as Civista's highest percentage of community development services during the evaluation period.

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

Purpose of CD Service	# Services	# Organizations	# Employees*	# Hours
Services to LMI	174	17	31	378
Economic Development	13	5	3	14
Affordable Housing	6	1	1	10
<b>Total</b>	<b>193</b>	<b>23</b>	<b>35</b>	<b>402</b>

*\*Some employees may be double-counted if performed more than one service*

Employees provided financial expertise through leadership positions in multiple community organizations that provide services to LMI individuals and families and promotes economic development and affordable housing. Community development services include 205 hours serving on boards and committees, 174 hours of financial literacy, and 23 hours providing technical expertise.

Examples of impactful community development services include:

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

- An employee serves on the finance committee of community hospital oversees allocation of dollars for the hospital's affordable housing project which addressed the link between housing stability and health outcomes.
- Three employees serve on boards and/or finance committees of five organizations that promote economic development, workforce development initiatives, and community development revitalization.
- An employee serves as a board member of a nonprofit that supports mentorship for LMI youth.
- An employee serves as board member of a nonprofit foundation that works to preserve and advance healthcare services in a region that is medically underserved. Residents, particularly in Erie County, face challenges accessing quality healthcare.
- An employee serves as a board member of an organization which seeks to drive economic growth through regional (multi-county) workforce strategies.

#### **Technical Expertise**

- Six employees provided technical expertise to three organizations related to fundraising, budget and allocation planning, resource distribution, and installing computer software for a nonprofit food kitchen.

#### **Financial Literacy**

- 14 employees participated in a local food bank's financial literacy program. In addition to providing food assistance, this food bank also helps LMI individuals struggling with food insecurity develop the skills needed to manage their finances and connects them to other resources.



Civista provides a relatively high level of community development services in Nonmetropolitan Ohio. Community contacts stressed the critical need for all aspects of affordable housing, along with wraparound services to LMI individuals and families and economic development initiatives. Community development services are responsive to these expressed needs.

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE  
TOLEDO OH MSA #45780**

Civista's delineated footprint in the Toledo MSA (Toledo AA) includes the entireties of Ottawa and Wood counties (excluding Fulton and Lucas counties). Since the previous evaluation, Civista added Wood County after the acquisition of Comunibanc in 2022. The Census Bureau released new size and population data from the 2020 Census on August 12, 2021. Due to these changes, this AA was comprised of the following tracts for this analysis.

<b>Income Tract Designations</b>	
<b>Assessment Area: Toledo, OH MSA</b>	
<b>Tract Income Level</b>	<b>2022-2023</b>
	<b>Number of Tracts</b>
Low	1
Moderate	4
Middle	21
Upper	18
Unknown	2
<b>Total</b>	<b>46</b>

Based on changes to the AA and 2020 Census data, the AA gained one low-, four moderate-, 12 middle-, 14 upper-, and two unknown-income tract(s) since the previous evaluation.

As of June 30, 2023, the FDIC summary of deposits report ranked Civista 19<sup>th</sup> among 21 financial institutions in the AA with 0.6% of the deposit market share, compared to first ranked The Huntington National Bank with 30.7% and second ranked Fifth Third Bank, National Association with 12.7% of the deposit market share. By comparison, Civista ranked 23<sup>rd</sup> among 23 financial institutions in the MSA with 0.1% of the deposit market share, compared to first ranked The Huntington National Bank with 23.1% and second ranked Fifth Third Bank, National Association with 19.6% of the deposit market share. Deposits in this AA accounted for 0.8% of Civista's total deposits.

The 2023 HMDA peer market data shows that Civista ranked 20<sup>th</sup> among 247 reporters in the MSA having originated 37 loans. The top two HMDA lenders in this market, The Huntington National Bank, originated 757 loans and Rocket Mortgage, LLC originated 196 loans. Civista ranked 14<sup>th</sup> among HMDA lenders in this market in 2022 and originated 70 loans. Civista's HMDA-reportable lending decreased by 47.1% from 2022 to 2023.

Civista ranked 19<sup>th</sup> among 74 CRA reporters serving the MSA in 2023 having originated 12 loans. The top four CRA reporters in this market are American Express National Bank originating 551 loans, JP Morgan Chase Bank National Association originating 413 loans, Synchrony Bank originating 212 loans, and Capital One National Association originating 198 loans. Civista ranked

22<sup>nd</sup> among CRA reporters in this market in 2022 and originated 12 loans. Civista's CRA-reportable (small business) lending remained stable from 2022 to 2023.

### Community Contacts

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 interview was conducted with a consortium of community stakeholders as part of a CRA listening session conducted in Toledo in February 2024. Community stakeholders identified critical needs for more access to affordable housing, homelessness prevention, reliable public transportation, and affordable small dollar loans for LMI individuals and small businesses. Community stakeholders indicated public transportation does not adequately serve LMI individuals to help them get to work or easily access essential social services. The stakeholders indicated homeless rates have dramatically increased as rental rates have increased and several emergency rental assistance program(s) are ending. Stakeholders believe these circumstances have put housing out of reach for more people than ever before and that more individuals and families are at increased risk of becoming homeless for the first time. Stakeholders indicated there is a need to reduce neighborhood blight and build more affordable housing. They also said Toledo needs large-scale redevelopment projects to help spur economic growth and job creation. Community stakeholders agreed local financial institutions could do a better job making small dollar loans available to LMI individuals to rehabilitate dilapidated housing and/or pay for emergency expenses and for small business owners to grow their businesses.

### Population Characteristics

<b>Population Change</b>			
<b>Assessment Area: Toledo, OH MSA #45780</b>			
<b>Area</b>	<b>2020 Population</b>	<b>2023 Population</b>	<b>Percent Change - 2020 to 2023</b>
Ottawa County	40,364	39,803	-1.4%
Wood County	132,248	132,650	0.3%
Toledo, OH MSA	606,240	600,141	-1.0%
Ohio	11,799,448	11,785,935	-0.1%
Source 2023 U.S. Census Bureau American Community Survey 2020 U.S. Census Bureau Decennial Census			

- From 2020 through 2023 the AA experienced a slight decrease in population at 0.1%, comparable with Ohio. During this time, Ottawa County saw a decrease in population, while Wood County saw a slight increase.
- 80.3% of the AA population was 18 years of age or older, the legal age to enter into a contract.

- The majority of the AA population (47.3%) was between the ages of 25 and 64, which is the prime-working age.
- 17.5% of the population in the AA was age 65 and over, compared to 16.9% in Ohio.
- A higher elderly population may affect economic growth and the ability of government and communities to provide adequate resources for older adults, including but not limited to healthcare services.
- 10.2% of the AA's population reside in LMI tracts.
- According to Census data, Bowling Green (Wood County) is the most populous city in the AA with 30,384 residents, and its population decreased by 1.3% between 2020 and 2023. By contrast, Port Clinton is the most populous city in Ottawa County with 5,933 residents, and its population decreased by 1.6% between 2020 and 2023.<sup>27</sup>

### Income Characteristics

**Borrower Income Levels**  
**Toledo, OH MSA**

FFIEC Estimated Median Family Income	% Change	Low		Moderate		Middle		Upper	
		0	- 49.99%	50%	- 79.99%	80%	- 119.99%	120%	- & above
<b>2022</b>	<b>\$78,800</b>	0	- \$39,399	\$39,400	- \$63,039	\$63,040	- \$94,559	\$94,560	- & above
<b>2023</b>	<b>\$88,700</b>	12.6%	0 - \$44,349	\$44,350	- \$70,959	\$70,960	- \$106,439	\$106,440	- & above

- During the evaluation period, MFI increased by 12.6%.
- From 2020 to 2022 MFI decreased 3.3% and from 2020 to 2023 MFI increased 8.8%.
- According to 2020 Census data, AA MFI at \$81,501 is 9.6% higher than Ohio MFI at \$74,391.
- Minimum wage for 2023 in Ohio is \$10.45 per hour or \$21,736 annually.<sup>28</sup> The Federal minimum wage is \$7.25 per hour and has remained stagnant since 2009.<sup>29</sup>

<b>Poverty Rates</b>			
<b>Assessment Area: Toledo, OH MSA #45780</b>			
<b>Area</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Ottawa County	7.7%	8.4%	9.9%
Wood County	9.9%	10.9%	12.1%
<b>Ohio</b>	<b>13.6%</b>	<b>13.4%</b>	<b>13.4%</b>
<i>Source: Federal Reserve Economic Data   FRED   St. Louis Fed</i>			

<sup>27</sup>[Ohio County Trends](#)

<sup>28</sup> [Minimum Wage - OH](#)

<sup>29</sup> [Federal Minimum Wage](#)

- During this period, poverty rates across the AA were consistently lower than poverty rates in Ohio.
- Of the 42,034 families in the AA, 31.0% are designated as LMI with 6.3% living below poverty; compared to 9.6% living below poverty across Ohio.
- Of the 68,885 households in the AA, 12.0% are below the poverty level and 1.3% receive public assistance; compared to 13.4% of households across Ohio that are below the poverty level.
- SNAP<sup>30</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. The table below shows the percentage of the population by county that received SNAP benefits in 2021.

SNAP Benefit Recipients	
Assessment Area: Toledo, OH MSA #45780	
Area	2021
Ottawa County	8.4%
Wood County	5.1%
Source: Federal Reserve Economic Data   FRED   St. Louis Fed	

- While Ottawa County had the highest percentage of population receiving SNAP benefits, Wood County had the highest poverty rates. This may indicate that individuals eligible for SNAP benefits did not enroll due to lack of awareness about eligibility, difficulties navigating the application process, and/or stigma associated with receiving assistance.

### Housing Characteristics

Housing Cost Change						
Assessment Area: Toledo, OH MSA #45780						
Area	Median Housing Value			Median Gross Rent		
	2020	2022	Percent Change	2020	2022	Percent Change
Ottawa County	\$138,800	\$179,100	29.0%	\$696	\$846	21.6%
Wood County	\$160,058	\$165,400	3.3%	\$811	\$907	11.8%
Source: 2018-2022 U.S. Census Bureau: American Community Survey 2016-2020 U.S. Census Bureau: American Community Survey						

- Median housing values increased by 29.0% in Ottawa County and 3.3% in Wood County from 2020 to 2022.
- Overall, housing became less affordable across the AA most likely because MFI did not keep pace with home growth price.

<sup>30</sup> [Federal Reserve Economic Data \(FRED\)](#)

- Based on 2020 Census data, the affordability ratio<sup>31</sup> was 38.2 in the AA compared to 38.4 in Ohio. Housing was generally comparable across the AA to other parts of Ohio.
- Median gross rents across the AA increased on average by 16.7% from 2020 to 2022, while MFI decreased by 3.3% during this time period. The rise in median gross rents indicates the need for more affordable housing. According to 2020 Census data, 37.5% of all renters in the AA had rental costs that were greater than 30.0% of their income.
- According to HUD's 2022 Fair Market Rents data,<sup>32</sup> the average rent for a two-bedroom unit in Ottawa County is \$785, and \$806 in Wood County. Rents rose by 21.6% and 11.8% from 2020 to 2022 compared to a 3.3% decrease in MFI from 2020 to 2022.
- According to the National Low Income Housing Coalition,<sup>33</sup> full-time workers must earn at least \$20.81 an hour (\$43,293 annual salary) in Ohio to afford a two-bedroom rental apartment, which is almost 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).
- There are 82,634 housing units in the AA, of which 57.4% are owner occupied, 25.9% are rental and 16.7% are vacant; consequently, there are more households who own their homes than there are renters. Only 3.0% of total housing units are in the low-income tract and 4.2% of the housing units are owner-occupied and 95.8% are either rental or vacant. Only 8.3% of total housing units are in moderate-income tracts and 39.4% of the housing units are owner-occupied and 60.6% are either rental or vacant. With 42.7% of housing units across the AA being either rental or vacant, there may be limited opportunities to originate mortgage loans, particularly in the low-income tract.
- The median age of housing stock across the AA is 50 years old, and 22.7% of housing units were built prior to 1950. The age of the housing stock across the AA demonstrates a potential need for refinance or home improvement loans to remove lead-based paint that was commonly used on houses and apartments built before 1978.<sup>34</sup>

Housing Cost Burden						
Assessment Area: Toledo, OH MSA #45780						
Area	Cost Burden - Owners			Cost Burden - Renters		
	Low Income	Moderate Income	All Owners	Low Income	Moderate Income	All Renters
Ottawa County	47.2%	23.6%	14.1%	63.6%	13.3%	33.6%
Wood County	61.9%	25.1%	14.5%	75.2%	26.4%	35.1%
Assessment Area	56.4%	24.6%	14.4%	72.7%	23.3%	34.8%
Toledo, OH MSA	59.3%	28.6%	16.6%	70.7%	29.0%	39.1%
Cost Burden is housing cost that equals 30 percent or more of household income						
Source: U.S. Department of Housing and Urban Development (HUD), 2016-2020 Comprehensive Housing Affordability Strategy						

<sup>31</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>32</sup> [HUD's Fair Market Rents – Final FY2022](#)

<sup>33</sup> [National Low Income Housing Coalition-Ohio](#)

<sup>34</sup> [Ohio Department of Health/Know Our Programs/Childhood Lead Poisoning](#)

- 56.4% of low-income homeowners and 72.7% of low-income renters are cost burdened, compared to 24.6% of moderate-income homeowners and 23.3% of moderate-income renters.
- 14.4% of all homeowners and 34.8% of all renters across the AA are cost burdened, compared to 16.4% of all homeowners and 38.9% of renters across Ohio.
- The data shows cost burden disproportionately affects renter-occupied households, particularly low-income renters and low-income homeowners, respectively.
- Cost-burdened renters may have a difficult time saving enough monies to make a sufficient down payment to purchase a home or otherwise afford increasing rents.

### **Labor, Employment, and Economic Characteristics**

<b>Unemployment Rates</b>					
<b>Assessment Area: Toledo, OH MSA #45780</b>					
<b>Area</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>
Ottawa County	5.7%	9.1%	6.1%	5.2%	4.8%
Wood County	3.7%	7.0%	4.3%	3.5%	3.2%
<b>Assessment Area</b>	<b>4.1%</b>	<b>7.5%</b>	<b>4.7%</b>	<b>3.9%</b>	<b>3.6%</b>
<b>Toledo, OH MSA</b>	<b>4.5%</b>	<b>9.4%</b>	<b>5.7%</b>	<b>4.2%</b>	<b>4.0%</b>
<b>Ohio</b>	<b>4.2%</b>	<b>8.2%</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>					

- In response to the COVID-19 pandemic, unemployment rates increased substantially from 2019 to 2020. The average unemployment rate in the AA increased from 4.1% in 2019 to 7.5% in 2020. Subsequently, unemployment rates have rebounded to pre-pandemic levels. AA unemployment rates were comparable to unemployment rates in Ohio during this period. In 2023 Ohio had a historically low unemployment rate.
- As reported by the Ohio Office of Research:<sup>35</sup>
  - The leading industries in the AA are private sector industries, manufacturing, government, and transportation and warehousing.
  - Major employers in the AA include but are not limited to Bowling Green State University (BGSU), First Solar, Incorporated, Material Handling Services, Continental Structural Plastics, Incorporated, FedEx Ground Package System, Incorporated, Norplus Industries and Amazon. ProMedican Health Systems, Whirlpool Corporation and FCA US LLA are some larger regional employers in Northwest Ohio.
- Nearly 1,000 manufacturing facilities are located in the Greater Toledo area. These facilities largely include automotive assembly, but also include parts production, glass, plastic, and metal parts.<sup>36</sup>
- BGSU and the University of Toledo have partnered to establish the \$31.3 million Northwest Ohio Glass Innovation Hub to ensure Ohio remains a global leader in glass

<sup>35</sup> [Ohio County Trends](#)

<sup>36</sup> [Toledo Economy](#)

technology and production. Both universities will conduct high-impact research, support public-private partnerships and workforce development in the growing glass industry. The Glass Innovation Hub will build upon the region's industrial capabilities and is expected to create 1,600 jobs and \$284 million in economic impact within the next seven years.<sup>37</sup>

- Ottawa County is a part of the Lake Erie Shores & Island region, with island towns like Put-In-Bay which are considered popular tourist attractions. This region is one of the most visited destinations in the state, with an estimated 12.0 million visitors per year providing an annual economic impact of around \$2.7 billion, \$354.0 million in tax revenue, and over 14,000 jobs.<sup>38</sup>
- Based on 2020 Census data and Broadband Ohio,<sup>39</sup> approximately 24.0% of households in the AA have a broadband internet subscription, 72.0% of the populated area and 50.5% of households do not have access to the minimum bandwidth needed for basic internet activity. 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>37</sup> [BCSU](#)

<sup>38</sup> [Shores & Islands](#)

<sup>39</sup> [Broadband Ohio](#)



## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TOLEDO OH MSA #45780

### **Lending Test**

Civista's performance under the lending test is adequate. Civista's lending activity demonstrates an excellent responsiveness to the credit needs of the community. Civista has an adequate distribution among borrowers of different income levels and an excellent distribution among businesses of different sizes. Civista has a good geographic distribution of loans with a significant level of lending gaps. Civista makes an adequate level of community development loans. Civista exhibits an adequate record of serving the credit needs of highly economically disadvantaged areas in its AA, low-income individuals, or businesses with gross annual revenue of \$1.0 million or less.

### ***Lending Activity***

Home purchase, refinance, and small business loans were evaluated separately. Small farm, home improvement, multi-family, and other purpose close-end loans were not considered in this evaluation due to limited volume.

Lending activity levels reflect an excellent responsiveness to the credit needs within the AA. The percentage of Civista's lending in the Toledo AA is 4.3%, compared to the percentage of total deposits is 0.8%.

No concentration of loans was identified in the excluded counties in the Toledo MSA.

Lastly, HMDA (home purchase and refinance, respectively) lending received the most weight based on total volume and dollar amount, followed by small business lending.

### ***Distribution by Borrower Income and Revenue Size of the Business***

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

Civista's overall distribution of HMDA lending among borrowers of different income (including LMI) levels is adequate and excellent to business of different sizes.

### ***HMDA Lending***

During the evaluation period, Civista originated 83 HMDA-reportable loans totaling \$21.7 million. Of these loans, 56 were home purchase loans totaling \$16.3 million and 22 were refinance loans totaling \$4.7 million. There were also five home improvement loans totaling \$679,000. Civista's performance was compared to the percentage of families (proxy) and aggregate of all

lenders. The distribution of home purchase loans is adequate and poor for refinance loans. See Appendix E for explicit HMDA-reportable lending data.

### *Home Purchase Lending*

Civista originated 56 home purchase loans totaling \$16.3 million. Civista originated 10 (17.9%) home purchase loans totaling \$1.7 million (10.6%) to borrowers with unknown incomes, compared to aggregate lending performance at 11.4% by volume and 10.5% by dollar amount in 2022 and 11.4% by volume and 11.2% by dollar amount in 2023.

Civista originated three (5.4%) home purchase loans to low-income borrowers totaling \$373,000 (2.3%), which was significantly below the percentage of families at 15.4% by volume and dollar amount. In 2022, Civista's home purchase lending to low-income borrowers at 6.3% by volume and 3.2% by dollar amount exceeded aggregate lending performance at 5.1% by volume and 2.3% by dollar amount. In 2023, the bank's lending to low-income borrowers at 4.2% by volume and 1.4% by dollar amount was below aggregate lending performance at 6.6% by volume and was significantly below at 3.0% by dollar amount.

Civista originated six (10.7%) home purchase loans to moderate-income borrowers totaling \$1.0 million (6.4%), which was below the percentage of families at 18.9% by volume and was significantly below by dollar amount. In 2022, Civista's home purchase lending to moderate-income borrowers at 9.4% by volume and 4.8% by dollar amount was below aggregate lending performance at 18.5% by volume and was significantly below at 12.0% by dollar amount. In 2023, the bank's lending to moderate-income borrowers at 12.5% by volume and 8.0% by dollar amount was below aggregate lending performance at 17.8% by volume and 10.9% by dollar amount.

Borrower distribution of home purchase loans to low-income borrowers is adequate, considering performance fell well below proxy and was comparable to aggregate performance. Borrower distribution to moderate-income borrowers is adequate, considering performance fell below proxy and aggregate performance.

### *Refinance Lending*

Civista originated 22 refinance loans totaling \$4.7 million. Civista originated five (22.7%) refinance loans totaling \$530,000 (11.2%) to borrowers with unknown incomes, compared to aggregate lending performance at 6.8% by volume and 9.3% by dollar amount in 2022 and 6.0% by volume and 7.5% by dollar amount in 2023.

Civista originated one (4.5%) refinance loan to a low-income borrower totaling \$165,000 (3.5%), which was significantly below the percentage of families at 15.4% by volume and dollar amount. In 2022, Civista's refinance lending to low-income borrowers at 5.6% by volume and 3.8% by dollar amount was below aggregate lending performance at 8.9% by volume and slightly below at 4.9% by dollar amount. In 2023, the bank did not originate any refinance loans to low-income

borrowers, compared to aggregate lending performance at 11.9% by volume and 7.7% by dollar amount.

Civista did not originate any refinance loans to moderate-income borrowers, compared to the percentage of families at 15.7%. In 2022, aggregate lending performance was 21.4% by volume and 15.6% by dollar amount. In 2023, the aggregate lending performance was 24.0% by volume and 19.1% by dollar amount.

Borrower distribution of refinance loans to LMI borrowers is poor, considering performance fell significantly below proxy and aggregate performance.

### *Small Business Lending*

Civista originated 24 small business loans to businesses of different sizes totaling \$4.4 million, and one loan totaling \$336,000 was extended to a business with unknown gross annual revenue. Civista's performance was compared to the percentage of small businesses (proxy) and aggregate lending data.

Civista originated 23 (95.8%) by volume and \$4.1 million (92.4%) by dollar amount were originated to businesses with revenue of \$1.0 million or less, which exceeded the percentage of small businesses at 88.9%. In 2022, Civista's lending to small businesses at 91.7% by volume and 86.6% by dollar amount significantly exceeded aggregate lending performance at 52.9% by volume and 36.0% by dollar amount. In addition, 75.0% of Civista's small business 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.

Considering lending exceeded demographic and aggregate comparators and Civista's willingness to lend in smaller amounts, this exhibits an excellent responsiveness to the credit needs of small business in the AA. Small dollar loans tend to represent amounts typically requested by small businesses. Therefore, the distribution of small business loans to businesses of different sizes is excellent.

### *Geographic Distribution of Loans*

Civista's overall geographic distribution is good. HMDA lending is good and small business lending is adequate considering the limited number of owner-occupied housing units and businesses in LMI tracts. Civista has a significant level of lending gaps in the Toledo AA.

Lending Penetration								
Tract Income	OH Toledo MSA - 2022				OH Toledo MSA - 2023			
	# Tracts	Tracts w/ no loans	Tracts w/ Loans	Penetration	# Tracts	Tracts w/ no loans	Tracts w/ Loans	Penetration
Low	1	0	1	100.0%	1	1	0	0.0%
Moderate	4	2	2	50.0%	4	1	3	75.0%
Middle	21	10	11	52.4%	21	11	10	47.6%
Upper	18	8	10	55.6%	18	8	10	55.6%
Unknown	2	2	0	0.0%	2	2	0	0.0%
Total	46	22	24	52.2%	46	23	23	50.0%

Civista was able to penetrate approximately 51.0% of total tracts during the evaluation period. There were no lending gaps in the low-income tract in Wood County in 2022 and no loans in this tract in 2023. However, this tract only has 3.0% of total housing units and 96.0% of these units are either rental or vacant. Lending gaps were moderate in moderate-income tracts with a penetration rate of approximately 62.5%. However, this tract only has 8.0% of total housing units and 60.0% of these units are either rental or vacant. The high percentage of rentals is because this AA is a college town. BGSU is in Wood County, and the University of Toledo is only 26 miles north of BGSU in Lucas County. Also, The Ohio State University and BGSU each have satellite campuses in Ottawa County. As a result, lending opportunities in these tracts are likely to be limited. Lastly, Civista only has a 0.6% deposit market share in this very competitive market.

### *HMDA Lending*

During the evaluation period, Civista originated 83 HMDA-reportable loans totaling \$21.7 million. Of these loans, 56 were home purchase loans totaling \$16.3 million and 22 were refinance loans totaling \$4.7 million. There were also five home improvement loans totaling \$679,000.

Civista's performance was compared to the percentage of owner-occupied units (proxy) and aggregate of all lenders. The distribution of home purchase loans is excellent and adequate for refinance loans, especially considering the limited number of owner-occupied units in these tracts. See Appendix E for explicit HMDA-reportable lending data.

### *Home Purchase Lending*

Civista originated two (3.6%) home purchase loans in the low-income tract totaling \$530,000 (3.3%), which significantly exceeded the percentage of owner-occupied units at 0.2% by volume and dollar amount. In 2022, Civista's home purchase lending in the low-income tract at 6.3% by volume and 6.4% by dollar amount significantly exceeded aggregate lending performance at 0.7% by volume and 0.6% by dollar amount. In 2023, Civista had no loans which was significantly below the aggregate lending performance at 0.2% by volume and 0.2% by dollar amount.

Civista originated seven (12.5%) home purchase loans in moderate-income tracts totaling \$954,000 (5.9%), which significantly exceeded the percentage of owner-occupied units at 5.7% by volume and exceeded the percentage by dollar amount. In 2022, Civista's home purchase lending in moderate-income tracts at 15.6% by volume and 8.2% by dollar amount significantly exceeded aggregate lending performance at 5.5% by volume and 4.0% by dollar amount. In 2023, the bank's lending in moderate-income tracts at 8.3% by volume and 3.5% by dollar significantly exceeded aggregate lending performance at 3.5% by volume and was comparable in dollar amount at 3.6%.

Geographic distribution of home purchase loans in LMI tracts is excellent, considering performance significantly exceeded proxy and aggregate performance.

### *Refinance Lending*

Civista originated one (4.5%) refinance loan in the low-income tract totaling \$122,000 (2.6%), which significantly exceeded the percentage of owner-occupied units at 0.2% by volume and dollar amount. In 2022, Civista's refinance lending in the low-income tract at 5.6% by volume and 2.8% by dollar amount significantly exceeded aggregate lending performance at 0.5% by volume and 0.4% by dollar amount. In 2023, the bank's lending in the low-income tract at 0.0% by volume and 0.0% by dollar amount was significantly below the aggregate lending performance at 0.2% by volume and 0.2% by dollar amount.

Civista did not originate any refinance loans in moderate-income tracts, compared to the percentage of owner-occupied units at 5.7%. In 2022, aggregate lending performance was 5.7% by volume and 4.6% by dollar amount which was significantly below aggregate lending. In 2023, aggregate lending performance was 3.9% by volume and 2.8% by dollar amount.

Geographic distribution of refinance loans (one loan) in the low-income tract is adequate, considering performance significantly exceeded proxy and aggregate lending performance. Geographic distribution is poor in moderate-income tracts, considering no loans were originated in these tracts.

### *Small Business Lending*

Civista originated 24 small business loans totaling \$4.4 million. Civista's performance was compared to the percentage of total businesses by tract (proxy) and aggregate lender data. The distribution of small business loans is adequate.

Civista did not originate small business loans in the low-income tract, compared to the percentage of total businesses in the tract at 2.2% and the aggregate lending performance at 1.6% by volume and 0.7% by dollar amount.

Civista originated one (4.2%) small business loan in a moderate-income tract totaling \$10,000 (0.2%), which was below the percentage total businesses in these tracts at 7.2% by volume and

significantly below by dollar amount. In 2022, the aggregate lending performance was 6.1% by volume and 7.5% by dollar amount.

While performance fell significantly below proxy and aggregate lending performance, and Civista only originated one loan in LMI tracts, the geographic distribution of small business loans in LMI tracts is adequate considering the limited number of businesses in these tracts.

### ***Community Development Loans***

Civista originated one community development loan totaling \$1.3 million that supported affordable housing. This loan funded non-subsidized rental housing in a moderate-income tract. These funds helped a small landlord to purchase a multi-family dwelling with the majority of units (75 units) having documented affordable rents.

This loan represents 1.6% of community development loans by dollar amount, compared to 4.3% total lending in the AA and ranks as Civista's fifth-highest percentage of community development lending during the evaluation period. Community contacts stressed the critical need for all aspects of affordable housing, and this loan is responsive to these expressed needs.

Civista makes an adequate level of community development loans in the Toledo AA and exhibits an adequate record of serving the credit needs of LMI individuals.

### **Investment Test**

Qualified investments took the form of small dollar donations and grants in the Toledo AA. Civista made one donation totaling \$1,100 that supported a nonprofit that provides wraparound services to LMI individuals and families. Civista also processed and disbursed three Welcome Home grants totaling \$50,000. These grants assist LMI homebuyers with down payments and closing costs when purchasing their primary residence.

Qualified contributions represent 0.2% of community development investments by dollar amount, compared to total percentage of deposits at 0.8% and total percentage of branches at 4.9%. This ranks as Civista's lowest percentage of qualified investments and contributions during the evaluation period. While Civista did not obtain complex investments during this evaluation period, Civista has a limited presence in this competitive market.

Civista makes poor level of qualified investments and contributions in the Toledo AA. This seems reasonable given the bank's limited market presence in this competitive market. However, there are opportunities to address multiple community development needs through qualified investments and contributions. In addition to the critical need to address all aspects of affordable housing, community stakeholders also expressed the need for homelessness prevention, reliable public transportation, blight elimination, affordable small dollar loans for LMI individuals and

entrepreneurs, and funding large-scale redevelopment projects to help spur economic growth and job creation.

## Service Test

Retail services are reasonably accessible, and Civista provides a relatively high level of community development services.

## Retail Services

As a result of Comunibanc acquisition in July 2022, Civista acquired a branch with a full-service ATM in Bowling Green (Wood County) in a middle-income tract. Civista also has an existing branch with a cash-only ATM in Port Clinton (Ottawa County) in a middle-income tract.

Civista has not closed any branches in this AA since the previous evaluation. Civista's record of opening and closing offices has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and to LMI households.

Business hours and services provided do not vary in a way that inconveniences certain portions of the AA, including LMI geographies and LMI households and are consistent with the services and hours discussed in the "Institution" assessment section.

The Bowling Green branch offers drive-thru services and extended and weekend hours of service. The Port Clinton branch does not offer drive-thru services or extended/weekend hours of service. Branch offices in this AA represent 4.9% of Civista's total branches.

The following table illustrates the percentage of branch offices and ATMs in low-, moderate-, middle-, and upper-income census tracts in comparison to the number and percentage of census tracts and the percentage of households and businesses in those tracts.

**Geographic Distribution of Branches & ATMS**  
Assessment Area: Toledo OH MSA

Tract Category	Branches							ATMs								Demographics						
	Total Branches				Drive-thrus	Extended Hours	Weekend Hours	Total ATMs			Full Service ATMs			Cash only ATMs			Census Tracts		Households	Total Businesses		
			Open	Closed								Open	Closed			Open					Closed	
	#	%	#	#	#	#	#	#	%	#	%	#	#	#	%	#	#	#	%	%	%	
Low	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	1	2.2%	3.4%	2.2%
DTO	0		0	0	0		SA	0		0		0	0	0		0	0					
Moderate	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	4	8.7%	9.0%	7.2%
DTO	0		0	0	0		SA	0		0		0	0	0		0	0					
Middle	2	100.0%	1	0	1	1	1	Total	2	100.0%	1	100.0%	1	0	1	100.0%	0	0	21	45.7%	42.6%	39.6%
DTO	0		0	0	0		SA	0		0		0	0	0		0	0					
Upper	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	18	39.1%	44.5%	49.8%
DTO	0		0	0	0		SA	0		0		0	0	0		0	0					
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	2	4.3%	0.6%	1.2%
DTO	0		0	0	0		SA	0		0		0	0	0		0	0					
Total	2	100%	1	0	1	1	1	Total	2	100%	1	100%	1	0	1	100%	0	0	46	100%	100%	100%
DTO	0		0	0	0		SA	0		0		0	0	0		0	0					

Based on 2023 FFIEC Census Data

Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

While Civista does not maintain any branches in LMI tracts in the Toledo AA; there are limited tracts and households and businesses in these tracts. However, Civista was able to originate loans in the low-income tract and in 75.0% of the four moderate-income tracts during the evaluation period. Considering these factors, delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in the Toledo AA.

### ***Community Development Services***

During the evaluation period, 12 employees assisted 10 organizations totaling 100 hours of community development service to local organizations that provide multiple services throughout the AA. This represents 11.4% of total service hours, compared to the total percentage of branches at 4.9%. The hours of service provided in this AA equates to 0.1 ANP. This ranks as Civista's second-highest percentage of community development services during the evaluation period.

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

Purpose of CD Service	# Services	# Organizations	# Employees*	# Hours
Services to LMI	38	6	7	62
Affordable Housing	16	2	4	35
Economic Development	3	2	1	3
<b>Total</b>	<b>57</b>	<b>10</b>	<b>12</b>	<b>100</b>

*\*Some employees may be double-counted if performed more than one service*

Employees provided financial expertise through leadership positions in multiple community organizations that provide services to LMI individuals and families and promotes affordable housing and economic development. Community development services include 60 hours serving on boards and committees, 28 hours providing technical expertise, and 12 hours of financial literacy.

Examples of impactful community development services include:

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

- An employee serves on the board of a chamber foundation that encourages economic development initiatives.
- An employee serves on steering committee for an organization that develops strategies to attract and retain businesses in downtown area.
- Three employees serve as board/committee members of a large nonprofit housing organization that provides housing opportunities and building sustainable communities.
- An employee serves as a board/committee member of a county organization that focuses on the needs and well-being of older adults, particularly LMI seniors.



### **Technical Expertise**

- Four employees provided technical expertise to three organizations related to fundraising, reviewing grant applications, and qualifying prospective LMI first-time homebuyers.

### **Financial Literacy**

- Two employees participated in small business expo and led session(s) covering various financing options for businesses.

Civista provides a relatively high level of community development services in the Toledo AA. Community contacts stressed the critical need for all aspects of affordable housing, along with wraparound services to LMI individuals and families and economic development initiatives. Community development services are responsive to these expressed needs.

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

**DESCRIPTION OF INSTITUTION'S OPERATIONS**

- **Akron MSA**
  - As of December 31, 2023, Civista operated one branch in this AA, representing 2.4% of its branches.
  - As of December 31, 2023, Civista had \$58.7 million in deposits in this AA, representing a market share of 0.4% and 2.0% of its deposits.
- **Cleveland-Elyria MSA**
  - As of December 31, 2023, Civista operated one branch in the AA, representing 2.4% of its branches.
  - As of December 31, 2023, Civista had \$92.7 million in deposits in this AA, representing a market share of 0.1% and 3.1% of its deposits.
- **Columbus MSA**
  - As of December 31, 2023, Civista operated three branches in the AA, representing 7.3% of its branches.
  - As of December 31, 2023, Civista had \$89.4 million in deposits in this AA, representing a market share of 0.1% and 3.1% of its deposits.
- **Dayton-Kettering MSA**
  - As of December 31, 2023, Civista operated three branches in the AA, representing 7.3% of its branches.
  - As of December 31, 2023, Civista had \$143.3 million in deposits in this AA, representing a market share of 1.4% and 4.8% of its deposits.
- **Mansfield MSA**
  - As of December 31, 2023, Civista operated two branches in the AA, representing 4.9% of its branches.
  - As of December 31, 2023, Civista had \$98.5 million in deposits in this AA, representing a market share of 4.0% and 3.3% of its deposits.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

Using available facts and data, including performance and demographic information, each AA's performance was evaluated and compared with Civista's overall performance. The conclusions regarding performance are provided in the table below. Please refer to the tables in Appendices F and G for information regarding these areas.

Assessment Area	Lending Test	Investment Test	Service Test
Akron MSA	Above	Consistent	Consistent
Cleveland-Elyria MSA	Consistent	Consistent	Consistent
Columbus MSA	Consistent	Consistent	Consistent
Dayton-Kettering MSA	Below	Consistent	Below
Mansfield MSA	Below	Below	Below
<i>Performance in the limited-scope AAs did not impact to the overall rating.</i>			

For the lending test, Civista received a High Satisfactory rating. Performance in the Akron AA is above the overall performance in Ohio, consistent in the Cleveland and Columbus AAs, and below in the Dayton and Mansfield AAs. Lending activity is excellent in the Akron, Cleveland, and Columbus AAs and adequate in the Dayton and Mansfield AAs. Borrower distribution is good in the Mansfield AA; adequate in the Akron, Columbus, and Dayton AAs; and poor in the Cleveland AA. Distribution among businesses of different sizes is excellent in the Akron, Cleveland, and Columbus AAs; good in the Mansfield AA; and adequate in the Dayton AA. Geographic distribution is excellent in the Akron and Cleveland AAs and adequate in the Columbus, Dayton, and Mansfield AAs. Civista is a leader in making community development loans in the Akron AA, makes a relatively high level in the Cleveland and Columbus AAs, makes an adequate level in the Dayton AA, and few, if any community development loans in the Mansfield AA. These levels of performance are primarily due to the level of lending activity and community development lending relative to Civista's operational presence in the AAs.

For the investment test, Civista received an Outstanding rating. Performance in the Akron, Cleveland, Columbus, and Dayton AAs is consistent with overall performance in Ohio; and performance is below in the Mansfield AA. The level of qualified community development investments is excellent in the Akron, Cleveland, Columbus, and Dayton AAs and Civista makes occasional use of complex investments to support community development initiatives in these AAs. The level of qualified community development investments is poor in the Mansfield AA. These levels of performance are primarily due to the occasional use of complex investments and responsiveness to credit and community development needs relative to Civista's operational presence in the AAs.

For the service test, Civista received a High Satisfactory rating. Performance in the Akron, Cleveland, and Columbus AAs is consistent with the overall performance in Ohio; and performance is below in the Dayton and Mansfield AAs. The accessibility of delivery systems is unreasonably inaccessible in all five AAs. These urban AAs have no branches in LMI tracts while 95.0% of LMI tracts in Ohio are in these AAs; however, Civista has a minimal presence in these competitive markets. Regardless, Civista was a leader in providing community development services in the Akron, Cleveland, and Columbus AAs; provides a relatively high level in the Dayton AA; and a limited level in the Mansfield AA. These levels of performance are primarily due to the level of community development services provided relative to Civista's operational presence in the AAs.

## STATE OF INDIANA

### CRA RATING for the State of Indiana:<sup>40</sup> **SATISFACTORY**

**The lending test is rated: High Satisfactory**

**The investment test is rated: Low Satisfactory**

**The service test is rated: Low Satisfactory**

The major factors supporting this rating include:

- An excellent responsiveness to credit needs;
- A good distribution of loans among borrowers of different income levels and excellent distribution to businesses of different revenue sizes;
- An excellent geographic distribution of loans throughout the AA;
- A poor record of serving the credit needs of low-income individuals and areas and very small businesses exhibited;
- Makes few, if any, community development loans;
- An adequate level of qualified community development investments and grants;
- Retail delivery systems are readily accessible to all geographies and individuals of different income levels and businesses of different revenue sizes;
- A record of opening and closing banking centers that has not adversely affected the accessibility of delivery systems;
- Banking services and hours that do not vary in a way that inconveniences any portions of the AAs; and,
- Provides a limited level of community development services.

## SCOPE OF EVALUATION

A full-scope review was conducted for the Cincinnati OH-KY-IN MSA (Dearborn AA) and a limited-scope review was conducted for Nonmetropolitan Indiana. The time period and products evaluated for these AAs are consistent with the scope discussed in the "Institution" section of this report.

Borrower distribution received greater weight than geographic distribution based on the overall percentage of LMI geographies being greater than the overall percentage of LMI families.

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<sup>40</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

The Dearborn AA received greater weight in determining the CRA rating for the state, since it had the largest lending volumes and number of banking centers and ranks first in the institution's share of lending, deposits, and branches during the evaluation period.

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE STATE OF INDIANA

Lending activity accounted for 22.4% of Civista's total lending activity and deposits accounted for 20.0% of Civista's total deposits. HMDA-reportable lending in Indiana represented 24.7% of Civista's total HMDA lending and CRA-reportable lending represented 7.4% of Civista's total CRA lending. As of June 30, 2023, Civista ranks 43<sup>rd</sup> among 132 insured institutions and has a deposit market share of 0.3% in Indiana.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF INDIANA

### Lending Test

Civista's performance under the lending test in Indiana is rated High Satisfactory. Primary ratings drivers include no lending gaps and excellent responsiveness to AA credit needs.

Civista has a good distribution among borrowers of different income levels and an excellent distribution among businesses of different sizes. Civista has an excellent geographic distribution of loans with no gaps in lending.

### *Lending Activity*

Civista originated 658 HMDA loans totaling \$87.9 million, 30 small business loans totaling \$6.7 million, and three small farm loans totaling \$450,000 during the evaluation period in Indiana. Civista's percentage of total lending in Indiana is 22.4%, which is greater than the percentage of total deposits at 20.0%.

Civista's lending activity reflects an excellent responsiveness to the credit needs across its AAs in Indiana. Lending activity is excellent in the Dearborn AA and adequate in Nonmetropolitan Indiana.

A small concentration of loans was identified in excluded counties in the Cincinnati OH-KY-IN MSA. Civista originated 47 HMDA loans in Hamilton County, Ohio and 46 HMDA loans in Kenton County, Kentucky. This represents 6.7% and 6.6% of HMDA loans originated in the MSA, respectively during the evaluation period.

### ***Borrower-Income, Business Revenue Size, and Geography***

The overall distribution of loans among borrowers of different income levels is good and excellent to businesses of different sizes. HMDA-reportable lending to borrowers of different income levels is good in the Dearborn AA and excellent in Nonmetropolitan Indiana. The penetration among businesses of different sizes is excellent in the Dearborn AA. The overall geographic distribution of loans reflects an excellent penetration in Indiana, with no lending gaps. The geographic distribution of loans is excellent in Dearborn AA, with no lending gaps. Nonmetropolitan Indiana has no LMI geographies; however, geographic distribution in middle- and upper-income tracts was analyzed and reflects adequate penetration.

Lastly, Civista exhibits a poor record of serving the credit needs of low-income individuals and areas and businesses with gross annual revenue of \$1.0 million or less in Indiana.

A detailed analysis for the borrower-income distribution and geographic distribution is provided with the analysis for each AA.

### ***Community Development Loans***

Civista originated one community development loan totaling \$100,000 in Indiana (2.4%) in Nonmetropolitan Indiana, compared to the percentage of total lending at 22.4%. The community development loan provided working capital to a nonprofit that helps Indianans experiencing homelessness.

Civista makes a low level of community development loans in Nonmetropolitan Indiana and few, if any community development loans in the Dearborn AA.

### **Investment Test**

Civista's performance under the investment test in Indiana is rated Low Satisfactory.

Civista holds five prior period investments which include revenue bonds, municipal bonds, and a mortgage-backed security with a book value of approximately \$1.7 million. These investments help support infrastructure improvements in a community that serves a moderate-income area, LMI school districts, and affordable housing. These investments represent 8.1% of total qualified investments.

Qualified investments also took the form of small dollar donations totaling \$24,300. Approximately 23.1% of Civista's small dollar donations by dollar amount benefited Indiana.

Civista also processed and disbursed six Welcome Home grants totaling \$105,000 (16.6%) in its AAs. The FHLB of Cincinnati's Welcome Home Program offers grants (up to \$20,000) to assist

LMI homebuyers with down payments and closing costs when purchasing their primary residence.

Approximately 8.4% of Civista's qualified investments, donations, and grants by dollar amount benefited Indiana, compared to the percentage of total deposits at 20.0% and total branches at 19.5%. Civista has an adequate level of qualified community development investments, donations, and grants in Indiana. Civista has an adequate level of qualified community development investments and contributions in the Dearborn AA and Nonmetropolitan Indiana.

Additional information regarding performance under the investment test is provided in the respective analyses for each AA.

### **Service Test**

Civista's performance under the service test in Indiana is rated Low Satisfactory. Retail services are readily accessible and Civista provides a limited level of community development services in Indiana.

For details regarding the institution's performance in the individual AAs, refer to the respective AA's "Service Test" section in this report.

### ***Retail Services***

Civista maintains six branches with full-service ATMs and two branches with cash-only ATMs, representing 19.5% of the bank's total branches. Lastly, Civista has two stand-alone cash-only ATMs in the Dearborn AA. Since the previous evaluation, Civista has not opened or closed any branches. As a result, the record of opening and closing branches has not adversely affected the accessibility of its delivery systems. In Nonmetropolitan Indiana, Civista has two branches with full-service ATMs in middle- and upper-income tracts and one branch with a cash-only ATM in an upper-income tract in Osgood, Milan, and Versailles, respectively.

Overall retail delivery systems are readily accessible to Civista's geographies and individuals of different income levels in Indiana. Delivery systems are readily accessible in the Dearborn AA and accessible in Nonmetropolitan Indiana. Banking services do not vary or inconvenience any portion of Civista's AAs in Indiana. All eight branches offer drive-thru facilities, and seven branches offer extended hours and weekend hours of service, including the branches in LMI tracts.

### ***Community Development Services***

Civista provides a limited level of community development services in Indiana, with 53 hours (6.0%) of community development services supporting various service activities during the evaluation period. Community development service hours in Indiana equate to 0.03 ANP.

Eleven (11) employees provided 24 services to 12 organizations that promote or facilitate community services targeted to LMI individuals and economic development by financing small businesses in Indiana.

Community development services include 28 hours serving on boards/committees, 13 hours of technical expertise, and 12 hours providing financial literacy training to the community by providing leadership and engaging in activities promoting or facilitating services for LMI individuals and economic development in the bank's AAs.

Civista provides a limited level of community development services in the Dearborn AA and an adequate level in Nonmetropolitan Indiana.



**METROPOLITAN STATISTICAL AREA**  
*(Full-scope Review)***DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE  
CINCINNATI OH-KY-IN MSA #17140**

The Dearborn AA consists of the entirety of Dearborn County, Indiana, which is in the Cincinnati OH-KY-IN MSA.<sup>41</sup> The AA excludes Brown, Butler, Clermont, Hamilton, and Warren counties in Ohio; Boone, Bracken, Campbell, Gallatin, Grant, Kenton, and Pendleton counties in Kentucky; and Franklin, Ohio, and Union counties in Indiana. Dearborn County is in the southeast portion of Indiana, 30 minutes from downtown Cincinnati. The Census Bureau released new size and population data from the 2020 Census on August 12, 2021. Due to these changes, this AA was comprised of the following tracts for this analysis.

<b>Income Tract Designations</b>	
<b>Assessment Area: IN Cincinnati MSA</b>	
<b>Tract Income Level</b>	<b>2022-2023</b>
	<b>Number of Tracts</b>
Low	1
Moderate	2
Middle	10
Upper	0
Unknown	0
<b>Total</b>	<b>13</b>

Based on 2020 Census data, the AA gained one low- and two middle-income tracts. There were no changes to the number of moderate-, upper-, and unknown-income tracts since the previous evaluation.

As of June 30, 2023, the FDIC summary of deposits report ranked Civista first among seven financial institutions in the AA with 40.4% of the deposit market share, compared to second ranked U.S. Bank National Association with 18.5% and third ranked First Financial Bank with 16.0% of the deposit market share. By comparison, Civista ranked 19<sup>th</sup> among 57 financial institutions in the MSA with 0.3% of the deposit market share, compared to first ranked U.S. Bank National Association with 53.8% and second ranked Fifth Third Bank, National Association with 26.1% of the deposit market share. Deposits in this AA accounted for 16.4% of Civista's total deposits.

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<sup>41</sup> While the Cincinnati OH-KY-IN MSA is a multi-state metropolitan area, lending and community development activity is being evaluated in the State of Indiana, because the bank has no branches or deposit-taking ATMs in the MSA's counties in Ohio or Kentucky.

The 2023 HMDA peer market data shows that Civista ranked first among 148 reporters in the AA having originated 200 loans. The second and third ranked HMDA lenders in this market, First Financial Bank originated 105 loans and American Pacific Mortgage Corporation originated 87 loans, respectively. Civista also ranked first among HMDA lenders in 2022 and originated 297 loans. Civista's HMDA-reportable lending decreased by 32.7% from 2022 to 2023.

Civista ranked ninth among 34 CRA reporters in the AA in 2023 having originated 14 loans. The top four CRA reporters in this market, American Express National Bank originated 209 loans, U.S. Bank National Association originated 136 loans, JP Morgan Chase Bank National Association originated 95 loans, and Synchrony Bank originated 90 loans, respectively. Civista ranked 11<sup>th</sup> among CRA reporters in this market in 2022 and originated nine loans. Civista's CRA-reportable (small business) lending increased by 55.6% from 2022 to 2023.

### Community Contacts

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 interview was with a representative from a local foundation focusing on strategic charitable initiatives in Dearborn County. The contact stated that many people seem to be close to poverty but may not qualify for government assistance programs. Rising rents and a lack of affordable housing, along with insufficient government assistance, creates significant challenges for LMI households, which can lead to housing insecurity and an increasing risk of homelessness. The contact indicated that the lack of affordable childcare also contributes to an increasing risk of housing instability and food insecurity for LMI families. The contact stated there are opportunities for local financial institutions to help alleviate poverty by offering banking services and financial literacy programs to LMI communities, which can help individuals and entrepreneurs save and manage their finances.

### Population Characteristics

Population Change			
Assessment Area: IN Cincinnati MSA			
Area	2020 Population	2023 Population	Percent Change
Dearborn County	50,679	51,215	1.1%
Cincinnati, OH-KY-IN MSA	2,256,884	2,272,910	0.7%
Indiana	6,785,528	6,862,199	1.1%
Source: 2023 U.S. Census Bureau American Community Survey 2020 U.S. Census Bureau Decennial Census			

- From 2020 through 2023 the AA and Indiana each experienced 1.1% gain in population.
- 78.0% of the AA population was 18 years of age or older, the legal age to enter into a contract.

- The majority of the AA population at 51.0% was between the ages of 25 and 64, which is the prime-working age.
- 17.1 % of the population in the AA was age 65 and over, compared to 15.5% in Indiana.
- A higher elderly population may affect economic growth and the ability of government and communities to provide adequate resources for older adults, including but not limited to, healthcare services.
- 17.7% of the AA's population reside in LMI tracts.
- According to U.S. Census data, Lawrenceburg is the second largest municipality in the AA with 5,194 residents, and its population increased by 1.1% between 2020 and 2023. By contrast, Aurora has population of 3,508 residents, and its population increased by 0.8% between 2020 and 2023.<sup>42</sup>

### Income Characteristics

**Borrower Income Levels**  
**Cincinnati, OH-KY-IN MSA**

FFIEC Estimated Median Family Income	% Change	Low		Moderate		Middle		Upper	
		0	- 49.99%	50%	- 79.99%	80%	- 119.99%	120%	- & above
<b>2022</b>	<b>\$97,400</b>	0	- \$48,699	\$48,700	- \$77,919	\$77,920	- \$116,879	\$116,880	- & above
<b>2023</b>	<b>\$102,300</b>	5.0%	0	- \$51,149	\$51,150	- \$81,839	\$81,840	- \$122,759	\$122,760 - & above

- During the evaluation period, MFI in the MSA increased by 5.0%.
- From 2020 to 2022 MFI increased 17.5% and from 2020 to 2023 MFI increased 23.5%.
- According to 2020 Census data, AA MFI at \$82,864 is 11.6% higher than Indiana MFI at \$73,265.
- Minimum wage for 2023 in Indiana is \$7.25 per hour or \$15,080 annually.<sup>43</sup> The Federal minimum wage is \$7.25 per hour and has remained stagnant since 2009.<sup>44</sup>

<b>Poverty Rates</b>			
<b>Assessment Area: IN Cincinnati MSA</b>			
<b>Area</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Dearborn County	7.8%	7.6%	10.6%
<b>Indiana</b>	<b>11.6%</b>	<b>12.1%</b>	<b>12.5%</b>
<i>Source: Federal Reserve Economic Data   FRED   St. Louis Fed</i>			

- Poverty rates across the AA were consistently lower than rates across Indiana.
- Of the 13,877 families in the AA, 38.0% are designated as LMI with 9.8% living below poverty; compared to 8.9% of families living below poverty across Indiana.

<sup>42</sup> [STATSINDIANA](#)

<sup>43</sup> [Minimum Wage - IN](#)

<sup>44</sup> [Federal Minimum Wage](#)

- Of the 19,279 households in the AA, 9.8% are below the poverty level and 1.9% receive public assistance; compared to 12.5% of households across Indiana that are below the poverty level.
- SNAP<sup>45</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. The table below shows the percentage of the population by county that received SNAP benefits in 2021.

SNAP Benefit Recipients	
Assessment Area: IN Cincinnati MSA	
Area	2021
Dearborn County	6.0%
Source: Federal Reserve Economic Data   FRED   St. Louis Fed	

- Poverty rates (7.6%) in Dearborn County were higher than the percentage of SNAP recipients receiving benefit (6.0%).

### Housing Characteristics

Housing Cost Change						
Assessment Area: IN Cincinnati MSA						
Area	Median Housing Value			Median Gross Rent		
	2020	2022	Percent Change	2020	2022	Percent Change
Dearborn County	\$174,500	\$210,800	20.8%	\$740	\$863	16.6%
Source: 2018-2022 U.S. Census Bureau: American Community Survey						
2016-2020 U.S. Census Bureau: American Community Survey						

- Median housing values across Dearborn County increased 20.8% from 2020 to 2022.
- Overall, housing became less affordable across the AA most likely because MFI did not keep pace with home growth price.
- Based on 2020 Census data, the affordability ratio<sup>46</sup> was 40.6 in the AA compared to 39.1 in Indiana. Housing was generally more affordable across the AA than in other parts of Indiana.
- Median gross rent across Dearborn County increased 16.6% from 2020 to 2022, while MFI increased by 17.5% during this time period. Nonetheless, the rise in median gross rents indicates the need for more affordable housing. According to 2020 Census data, 45.8% of all renters in the AA had rental costs that were greater than 30.0% of their income.

<sup>45</sup> Federal Reserve Economic Data (FRED)

<sup>46</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.

- According to HUD's 2022 Fair Market Rents data,<sup>47</sup> the average rent for a two-bedroom unit in Dearborn County is \$968. Rents rose by 16.6% from 2020 to 2022 compared to a 17.5% increase in MFI from 2020 to 2022.
- According to the National Low Income Housing Coalition,<sup>48</sup> full-time workers must earn at least \$22.07 an hour (\$45,913 annual salary) in Indiana, to afford a two-bedroom rental apartment, which is almost triple 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).
- There are 20,596 housing units in the AA, of which 76.2% are owner occupied, 17.5% are rental and 6.4% are vacant; consequently, there are more households who own their homes than there are renters. Only 8.7% of total housing units are in low-income tracts and 50.1% of the housing units are owner-occupied and 49.9% are either rental or vacant. Only 12.7% of total housing units are in moderate-income tracts and 48.5% of the housing units are owner-occupied and 51.5% are either rental or vacant. With 23.8% of housing units across the AA being either rental or vacant, there may be limited opportunities to originate mortgage loans, particularly in low-income tracts.
- The median age of housing stock across the AA is 41 years old, and 21.3% of housing units were built prior to 1950. The age of the housing stock across the AA demonstrates a potential need for home improvement lending.

Housing Cost Burden						
Assessment Area: IN Cincinnati MSA						
Area	Cost Burden - Owners			Cost Burden - Renters		
	Low Income	Moderate Income	All Owners	Low Income	Moderate Income	All Renters
Dearborn County	52.2%	20.0%	15.1%	68.3%	0.7%	45.3%
Cost Burden is housing cost that equals 30 percent or more of household income						
Source: U.S. Department of Housing and Urban Development (HUD), 2016-2020 Comprehensive Housing Affordability Strategy						

- 52.2% of low-income homeowners and 68.3% of low-income renters are cost burdened, compared to 20.0% of moderate-income homeowners and 0.7% of moderate-income renters.
- Based on 2020 Census data, 45.8% of renters across the AA are cost burdened, compared to 42.3% of renters across Indiana.
- The data shows cost burden disproportionately affects renter-occupied households, particularly low-income renters and low-income homeowners, respectively.
- Cost-burdened renters may have a difficult time saving enough monies to make a sufficient down payment to purchase a home or otherwise afford increasing rents.

<sup>47</sup> [HUD's Fair Market Rents – Final FY2022](#)

<sup>48</sup> [National Low Income Housing Coalition-Indiana](#)

## Labor, Employment, and Economic Characteristics

Unemployment Rates					
Assessment Area: IN Cincinnati MSA					
Area	2019	2020	2021	2022	2023
Dearborn County	3.5%	7.1%	3.3%	2.7%	3.3%
Cincinnati, OH-KY-IN MSA	3.7%	7.0%	4.4%	3.5%	3.3%
Indiana	3.3%	7.3%	3.9%	3.1%	3.3%

Source: Bureau of Labor Statistics(BLS), Local Area Unemployment Statistics

- In response to the COVID-19 pandemic, unemployment rates increased substantially from 2019 to 2020. The average unemployment rate in the AA increased from 3.5% in 2019 to 7.1% in 2020. Subsequently, unemployment rates have rebounded to pre-pandemic rates. AA unemployment rates were comparable to unemployment rates in Indiana during this period.
- According to the Bureau of Labor Statistics, the leading industries in the AA are private sector industries, accommodation and food services, retail trade, health care and social assistance, government and manufacturing.
- According to Hoosiers by the Numbers,<sup>49</sup> major employers in Dearborn County are Matthews Aurora Funeral Solutions, Perfect North Slopes, St. Elizabeth Dearborn Hospital, Walmart Supercenter, Hollywood Casino & Hotel, Anchor Glass Container, and Kroger.
- St. Elizabeth Healthcare plans to build a new 120,000 square foot, \$125 million hospital in Dearborn County expected to open in 2027. The new hospital will neighbor the existing St. Elizabeth Physicians' offices and the new St. Elizabeth Cancer Center-Dearborn. Featuring an emergency department, surgical capabilities, and inpatient care.<sup>50</sup>
- According to One Dearborn County, the county's economic development organization, Dearborn County is entering a new growth era for workforce housing with more than 7,800 single-family residential units and nearly 3,300 multi-family units expected among the western suburbs by 2024.<sup>51</sup>
- Based on 2020 Census data and BroadbandNow Indiana, 97.5% of residents have access to the minimum bandwidth needed for basic internet activity in Dearborn County.<sup>52</sup> 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>49</sup> [Hoosiers by the Numbers](#)

<sup>50</sup> [Local 12](#)

<sup>51</sup> [One Dearborn](#)

<sup>52</sup> [BroadbandNow](#)

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CINCINNATI OH-KY-IN MSA #17140

### **Lending Test**

Civista's performance under the lending test is good. Civista's lending activity demonstrates an excellent responsiveness to the credit needs of the community. Civista has a good distribution among borrowers of different income levels and an excellent distribution among businesses of different sizes. Civista has an excellent geographic distribution of loans with no gaps in lending. Civista makes few, if any community development loans. Civista exhibits a poor record of serving the credit needs of highly economically disadvantaged areas in its AA, low-income individuals, or businesses with gross annual revenue of \$1.0 million or less.

### ***Lending Activity***

Home purchase, refinance, home improvement, and small business loans were evaluated separately. Small farm, multi-family, and other purpose close-end loans were not considered in this evaluation due to limited volume.

Lending levels reflect an excellent responsiveness to the credit needs within the AA. The percentage of Civista's lending in Dearborn AA is 12.9%, compared to the percentage of total deposits at 16.4%.

A small concentration of loans was identified in two of 15 excluded counties in the Cincinnati MSA. Civista originated 47 HMDA loans in Hamilton County. This represents 6.7% of HMDA loans originated in the MSA during the evaluation period. Civista originated 46 HMDA loans in Kenton County. This represents 6.6% of HMDA loans originated in the MSA during the evaluation period.

HMDA (home purchase, refinance, and home improvement, respectively) lending received the most weight based on total volume and dollar amount, followed by small business lending.

### ***Distribution by Borrower Income and Revenue Size of the Business***

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

Civista's overall distribution to HMDA lending among borrowers of different income (including LMI) levels is good and the distribution is excellent to businesses of different sizes.

### *HMDA Lending*

Civista originated 318 HMDA-reportable loans totaling \$55.6 million. Of these loans, 138 were home purchase loans totaling 33.8 million, 128 were home refinance loans totaling \$17.4 million, and 52 were home improvement loans totaling \$4.4 million. Civista's performance was compared to the percentage of families (proxy) and aggregate lending data. The distribution of home purchase loans is excellent and good for refinance and home improvement loans. See Appendix E for explicit HMDA-reportable lending data.

#### *Home Purchase Lending*

Civista originated 138 home purchase loans totaling \$33.8 million. Civista originated three (2.2%) home purchase loans totaling \$840,000 (2.5%) to borrowers with unknown incomes, compared to aggregate lending performance at 18.1% by volume and dollar amount in 2022 and 15.1% by volume and 15.4% by dollar amount in 2023.

Civista originated 27 (19.6%) home purchase loans to low-income borrowers totaling \$3.7 million (11.0%), which was slightly below the percentage of families at 19.8% by volume and below by dollar amount. In 2022, Civista's home purchase lending to low-income borrowers at 27.0% by volume and 17.6% by dollar amount significantly exceeded aggregate lending performance at 13.1% by volume and 7.8% by dollar amount. In 2023, the bank's lending to low-income borrowers at 13.3% by volume and 7.1% by dollar amount slightly exceeded aggregate lending performance at 12.5% by volume and was below at 6.7% by dollar amount.

Civista originated 39 (28.3%) home purchase loans to moderate-income borrowers totaling \$7.3 million (21.5%), which significantly exceeded the percentage of families at 18.2% by volume and exceeded by dollar amount. In 2022, Civista's home purchase lending to moderate-income borrowers at 31.7% by volume and 27.6% by dollar amount exceeded aggregate lending performance at 24.4% by volume and at 20.2% by dollar amount. In 2023, the bank's lending to moderate-income borrowers at 25.3% by volume and 17.9% by dollar amount was slightly below aggregate lending performance at 27.7% by volume and 22.4% by dollar amount.

Borrower distribution of home purchase loans to LMI borrowers is excellent, considering performance exceeded proxy and aggregate performance.

#### *Refinance Lending*

Civista originated 128 refinance loans totaling \$17.4 million. Civista originated 10 (7.8%) refinance loans totaling \$1.1 million (6.2%) to borrowers with unknown incomes, compared to aggregate lending performance at 8.6% by volume and 8.3% by dollar amount in 2022 and 7.7% by volume and 9.9% by dollar amount in 2023.



Civista originated 22 (17.2%) refinance loans to low-income borrowers totaling \$1.9 million (10.8%), which was slightly below the percentage of families at 19.8% by volume and below by dollar amount. In 2022, Civista's refinance lending to low-income borrowers at 14.9% by volume and 9.3% by dollar amount was slightly below the aggregate lending performance at 16.5% by volume and 11.1% by dollar amount. In 2023, the bank's lending to low-income borrowers at 25.9% by volume and 16.1% by dollar amount significantly exceeded aggregate lending performance at 17.2% by volume and exceeded at 11.3% by dollar amount.

Civista originated 34 (26.6%) refinance loans to moderate-income borrowers totaling \$4.1 million (23.7%), which exceeded the percentage of families at 18.2% by volume and by dollar amount. In 2022, Civista's refinance lending to moderate-income borrowers at 29.7% by volume and 27.4% by dollar amount slightly exceeded aggregate lending performance at 26.9% by volume and at 24.1% by dollar amount. In 2023, the bank's lending to moderate-income borrowers at 14.8% by volume and 10.9% by dollar amount was below aggregate lending performance at 27.6% by volume and significantly below at 26.1% by dollar amount.

Borrower distribution of home purchase loans to low-income borrowers is good, considering performance fell slightly below proxy and slightly exceeded aggregate performance. Borrower distribution to moderate-income borrowers is good, considering performance exceeded proxy and fell slightly below aggregate performance.

#### *Home Improvement Lending*

Civista originated eight (15.4%) home improvement loans to low-income borrowers totaling \$420,000 (9.6%), which was slightly below the percentage of families at 19.8% by volume and significantly below by dollar amount. In 2022, the bank did not originate home improvement loans to low-income borrowers, compared to the aggregate lending performance at 10.3% by volume and 7.5% by dollar amount. In 2023, the bank's lending to low-income borrowers at 15.7% by volume and 10.3% by dollar amount exceeded aggregate lending performance at 17.2% by volume and significantly exceeded at 6.6% by dollar amount.

Civista originated 14 (26.9%) home improvement loans to moderate-income borrowers totaling \$752,000 (17.2%), which exceeded the percentage of families at 18.2% by volume and was comparable by dollar amount. In 2022, the bank did not originate home improvement loans to moderate-income borrowers, compared to aggregate lending performance at 19.1% by volume and 14.7% by dollar amount. In 2023, the bank's lending to moderate-income borrowers at 27.5% by volume and 18.5% by dollar amount slightly exceeded aggregate lending performance at 24.9% by volume and at 18.3% by dollar amount.

Borrower distribution of home improvement loans to low-income borrowers is adequate, considering performance fell below proxy and aggregate performance. Borrower distribution to moderate-income borrowers is good, considering performance exceeded proxy and fell below aggregate performance.

### *Small Business Lending*

Civista originated 22 small business loans to businesses of different sizes totaling \$5.4 million, and two (9.1%) loans totaling \$396,000 (7.4%) were extended to businesses with unknown gross annual revenue. Civista's performance was compared to the percentage of small businesses (proxy) and aggregate lending performance in 2022.

Civista originated 20 (90.9%) loans totaling \$5.0 million (92.6%) to businesses with revenue of \$1.0 million or less, which exceeded the percentage of small business at 93.6% and was slightly below at 93.6%. In 2022, Civista's small business lending at 77.8% by volume and 80.9% by dollar amount exceeded aggregate lending performance at 60.5% by volume and significantly exceeded at 48.5% by dollar amount. In addition, 81.8% of small business 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.

Considering lending exceeded demographic and aggregate comparators and Civista's willingness to lend in smaller amounts, this exhibits an excellent responsiveness to the credit needs of small business in the AA. Small dollar loans tend to represent amounts typically requested by small businesses. Therefore, the distribution of small business loans to businesses of different sizes is excellent.

### *Geographic Distribution of Loans*

Civista's geographic distribution is excellent. The geographic distribution of HMDA and small business loans is excellent. Civista has no lending gaps in the Dearborn AA.

Lending Penetration								
Tract Income	IN Cincinnati MSA - 2022				IN Cincinnati MSA - 2023			
	# Tracts	Tracts w/ no loans	Tracts w/ Loans	Penetration	# Tracts	Tracts w/ no loans	Tracts w/ Loans	Penetration
Low	1	0	1	100.0%	1	0	1	100.0%
Moderate	2	0	2	100.0%	2	0	2	100.0%
Middle	10	0	10	100.0%	10	0	10	100.0%
Upper	0	0	0	No Tracts	0	0	0	No Tracts
Unknown	0	0	0	No Tracts	0	0	0	No Tracts
Total	13	0	13	100.0%	13	0	13	100.0%

Civista was able to penetrate 100.0% of total tracts during the evaluation period.

### *HMDA Lending*

During the evaluation period, Civista originated 318 HMDA-reportable loans totaling \$55.6 million. Of these loans, 138 were home purchase loans totaling \$33.8 million, 128 were home refinance loans totaling \$17.4 million, and 13 were home improvement loans totaling \$4.4 million. Civista's performance was compared to the percentage of owner-occupied units (proxy) and aggregate of all lenders. The geographic distribution of home purchase and refinance loans is excellent and good to home improvement loans. See Appendix E for explicit HMDA-reportable lending data.

#### *Home Purchase Lending*

Civista originated 11 (8.0%) home purchase loans in the low-income tract totaling \$1.5 million (4.3%), which exceeded the percentage of owner-occupied units at 5.7% by volume and was slightly below by dollar amount. In 2022, Civista's home purchase lending in the low-income tract at 11.1% by volume and 6.7% by dollar amount exceeded aggregate lending performance at 8.0% by volume and at 5.9% by dollar amount. In 2023, the bank's lending in the low-income tract at 5.3% by volume and 2.9% by dollar amount was below aggregate lending performance at 8.0% by volume and 4.5% by dollar amount.

Civista originated 15 (10.9%) home purchase loans in moderate-income tracts totaling \$2.4 million (7.2%), which exceeded the percentage of owner-occupied units at 8.1% by volume and was slightly below by dollar amount. In 2022, Civista's home purchase lending in moderate-income tracts at 11.1% by volume and 9.7% by dollar amount slightly exceeded aggregate lending performance at 9.7% by volume and 8.1% by dollar amount. In 2023, the bank's lending in moderate-income tracts at 10.7% by volume and 6.2% by dollar amount exceeded aggregate lending performance at 9.0% by volume and was comparable to aggregate lending performance at 6.6% by dollar amount.

Geographic distribution of home purchase loans in LMI tracts is excellent, considering performance significantly exceeded proxy and aggregate performance.

#### *Refinance Lending*

Civista originated seven (5.5%) refinance loans in the low-income tract totaling \$710,000 (4.1%), which was comparable to the percentage of owner-occupied units at 5.7% by volume and below by dollar amount. In 2022, Civista's refinance lending in the low-income tract at 5.9% by volume and 4.9% by dollar amount exceeded aggregate lending performance at 4.3% by volume and significantly exceeded at 3.2% by dollar amount. In 2023, the bank's lending in the low-income tract at 3.7% by volume and 1.1% by dollar amount was below aggregate lending performance at 6.1% by volume and significantly below at 3.9% by dollar amount.

Civista originated 19 (14.8%) refinance loans in moderate-income tracts totaling \$2.3 million (13.2%), which significantly exceeded the percentage of owner-occupied units at 8.1% by volume and by dollar amount. In 2022, Civista's refinance lending in moderate-income tracts at 13.9% by volume and 11.7% by dollar amount significantly exceeded aggregate lending performance at 7.6% by volume and 5.3% by dollar amount. In 2023, the bank's lending in moderate-income tracts at 18.5% by volume and 18.0% by dollar amount significantly exceeded aggregate lending performance at 6.4% by volume and 6.2% by dollar amount.

Geographic distribution of refinance loans in the low-income tract is excellent, considering performance was comparable to proxy and aggregate lending performance. Geographic distribution is excellent in moderate-income tracts, considering performance exceeded proxy and significantly exceeded aggregate performance.

#### *Home Improvement Lending*

Civista originated one (1.9%) home improvement loan in the low-income tract totaling \$50,000 (1.1%), which was significantly below the percentage of owner-occupied units at 5.7% by volume and by dollar amount. In 2022, the bank did not originate home improvement loans in the low-income tract, compared to the aggregate lending performance at 2.2% by volume and 1.4% by dollar amount. In 2023, the bank's lending in the low-income tract at 2.0% by volume and 1.2% by dollar amount was below aggregate lending performance at 2.6% by volume and 1.7% by dollar amount.

Civista originated seven (13.5%) home improvement loans in moderate-income tracts totaling \$205,000 (4.7%), which significantly exceeded the percentage of owner-occupied units at 8.1% by volume and was below by dollar amount. In 2022, the bank did not originate home improvement loans in moderate-income tracts, compared to aggregate lending performance at 3.7% by volume and 4.5% by dollar amount. In 2023, the bank's lending in moderate-income tracts at 13.7% by volume and 5.0% by dollar amount significantly exceeded aggregate lending performance at 6.3% by volume and exceeded at 3.4% by dollar amount.

Geographic distribution of home improvement loans in the low-income tract is poor, considering performance fell significantly below comparators. Geographic distribution in moderate-income tracts is excellent, considering performance exceeded proxy and aggregate performance.

#### *Small Business Lending*

During the evaluation period, Civista originated 22 small business loans totaling \$5.4 million. Civista's performance was compared to the percentage of total businesses by tract (proxy) and 2022 aggregate lending data. The distribution of small business loans is excellent.

Civista originated eight (36.4%) small business loans in the low-income tract totaling \$1.3 million (24.3%), which significantly exceeded the percentage of businesses in this tract at 10.7% by

volume and by dollar amount. In 2022, Civista's small business lending in the low-income tract at 22.2% by volume and 19.1% by dollar amount significantly exceeded aggregate lending performance at 11.2% by volume and 10.6% by dollar amount.

Civista originated seven (31.8%) small business loans in moderate-income tracts totaling \$3.2 million (59.6%), which significantly exceeded the percentage of businesses in these tracts at 20.7% by volume and dollar amount. In 2022, Civista's small business lending in moderate-income tracts at 44.4% by volume and 53.7% by dollar amount significantly exceeded aggregate lending performance at 18.5% by volume and 34.9% by dollar amount.

Geographic distribution of small business loans in LMI tracts is excellent, considering performance exceeded proxy and significantly exceeded aggregate performance.

### ***Community Development Loans***

Civista makes few, if any community development loans in the Dearborn AA.

Civista has the capacity and market presence (ranked first in this market with 40.4% of the deposit market share) to be more responsive to community development opportunities, including the ability to make loans that address multiple community development needs. The community contact expressed the need for all aspects of affordable housing, prevention of homelessness (e.g., rental assistance, housing stability case management, legal services, etc.), affordable childcare services, and financial literacy programs to help alleviate poverty. As a result, Civista exhibits a poor record of serving the credit needs of low-income individuals and areas and businesses with gross annual revenue of \$1.0 million or less.

### **Investment Test**

Civista has an adequate level of qualified investments, donations, and grants in the Dearborn AA.

Civista holds two prior period investments with a current book value of approximately \$645,000. These revenue bonds provide funding for infrastructure improvements which help revitalize/stabilize a moderate-income community in the AA.

Qualified investments also took the form of small dollar donations and grants. Civista made 11 donations totaling \$15,800 that supported organizations and nonprofits that provide wraparound services to LMI individuals and families.

Examples of impactful donations include:

- \$5,500 (three donations) to a local food pantry in a low-income tract providing basic human services like food and clothing to LMI families.
- \$3,000 (three donations) to a healthcare organization in a moderate-income tract offering medical care, free pregnancy and counseling services, as well as clothing.

- \$1,300 donation to a nonprofit housing organization that supports neglected and abandoned children.

Civista also processed and disbursed four Welcome Home grants totaling \$80,000 in the Dearborn AA. These grants assist LMI homebuyers with down payments and closing costs when purchasing their primary residence.

Qualified investments and contributions represent 3.4% of community development investments by dollar amount, compared to total percentage of deposits at 16.4% and total percentage of branches at 12.2%. This ranks as Civista's seventh-highest percentage of qualified investments and contributions during the evaluation period. However, qualified investments and contributions address multiple community development needs; in addition to affordable housing, qualified investments and donations support wraparound services to LMI individuals and families and help to revitalize/stabilize a moderate-income community. While Civista was not able to acquire new qualified investments and prior period investments are not necessarily complex, qualified investments and contributions exhibit adequate responsiveness to credit and community development needs.

### **Service Test**

Retail services are readily accessible and Civista provides a limited level of community development services.

#### ***Retail Services***

Civista has not opened or closed any branches since the previous evaluation. Civista's record of opening and closing offices has not adversely affected the accessibility of its delivery systems. Civista's delivery services are readily accessible to portions of Civista's geographies and individuals of different income levels.

Business hours and services provided do not vary in a way that inconveniences certain portions of the AA, including moderate-income geographies and LMI households, and are consistent with the services and hours discussed in the "Institution" assessment. All five branches in this AA offer drive-thru services and four branches offer extended and weekend hours of service.

Civista currently maintains four branches with full-service ATMs and one branch with a cash-only ATM in this AA. In the low-income tract, Civista has a branch with a full-service ATM in Aurora. In moderate-income tracts, Civista has a branch with a full-service ATM and a branch with a cash-only ATM in Lawrenceburg. In middle-income tracts, Civista has two branches with full-service ATMs in Lawrenceburg and West Harrison. Branch offices in this AA represent 12.2% of Civista's total branches. Lastly, Civista also has two stand-alone cash-only ATMs in Lawrenceburg and Moores Hill in middle-income tracts.

The following table illustrates the percentage of branch offices and ATMs in low-, moderate-, and middle-income census tracts in comparison to the number and percentage of census tracts and the percentage of households and businesses in those tracts.

IN Cincinnati MSA

**Geographic Distribution of Branches & ATMS**  
Assessment Area: IN Cincinnati MSA

Tract Category	Branches							ATMs												Demographics			
	Total Branches				Drive-thrus	Extended Hours	Weekend Hours	Total ATMs			Full Service ATMs				Cash only ATMs				Census Tracts		Households	Total Businesses	
	#	%	Open	Closed				#	%	#	#	#	%	Open	Closed	#	%	Open	Closed	#	%	%	%
Low	1	20.0%	0	0	1	1	1	Total	1	14.3%	1	25.0%	0	0	0	0.0%	0	0	1	7.7%	8.6%	10.7%	
DTO	0		0	0	0			SA	0		0		0	0	0		0	0					
Moderate	2	40.0%	0	0	2	1	1	Total	2	28.6%	1	25.0%	0	0	1	33.3%	0	0	2	15.4%	12.4%	20.7%	
DTO	0		0	0	0			SA	0		0		0	0	0		0	0					
Middle	2	40.0%	0	0	2	2	2	Total	4	57.1%	2	50.0%	0	0	2	66.7%	0	0	10	76.9%	79.0%	68.7%	
DTO	0		0	0	0			SA	2		0		0	0	2		0	0					
Upper	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%	
DTO	0		0	0	0			SA	0		0		0	0	0		0	0					
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%	
DTO	0		0	0	0			SA	0		0		0	0	0		0	0					
Total	5	100%	0	0	5	4	4	Total	7	100%	4	100%	0	0	3	100%	0	0	13	100%	100%	100%	
DTO	0		0	0	0			SA	2		0		0	0	2		0	0					

Based on 2023 FFIEC Census Data

Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

Branch distribution in low-income tracts is considered excellent. The distribution of branches at 20.0% exceeded the percentage of low-income tracts (7.7%), households (8.6%), and total businesses (10.7%). Branch distribution in moderate-income tracts is considered excellent. The distribution of branches at 40.0% exceeded the percentage of moderate-income tracts (15.4%), households (12.4%), and total businesses (20.7%) in these tracts.

### Community Development Services

During the evaluation period, 10 employees assisted five organizations totaling 27 hours of community development service to local organizations that provide a multitude of services throughout the AA. This represents 3.1% of total service hours, compared to the total percentage of branches at 12.2%. The hours of service provided in this AA equates to 0.02 ANP. This ranks as Civista's seventh-highest percentage of community development services during the evaluation period. Civista provides a limited level of community development services considering its significant presence in this market.

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

Purpose of CD Service	# Services	# Organizations	# Employees	# Hours
Services to LMI	12	4	9	25
Economic Development	2	1	1	2
<b>Total</b>	<b>14</b>	<b>5</b>	<b>10</b>	<b>27</b>

Employees provided financial expertise through leadership positions in multiple community organizations that provide wraparound services to LMI individuals and families. Community development services include 12 hours serving on boards and committees, 13 hours providing technical expertise, and two hours of financial literacy.

Examples of community development services include:

**Serving on Boards and Committees**

- Three employees serve on boards and committees for a county food pantry that serves LMI individuals and families dealing with food insecurity.
- One employee serves as a board member for a county organization that promotes economic development initiatives.

**Technical Expertise**

- Two employees provided technical expertise to a nonprofit related to fundraising initiatives for scholarships for LMI students.

**Financial Literacy**

- One employee provided financial literacy training (basic concepts around understanding money) for an elementary school in a moderate-income community.



**NONMETROPOLITAN AREA**  
*(Limited-scope Review)*

**DESCRIPTION OF INSTITUTION'S OPERATIONS**

- **Nonmetropolitan Indiana**
  - As of December 31, 2023, Civista operated three branches in the AA, representing 7.3% of its branches.
  - As of December 31, 2023, Civista had \$108.5 million in deposits in this AA, representing a market share of 12.8% and 3.7% of its deposits.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

Using available facts and data, including performance and demographic information, AA performance was evaluated and compared with Civista's overall performance. The conclusions regarding performance are provided in the table below. Please refer to the tables in Appendices E and F for information regarding this area.

AA	Lending Test	Investment Test	Service Test
Nonmetropolitan Indiana	Below	Consistent	Consistent
<i>Performance in the limited-scope AA did not impact to the overall rating.</i>			

For the lending test, Civista received a High Satisfactory rating. Performance in the Nonmetropolitan Indiana is below the overall performance in Indiana. Lending activity is adequate. The borrower distribution is excellent. There are no LMI tracts in the AA, but lending in middle- and upper-income tracts reflects demographic and aggregate comparators. Civista makes a low level of community development loans. This level of performance is primarily due to lending levels relative to Civista's operational presence in the overall AA.

For the investment test, Civista received a Low Satisfactory rating. Performance in Nonmetropolitan Indiana is consistent with overall performance in Indiana. This level of performance is primarily due to comparable levels of qualified investments and contributions relative to Civista's operational presence in the overall AA.

For the service test, Civista received a Low Satisfactory rating. Performance in the Nonmetropolitan Indiana AA is consistent with overall performance in Indiana. The accessibility of delivery systems is accessible to portions of the bank's geographies and individuals of different income levels. Civista provides an adequate level of community development services. This level of performance is primarily due to delivery systems and level of community development services relative to Civista's operational presence in the overall AA.

## APPENDIX A

SCOPE OF EXAMINATION		
<b>TIME PERIOD REVIEWED</b>	<p>HMDA-Reportable Loans: January 1, 2022 – December 31, 2023</p> <p>CRA-Reportable (SB) Loans: January 1, 2022 – December 31, 2023</p> <p>Community Development Activities (loans, qualified investments/donations, and services): June 21, 2022 – August 19, 2024</p>	
<b>FINANCIAL INSTITUTION</b>  <b>Civista / Sandusky, Ohio</b>		<b>PRODUCTS REVIEWED</b>  <b>HMDA / Small Business</b>
<b>AFFILIATE(S)</b>	<b>AFFILIATE RELATIONSHIP</b>	<b>PRODUCTS REVIEWED -</b>
Civista has no nonbank subsidiaries which provide mortgage lending or investment qualified CRA activities on its behalf.		

LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
<ul style="list-style-type: none"> <li>Nonmetropolitan Ohio</li> <li>Toledo, OH MSA</li> <li>Cincinnati OH-KY-IN MSA (aka - Dearborn IN AA)</li> </ul>	Full-scope review Full-scope review Full-scope review	None	None
<ul style="list-style-type: none"> <li>Akron, OH MSA</li> <li>Cleveland-Elyria, OH MSA</li> <li>Columbus, OH MSA</li> <li>Dayton-Kettering, OH MSA</li> <li>Mansfield, OH MSA</li> <li>Nonmetropolitan Indiana</li> </ul>	Limited-scope review Limited-scope review Limited-scope review Limited-scope review Limited-scope review Limited-scope review		

**APPENDIX B**

**SUMMARY OF INSTITUTION & STATE RATINGS**

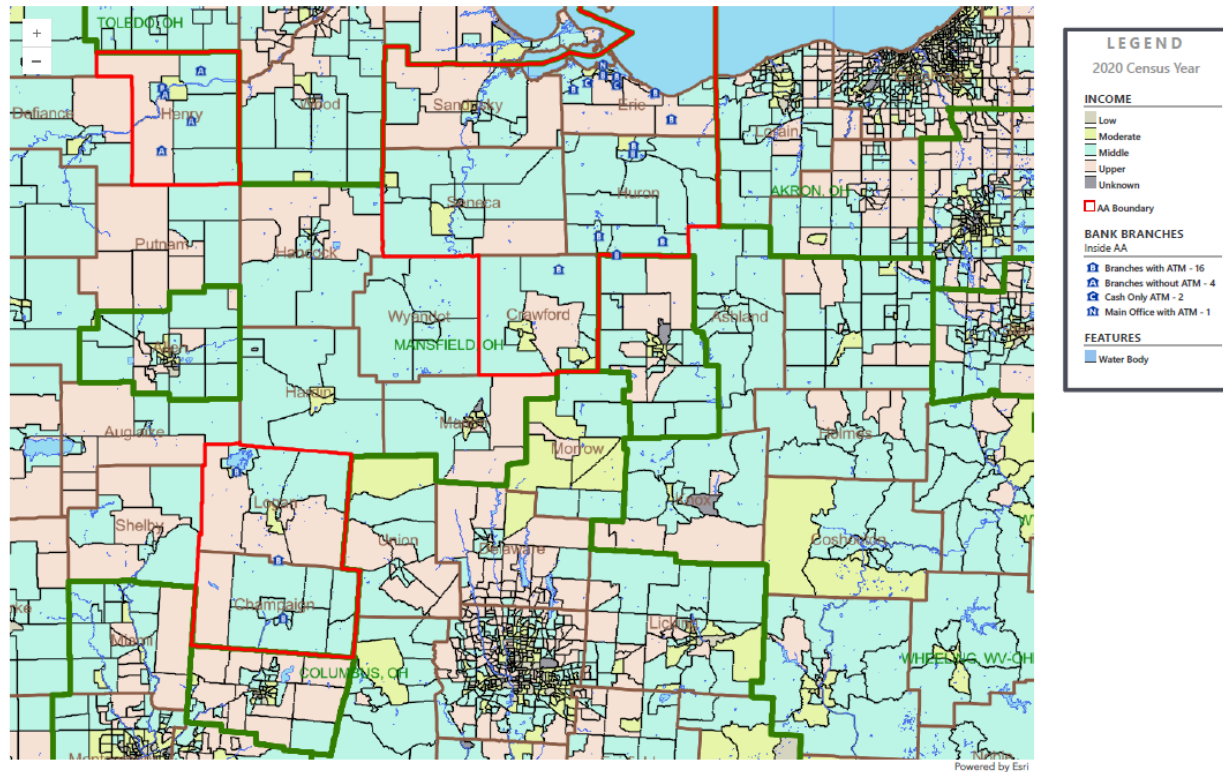
<b>Institution Rating</b>	<b>Lending Test Rating</b>	<b>Investment Test Rating</b>	<b>Service Test Rating</b>	<b>Overall Rating</b>
Institution	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Ohio	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Indiana	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory

## APPENDIX C

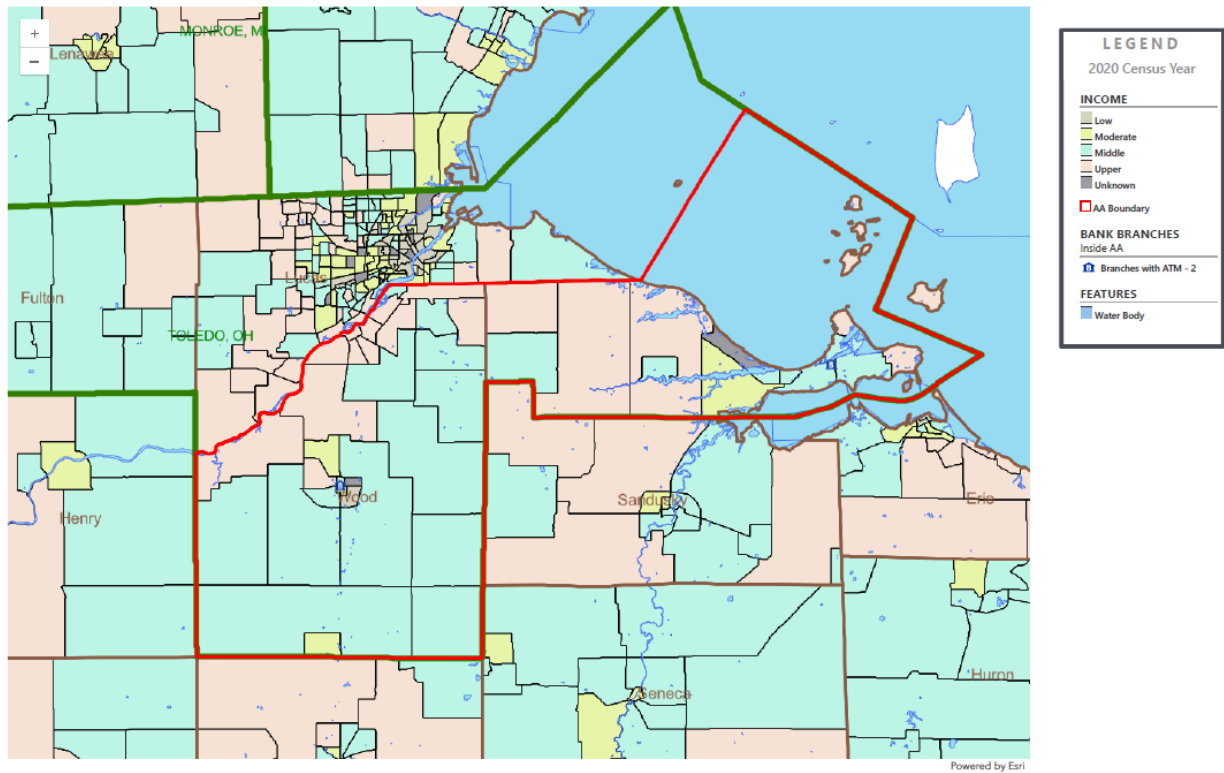
### ASSESSMENT AREA MAPS

#### Full-Scope Assessment Areas

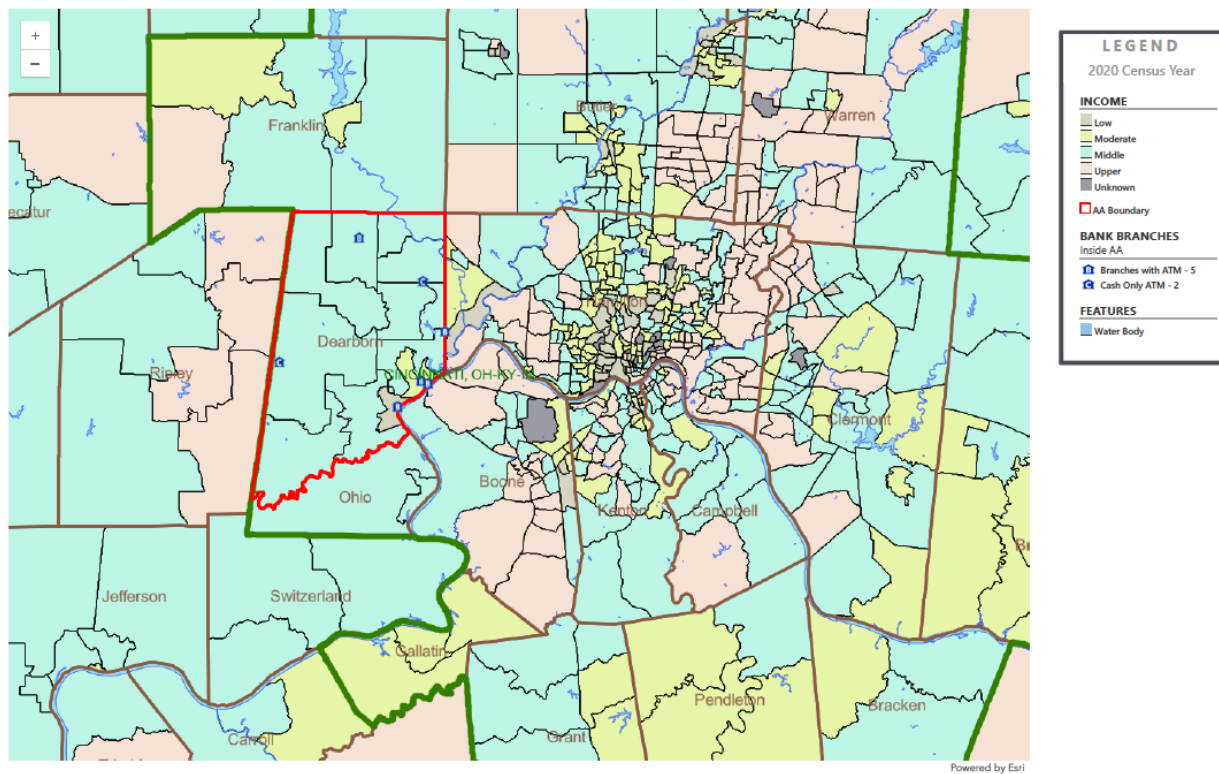
##### 2023 Nonmetropolitan Ohio



2023 OH Toledo MSA

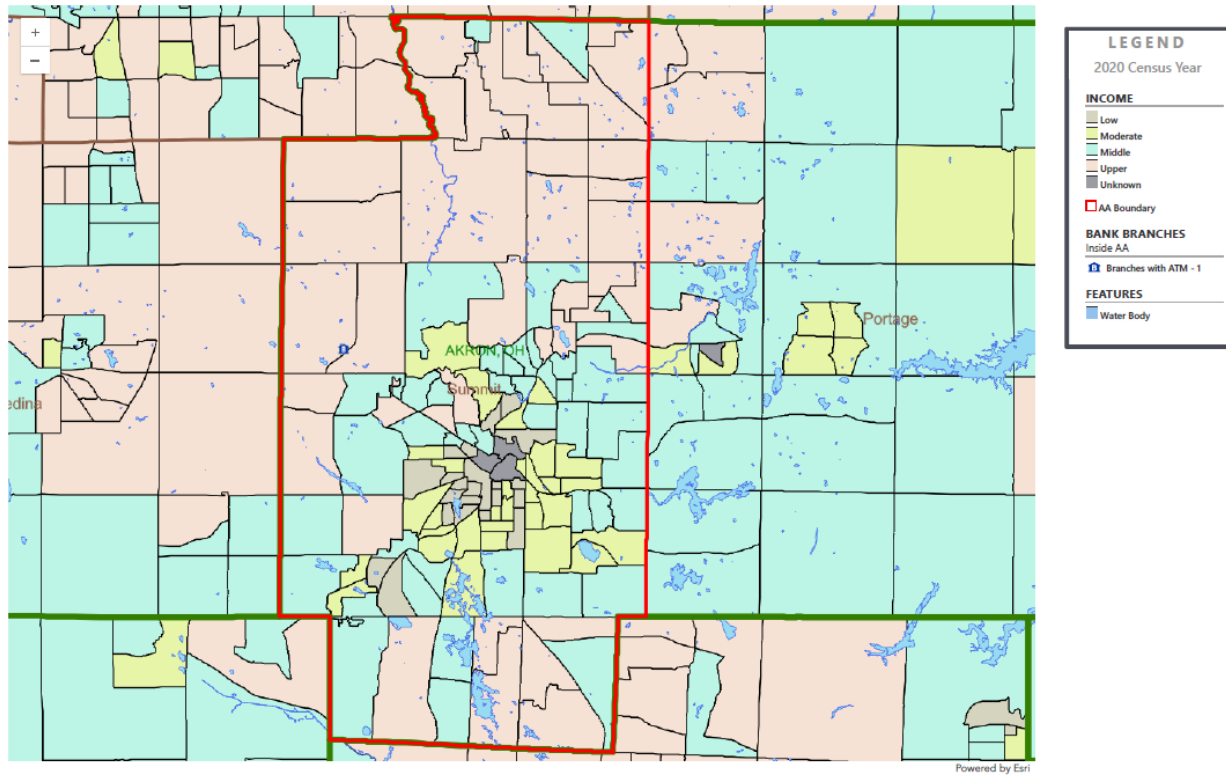


2023 IN Cincinnati MSA (Dearborn AA)

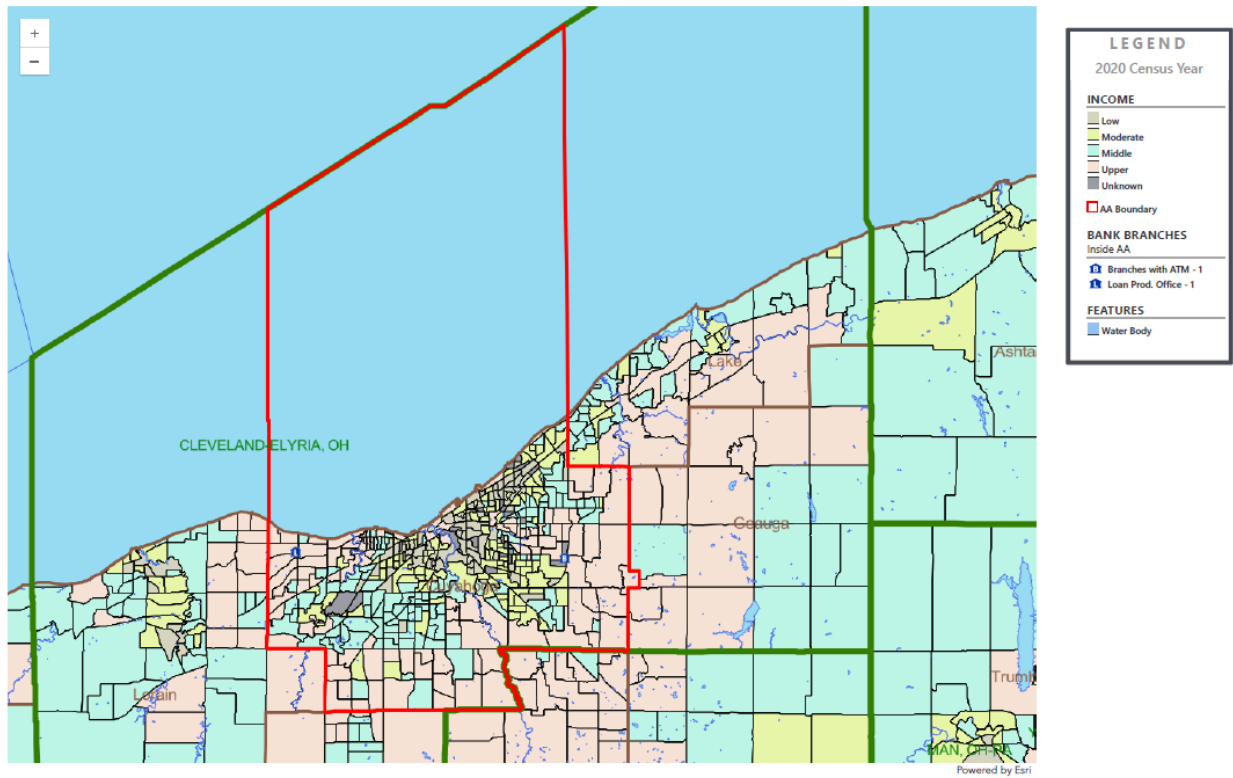


## Limited-Scope Assessment Areas

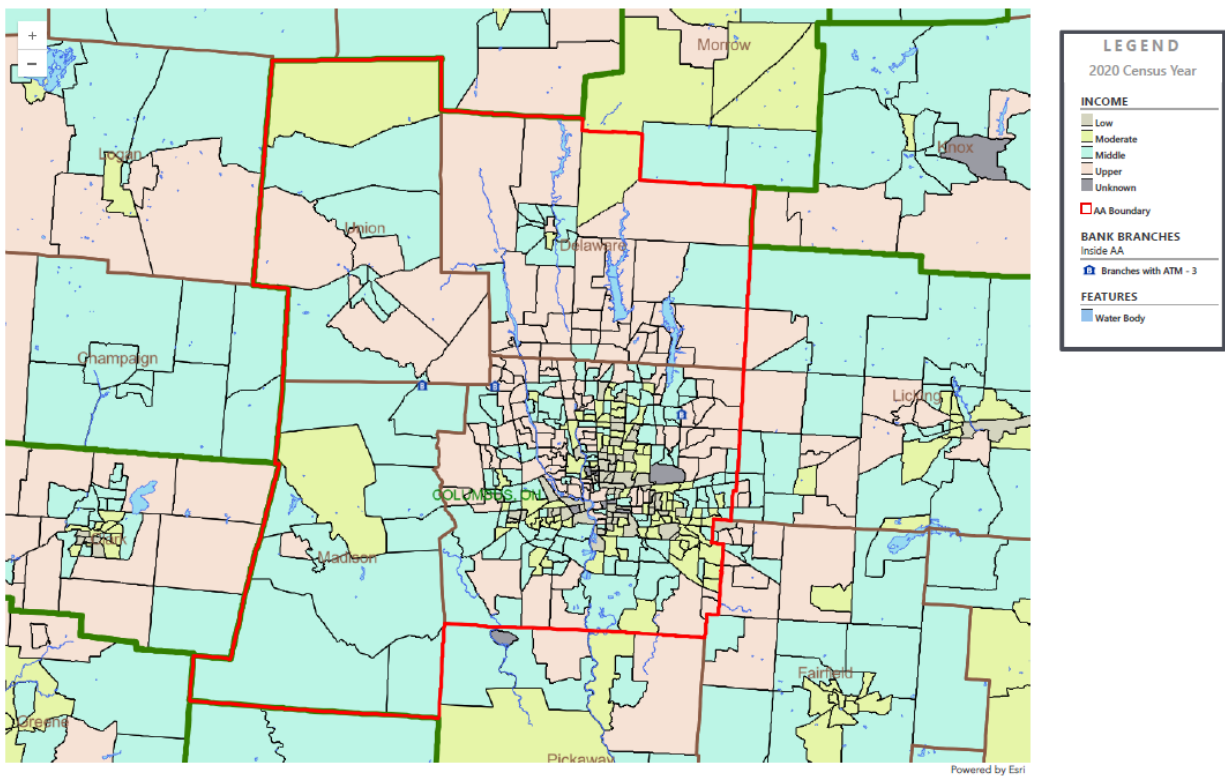
2023 OH Akron MSA



2023 OH Cleveland MSA

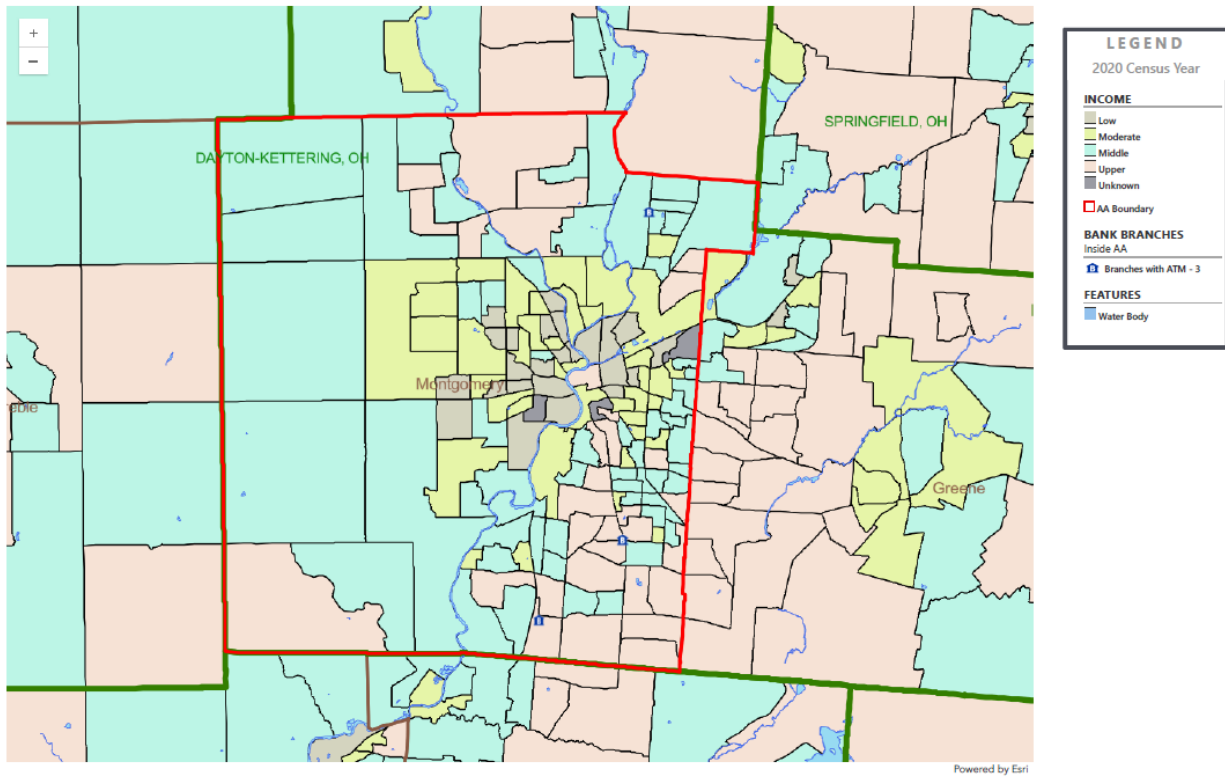


2023 OH Columbus MSA

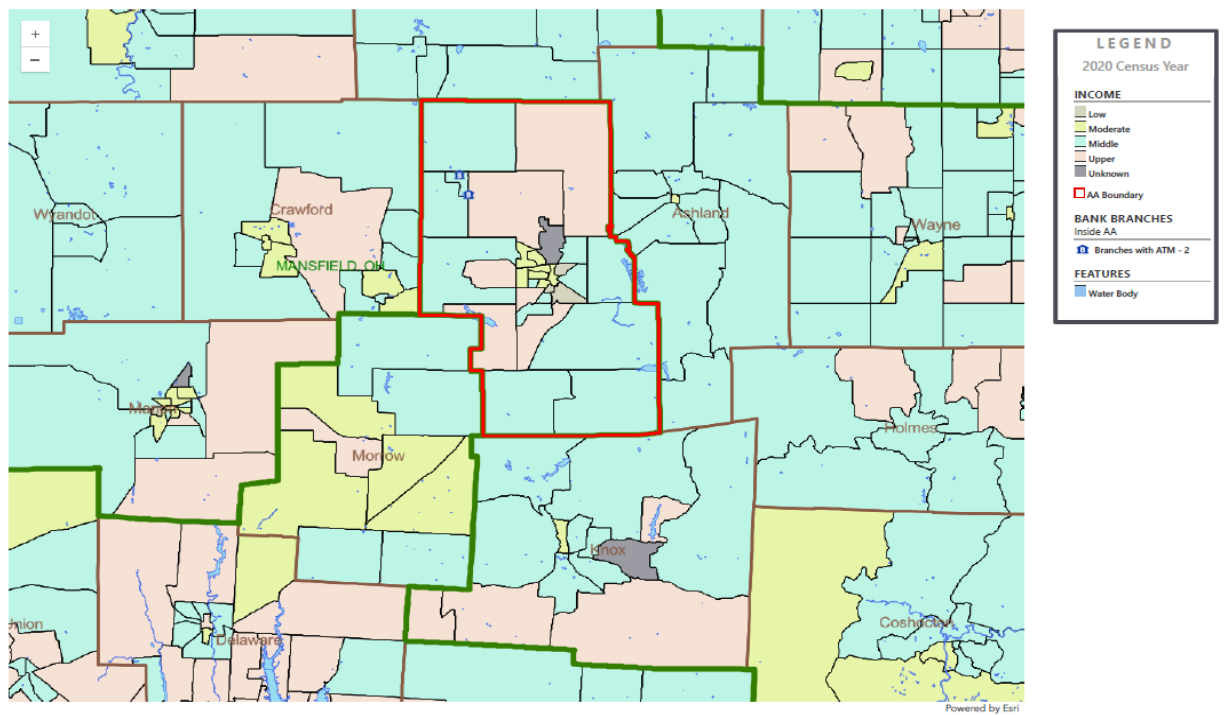




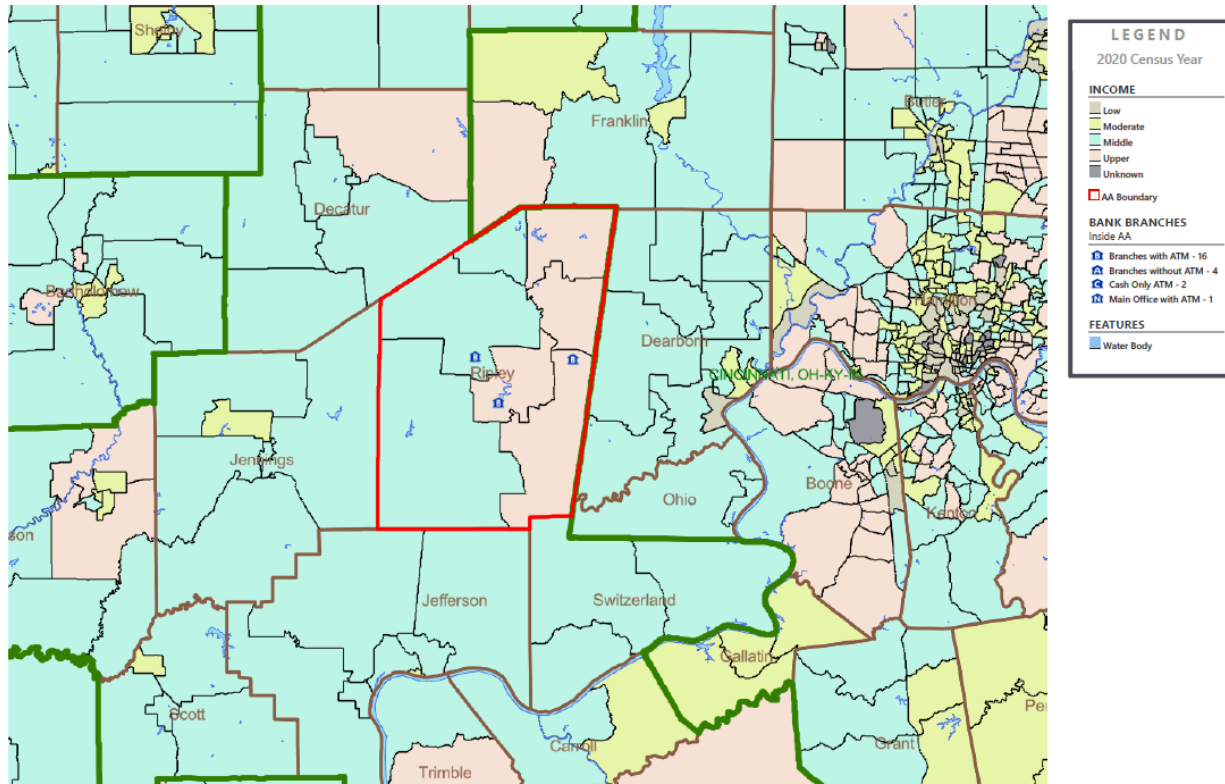
2023 OH Dayton MSA



2023 OH Mansfield MSA



2023 Nonmetropolitan Indiana



## APPENDIX D

### DEMOGRAPHIC INFORMATION

#### Full-Scope Assessment Areas

#### 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	1	1.0%	571	0.5%	196	34.3%	18,233	17.0%
Moderate-income	18	17.5%	15,055	14.0%	2,432	16.2%	20,305	18.9%
Middle-income	63	61.2%	65,275	60.9%	5,081	7.8%	25,128	23.4%
Upper-income	20	19.4%	26,269	24.5%	1,197	4.6%	43,504	40.6%
Unknown-income	1	1.0%	0	0.0%	0	0.0%	0	0.0%
Total	103	100.0%	107,170	100.0%	8,906	8.3%	107,170	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	1,381	533	0.5%	38.6%	632	45.8%	216	15.6%
Moderate-income	31,208	15,198	12.9%	48.7%	11,963	38.3%	4,047	13.0%
Middle-income	111,106	70,941	60.2%	63.8%	25,903	23.3%	14,262	12.8%
Upper-income	42,423	31,235	26.5%	73.6%	6,556	15.5%	4,632	10.9%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total	186,118	117,907	100.0%	63.4%	45,054	24.2%	23,157	12.4%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	132	0.9%	123	1.0%	8	0.7%	1	0.4%
Moderate-income	2,353	16.7%	2,067	16.3%	263	22.3%	23	8.6%
Middle-income	8,236	58.3%	7,440	58.7%	637	54.1%	159	59.6%
Upper-income	3,405	24.1%	3,052	24.1%	269	22.9%	84	31.5%
Unknown-income	1	0.0%	1	0.0%	0	0.0%	0	0.0%
Total	14,127	100.0%	12,683	100.0%	1,177	100.0%	267	100.0%
	Percentage of Total Businesses:			89.8%		8.3%		1.9%
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	2	0.2%	2	0.2%	0	0.0%	0	0.0%
Moderate-income	42	3.5%	40	3.4%	2	11.8%	0	0.0%
Middle-income	764	64.5%	750	64.5%	10	58.8%	4	100.0%
Upper-income	376	31.8%	371	31.9%	5	29.4%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1,184	100.0%	1,163	100.0%	17	100.0%	4	100.0%
	Percentage of Total Farms:			98.2%		1.4%		0.3%

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

### Combined Demographics Report

Assessment Area: OH Toledo MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	2.2%	588	1.4%	189	32.1%	6,454	15.4%
Moderate-income	4	8.7%	2,598	6.2%	471	18.1%	6,596	15.7%
Middle-income	21	45.7%	18,043	42.9%	1,353	7.5%	8,495	20.2%
Upper-income	18	39.1%	20,674	49.2%	607	2.9%	20,489	48.7%
Unknown-income	2	4.3%	131	0.3%	12	9.2%	0	0.0%
Total	46	100.0%	42,034	100.0%	2,632	6.3%	42,034	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	2,476	103	0.2%	4.2%	2,222	89.7%	151	6.1%
Moderate-income	6,823	2,686	5.7%	39.4%	3,486	51.1%	651	9.5%
Middle-income	34,687	21,612	45.5%	62.3%	7,751	22.3%	5,324	15.3%
Upper-income	37,571	22,874	48.2%	60.9%	7,755	20.6%	6,942	18.5%
Unknown-income	1,077	192	0.4%	17.8%	204	18.9%	681	63.2%
Total	82,634	47,467	100.0%	57.4%	21,418	25.9%	13,749	16.6%
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	143	2.2%	133	2.3%	10	1.7%	0	0.0%
Moderate-income	464	7.2%	409	7.1%	46	7.6%	9	7.9%
Middle-income	2,551	39.6%	2,248	39.3%	247	40.9%	56	49.1%
Upper-income	3,207	49.8%	2,872	50.2%	287	47.5%	48	42.1%
Unknown-income	75	1.2%	60	1.0%	14	2.3%	1	0.9%
Total	6,440	100.0%	5,722	100.0%	604	100.0%	114	100.0%
	Percentage of Total Businesses:			88.9%		9.4%		1.8%
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	2	0.7%	2	0.8%	0	0.0%	0	0.0%
Moderate-income	7	2.6%	7	2.6%	0	0.0%	0	0.0%
Middle-income	156	57.8%	154	58.1%	2	40.0%	0	0.0%
Upper-income	105	38.9%	102	38.5%	3	60.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	270	100.0%	265	100.0%	5	100.0%	0	0.0%
	Percentage of Total Farms:			98.1%		1.9%		0.0%

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

**Combined Demographics Report**

**Assessment Area: IN Cincinnati MSA**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	7.7%	942	6.8%	136	14.4%	2,750	19.8%
Moderate-income	2	15.4%	1,262	9.1%	176	13.9%	2,519	18.2%
Middle-income	10	76.9%	11,673	84.1%	346	3.0%	3,648	26.3%
Upper-income	0	0.0%	0	0.0%	0	0.0%	4,960	35.7%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	13	100.0%	13,877	100.0%	658	4.7%	13,877	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	1,794	899	5.7%	50.1%	757	42.2%	138	7.7%
Moderate-income	2,613	1,267	8.1%	48.5%	1,128	43.2%	218	8.3%
Middle-income	16,189	13,518	86.2%	83.5%	1,710	10.6%	961	5.9%
Upper-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total	20,596	15,684	100.0%	76.2%	3,595	17.5%	1,317	6.4%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	211	10.7%	202	10.9%	8	7.8%	1	4.0%
Moderate-income	410	20.7%	365	19.7%	39	38.2%	6	24.0%
Middle-income	1,360	68.7%	1,287	69.4%	55	53.9%	18	72.0%
Upper-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1,981	100.0%	1,854	100.0%	102	100.0%	25	100.0%
Percentage of Total			93.6%		5.1%		1.3%	
	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	2	2.4%	2	2.5%	0	0.0%	0	0.0%
Middle-income	80	97.6%	79	97.5%	1	100.0%	0	0.0%
Upper-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	82	100.0%	81	100.0%	1	100.0%	0	0.0%
Percentage of Total Farms:			98.8%		1.2%		0.0%	

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

# APPENDIX E

## LENDING TABLES - Full-Scope Assessment Areas

### HMDA Lending Tables

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		Dollar		Families by Family Income	Count		Dollar			Count		Dollar				
		Count							Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg		
		#	%	\$(000s)	\$%	%	#	%	%	\$(000s)	\$%	\$%	#	%	%	\$(000s)	\$%	\$%
HOME PURCHASE	Low	67	15.6%	6,900	9.8%	17.0%	38	15.6%	9.5%	3,859	10.5%	5.5%	29	15.7%	8.3%	3,041	9.0%	4.6%
	Moderate	97	22.6%	10,901	15.5%	18.9%	59	24.2%	23.9%	6,720	18.3%	18.3%	38	20.5%	26.0%	4,181	12.4%	19.0%
	Middle	88	20.5%	12,695	18.1%	23.4%	56	23.0%	22.4%	8,628	23.5%	21.7%	32	17.3%	23.6%	4,067	12.1%	22.4%
	Upper	147	34.3%	36,156	51.4%	40.6%	75	30.7%	25.3%	15,648	42.7%	36.8%	72	38.9%	25.8%	20,508	60.9%	37.7%
	Unknown	30	7.0%	3,645	5.2%	0.0%	16	6.6%	18.9%	1,782	4.9%	17.8%	14	7.6%	16.3%	1,863	5.5%	16.3%
	Total	429	100%	70,297	100%	100.0%	244	100%	100%	36,637	100%	100%	185	100%	100%	33,660	100%	100%
REFINANCE	Low	26	11.0%	1,629	5.7%	17.0%	14	9.2%	10.6%	911	4.9%	6.5%	12	14.1%	11.2%	718	7.4%	7.0%
	Moderate	41	17.3%	3,249	11.5%	18.9%	28	18.4%	24.3%	2,211	11.9%	19.0%	13	15.3%	22.9%	1,038	10.7%	18.1%
	Middle	61	25.7%	6,445	22.7%	23.4%	41	27.0%	27.9%	4,202	22.6%	27.7%	20	23.5%	25.3%	2,243	23.1%	25.0%
	Upper	90	38.0%	14,921	52.7%	40.6%	54	35.5%	28.8%	9,652	51.9%	37.0%	36	42.4%	31.8%	5,269	54.2%	37.6%
	Unknown	19	8.0%	2,091	7.4%	0.0%	15	9.9%	8.4%	1,636	8.8%	9.7%	4	4.7%	8.8%	455	4.7%	12.3%
	Total	237	100%	28,335	100%	100.0%	152	100%	100%	18,612	100%	100%	85	100%	100%	9,723	100%	100%
HOME IMPROVEMENT	Low	7	7.1%	163	2.0%	17.0%	1	11.1%	9.2%	31	1.7%	6.2%	6	6.7%	8.6%	132	2.1%	6.0%
	Moderate	22	22.2%	712	8.7%	18.9%	2	22.2%	21.3%	41	2.3%	15.6%	20	22.2%	23.3%	671	10.6%	16.7%
	Middle	28	28.3%	1,733	21.2%	23.4%	2	22.2%	25.5%	100	5.5%	22.0%	26	28.9%	25.2%	1,633	25.7%	22.9%
	Upper	37	37.4%	5,241	64.1%	40.6%	4	44.4%	41.4%	1,641	90.5%	53.4%	33	36.7%	39.8%	3,600	56.6%	52.0%
	Unknown	5	5.1%	321	3.9%	0.0%	0	0.0%	2.5%	0	0.0%	2.8%	5	5.6%	3.1%	321	5.0%	2.3%
	Total	99	100%	8,170	100%	100.0%	9	100%	100%	1,813	100%	100%	90	100%	100%	6,357	100%	100%
MULTI FAMILY	Low	0	0.0%	0	0.0%	17.0%	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%	18.9%	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%	23.4%	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%	40.6%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	11	100.0%	6,249	100.0%	0.0%	7	100.0%	100.0%	5,139	100.0%	100.0%	4	100.0%	100.0%	1,110	100.0%	100.0%
	Total	11	100%	6,249	100%	100.0%	7	100%	100%	5,139	100%	100%	4	100%	100%	1,110	100%	100%
OTHER PURPOSE LOC	Low	23	9.0%	1,385	6.2%	17.0%	16	8.5%	10.7%	1,177	7.2%	6.6%	7	10.4%	8.3%	208	3.5%	7.4%
	Moderate	62	24.2%	3,264	14.7%	18.9%	40	21.2%	18.0%	2,283	14.0%	13.4%	22	32.8%	25.0%	981	16.5%	18.0%
	Middle	63	24.6%	3,657	16.4%	23.4%	50	26.5%	28.8%	2,793	17.2%	24.5%	13	19.4%	26.2%	864	14.5%	24.0%
	Upper	89	34.8%	10,353	46.5%	40.6%	70	37.0%	38.5%	7,170	44.0%	48.5%	19	28.4%	36.3%	3,183	53.4%	46.4%
	Unknown	19	7.4%	3,586	16.1%	0.0%	13	6.9%	3.9%	2,861	17.6%	7.0%	6	9.0%	4.2%	725	12.2%	4.3%
	Total	256	100%	22,245	100%	100.0%	189	100%	100%	16,284	100%	100%	67	100%	100%	5,961	100%	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					
		Count		Dollar		Families by Family Income	Count		Dollar			Count		Dollar			Families by Family Income	Agg
		#	%	\$(000s)	\$%		#	%	\$(000s)	\$%	\$%	#	%	\$(000s)	\$%	\$%		
OTHER PURPOSE CLOSED/EXEMPT	Low	1	50.0%	94	30.4%	17.0%	1	50.0%	11.1%	94	30.4%	6.7%	0	0.0%	16.5%	0	0.0%	10.6%
	Moderate	0	0.0%	0	0.0%	18.9%	0	0.0%	21.1%	0	0.0%	12.9%	0	0.0%	21.0%	0	0.0%	16.3%
	Middle	1	50.0%	215	69.6%	23.4%	1	50.0%	28.3%	215	69.6%	25.0%	0	0.0%	32.4%	0	0.0%	34.0%
	Upper	0	0.0%	0	0.0%	40.6%	0	0.0%	32.2%	0	0.0%	42.5%	0	0.0%	27.8%	0	0.0%	36.9%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	7.2%	0	0.0%	12.9%	0	0.0%	2.3%	0	0.0%	2.2%
	Total	2	100%	309	100%	100.0%	2	100%	100%	309	100%	100%	0	0.0%	100%	0	0.0%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	17.0%	0	0.0%	3.3%	0	0.0%	2.7%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	18.9%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	2.9%	0	0.0%	1.7%
	Middle	0	0.0%	0	0.0%	23.4%	0	0.0%	0.8%	0	0.0%	0.5%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	40.6%	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%	95.8%	0	0.0%	96.8%	0	0.0%	97.1%	0	0.0%	98.3%
	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%
HMDA TOTALS	Low	124	12.0%	10,171	7.5%	17.0%	70	11.6%	9.8%	6,072	7.7%	5.5%	54	12.5%	9.1%	4,099	7.2%	5.1%
	Moderate	222	21.5%	18,126	13.4%	18.9%	129	21.4%	23.0%	11,255	14.3%	17.2%	93	21.6%	24.7%	6,871	12.1%	18.1%
	Middle	241	23.3%	24,745	18.2%	23.4%	150	24.9%	24.4%	15,938	20.2%	22.2%	91	21.1%	24.3%	8,807	15.5%	22.3%
	Upper	363	35.1%	66,671	49.2%	40.6%	203	33.7%	28.1%	34,111	43.3%	35.9%	160	37.1%	28.8%	32,560	57.3%	37.3%
	Unknown	84	8.1%	15,892	11.7%	0.0%	51	8.5%	14.6%	11,418	14.5%	19.2%	33	7.7%	13.2%	4,474	7.9%	17.2%
	Total	1,034	100%	135,605	100%	100.0%	603	100%	100%	78,794	100%	100%	431	100%	100%	56,811	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	23	5.4%	2,633	3.7%	0.5%	11	4.5%	0.6%	1,323	3.6%	0.4%	12	6.5%	0.7%	1,310	3.9%	0.4%
	Moderate	85	19.8%	10,664	15.2%	12.9%	47	19.3%	15.5%	5,551	15.2%	11.3%	38	20.5%	16.1%	5,113	15.2%	12.0%
	Middle	206	48.0%	30,728	43.7%	60.2%	127	52.0%	61.1%	16,781	45.8%	59.9%	79	42.7%	59.2%	13,947	41.4%	59.3%
	Upper	115	26.8%	26,272	37.4%	26.5%	59	24.2%	22.7%	12,982	35.4%	28.3%	56	30.3%	24.0%	13,290	39.5%	28.3%
	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	429	100%	70,297	100%	100.0%	244	100%	100%	36,637	100%	100%	185	100%	100%	33,660	100%	100%
REFINANCE	Low	7	3.0%	586	2.1%	0.5%	4	2.6%	0.6%	223	1.2%	0.6%	3	3.5%	0.4%	363	3.7%	0.8%
	Moderate	34	14.3%	2,926	10.3%	12.9%	22	14.5%	11.8%	2,025	10.9%	8.7%	12	14.1%	10.6%	901	9.3%	8.3%
	Middle	116	48.9%	13,826	48.8%	60.2%	76	50.0%	58.5%	8,736	46.9%	56.9%	40	47.1%	59.7%	5,090	52.4%	59.0%
	Upper	80	33.8%	10,997	38.8%	26.5%	50	32.9%	29.0%	7,628	41.0%	33.9%	30	35.3%	29.4%	3,369	34.6%	31.9%
	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	237	100%	28,335	100%	100.0%	152	100%	100%	18,612	100%	100%	85	100%	100%	9,723	100%	100%
HOME IMPROVEMENT	Low	2	2.0%	76	0.9%	0.5%	0	0.0%	0.1%	0	0.0%	0.1%	2	2.2%	0.4%	76	1.2%	0.5%
	Moderate	10	10.1%	294	3.6%	12.9%	1	11.1%	11.0%	25	1.4%	8.2%	9	10.0%	10.5%	269	4.2%	6.7%
	Middle	49	49.5%	2,973	36.4%	60.2%	4	44.4%	60.2%	472	26.0%	58.9%	45	50.0%	61.4%	2,501	39.3%	60.6%
	Upper	38	38.4%	4,827	59.1%	26.5%	4	44.4%	28.7%	1,316	72.6%	32.7%	34	37.8%	27.7%	3,511	55.2%	32.2%
	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	0.0%	0.0%
	Total	99	100%	8,170	100%	100.0%	9	100%	100%	1,813	100%	100%	90	100%	100%	6,357	100%	100%
MULTI FAMILY	Multi-Family Units																	
	Low	1	9.1%	192	3.1%	1.2%	0	0.0%	6.0%	0	0.0%	1.3%	1	25.0%	10.5%	192	17.3%	3.0%
	Moderate	6	54.5%	3,147	50.4%	28.0%	3	42.9%	20.0%	2,229	43.4%	17.1%	3	75.0%	18.4%	918	82.7%	6.5%
	Middle	2	18.2%	750	12.0%	57.9%	2	28.6%	58.0%	750	14.6%	71.3%	0	0.0%	63.2%	0	0.0%	82.8%
	Upper	2	18.2%	2,160	34.6%	13.0%	2	28.6%	16.0%	2,160	42.0%	10.3%	0	0.0%	7.9%	0	0.0%	7.8%
	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	11	100%	6,249	100%	100.0%	7	100%	100%	5,139	100%	100%	4	100%	100%	1,110	100%	100%	
OTHER PURPOSE LOC	Low	2	0.8%	160	0.7%	0.5%	2	1.1%	0.7%	160	1.0%	0.7%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	30	11.7%	1,105	5.0%	12.9%	22	11.6%	11.1%	915	5.6%	7.6%	8	11.9%	11.8%	190	3.2%	7.6%
	Middle	123	48.0%	9,907	44.5%	60.2%	89	47.1%	58.0%	6,707	41.2%	54.8%	34	50.7%	59.3%	3,200	53.7%	56.8%
	Upper	101	39.5%	11,073	49.8%	26.5%	76	40.2%	30.2%	8,502	52.2%	36.9%	25	37.3%	28.9%	2,571	43.1%	35.6%
	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	256	100%	22,245	100%	100.0%	189	100%	100%	16,284	100%	100%	67	100%	100%	5,961	100%	100%

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%	0.5%	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%	12.9%	0	0.0%	13.9%	0	0.0%	9.9%	0	0.0%	14.8%	0	0.0%	12.3%
	Middle	1	50.0%	215	69.6%	60.2%	1	50.0%	58.9%	215	69.6%	51.9%	0	0.0%	59.7%	0	0.0%	63.2%
	Upper	1	50.0%	94	30.4%	26.5%	1	50.0%	27.2%	94	30.4%	38.2%	0	0.0%	25.6%	0	0.0%	24.5%
	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	2	100%	309	100%	100.0%	2	100%	100%	309	100%	100%	0	0.0%	100%	0	0.0%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	0.5%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	5.7%	0	0.0%	6.4%
	Moderate	0	0.0%	0	0.0%	12.9%	0	0.0%	22.5%	0	0.0%	17.9%	0	0.0%	17.1%	0	0.0%	9.8%
	Middle	0	0.0%	0	0.0%	60.2%	0	0.0%	61.7%	0	0.0%	63.9%	0	0.0%	54.3%	0	0.0%	60.3%
	Upper	0	0.0%	0	0.0%	26.5%	0	0.0%	15.8%	0	0.0%	18.3%	0	0.0%	22.9%	0	0.0%	23.6%
	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	35	3.4%	3,647	2.7%	0.5%	17	2.8%	0.6%	1,706	2.2%	0.5%	18	4.2%	0.6%	1,941	3.4%	0.6%
	Moderate	165	16.0%	18,136	13.4%	12.9%	95	15.8%	13.9%	10,745	13.6%	10.7%	70	16.2%	14.1%	7,391	13.0%	10.8%
	Middle	497	48.1%	58,399	43.1%	60.2%	299	49.6%	60.0%	33,661	42.7%	59.4%	198	45.9%	59.5%	24,738	43.5%	60.0%
	Upper	337	32.6%	55,423	40.9%	26.5%	192	31.8%	25.5%	32,682	41.5%	29.4%	145	33.6%	25.8%	22,741	40.0%	28.6%
	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	1,034	100%	135,605	100%	100.0%	603	100%	100%	79,794	100%	100%	431	100%	100%	56,811	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: OH Toledo MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022						2023					
		Bank		Dollar		Families by Family Income	Count		Dollar				Count		Dollar			
		#	%	\$(000s)	\$%		#	%	\$(000s)	\$%			#	%	\$(000s)	\$%		
HOME PURCHASE	Low	3	5.4%	373	2.3%	15.4%	2	6.3%	5.1%	264	3.2%	2.3%	1	4.2%	6.6%	109	1.4%	3.0%
	Moderate	6	10.7%	1,042	6.4%	15.7%	3	9.4%	18.5%	402	4.8%	12.0%	3	12.5%	17.8%	640	8.0%	10.9%
	Middle	11	19.6%	2,480	15.2%	20.2%	5	15.6%	21.1%	1,203	14.5%	17.5%	6	25.0%	24.0%	1,277	16.0%	21.0%
	Upper	26	46.4%	10,663	65.5%	48.7%	13	40.6%	43.9%	4,832	58.2%	57.6%	13	54.2%	40.2%	5,831	73.1%	53.9%
	Unknown	10	17.9%	1,720	10.6%	0.0%	9	28.1%	11.4%	1,600	19.3%	10.5%	1	4.2%	11.4%	120	1.5%	11.2%
	Total	56	100%	16,278	100%	100.0%	32	100%	100%	8,301	100%	100%	24	100%	100%	7,977	100%	100%
REFINANCE	Low	1	4.5%	165	3.5%	15.4%	1	5.6%	8.9%	165	3.8%	4.9%	0	0.0%	11.9%	0	0.0%	7.7%
	Moderate	0	0.0%	0	0.0%	15.7%	0	0.0%	21.4%	0	0.0%	15.6%	0	0.0%	24.0%	0	0.0%	19.1%
	Middle	2	9.1%	320	6.8%	20.2%	2	11.1%	25.5%	320	7.4%	22.7%	0	0.0%	25.1%	0	0.0%	24.3%
	Upper	14	63.6%	3,717	78.6%	48.7%	12	66.7%	37.4%	3,556	81.7%	47.5%	2	50.0%	33.0%	161	42.5%	41.5%
	Unknown	5	22.7%	530	11.2%	0.0%	3	16.7%	6.8%	312	7.2%	9.3%	2	50.0%	6.0%	218	57.5%	7.5%
	Total	22	100%	4,732	100%	100.0%	18	100%	100%	4,353	100%	100%	4	100%	100%	379	100%	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	15.4%	0	0.0%	5.5%	0	0.0%	3.2%	0	0.0%	9.0%	0	0.0%	5.6%
	Moderate	0	0.0%	0	0.0%	15.7%	0	0.0%	15.7%	0	0.0%	12.6%	0	0.0%	19.4%	0	0.0%	14.4%
	Middle	3	60.0%	225	33.1%	20.2%	0	0.0%	24.9%	0	0.0%	19.1%	3	75.0%	27.1%	225	66.4%	23.6%
	Upper	1	20.0%	340	50.1%	48.7%	1	100.0%	51.6%	340	100.0%	61.6%	0	0.0%	42.1%	0	0.0%	51.0%
	Unknown	1	20.0%	114	16.8%	0.0%	0	0.0%	2.3%	0	0.0%	3.5%	1	25.0%	2.5%	114	33.6%	5.3%
	Total	5	100%	679	100%	100.0%	1	100%	100%	340	100%	100%	4	100%	100%	339	100%	100%
MULTI FAMILY	Low	0	0.0%	0	0.0%	15.4%	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%	15.7%	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%	20.2%	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%	48.7%	0	0.0%	3.6%	0	0.0%	0.2%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	4	100.0%	4,501	100.0%	0.0%	4	100.0%	96.4%	4,501	100.0%	99.8%	0	0.0%	100.0%	0	0.0%	100.0%
	Total	4	100%	4,501	100%	100.0%	4	100%	100%	4,501	100%	100%	0	0.0%	100%	0	0.0%	100%
OTHER PURPOSE LOC	Low	1	5.6%	50	2.9%	15.4%	1	7.7%	8.4%	50	5.6%	4.2%	0	0.0%	12.9%	0	0.0%	7.5%
	Moderate	3	16.7%	140	8.2%	15.7%	3	23.1%	13.0%	140	15.6%	7.5%	0	0.0%	21.4%	0	0.0%	14.6%
	Middle	2	11.1%	53	3.1%	20.2%	2	15.4%	22.3%	53	5.9%	18.3%	0	0.0%	25.7%	0	0.0%	24.9%
	Upper	10	55.6%	1,303	76.6%	48.7%	6	46.2%	53.0%	550	61.2%	61.3%	4	80.0%	38.6%	753	93.8%	51.8%
	Unknown	2	11.1%	156	9.2%	0.0%	1	7.7%	3.3%	106	11.8%	8.7%	1	20.0%	1.4%	50	6.2%	1.2%
	Total	18	100%	1,702	100%	100.0%	13	100%	100%	839	100%	100%	5	100%	100%	803	100%	100%

Originations &amp; Purchases

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

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

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022						2023					
		Bank		Dollar		Families by Family Income	Count		Dollar				Count		Dollar			
		#	%	\$(000s)	\$%		#	%	\$(000s)	\$%			#	%	\$(000s)	\$%		
OTHER PURPOSE CLOSED/EXEMPT	Low	1	50.0%	70	34.1%	15.4%	1	50.0%	9.4%	70	34.1%	5.5%	0	0.0%	12.6%	0	0.0%	7.5%
	Moderate	1	50.0%	135	65.9%	15.7%	1	50.0%	21.1%	135	65.9%	12.9%	0	0.0%	20.3%	0	0.0%	15.3%
	Middle	0	0.0%	0	0.0%	20.2%	0	0.0%	20.3%	0	0.0%	17.9%	0	0.0%	25.2%	0	0.0%	14.2%
	Upper	0	0.0%	0	0.0%	48.7%	0	0.0%	43.0%	0	0.0%	56.6%	0	0.0%	39.2%	0	0.0%	57.5%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	6.3%	0	0.0%	7.1%	0	0.0%	2.8%	0	0.0%	5.5%
	Total	2	100%	205	100%	100.0%	2	100%	100%	205	100%	100%	0	0.0%	100%	0	0.0%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	15.4%	0	0.0%	4.0%	0	0.0%	0.3%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	15.7%	0	0.0%	4.0%	0	0.0%	6.7%	0	0.0%	8.3%	0	0.0%	2.5%
	Middle	0	0.0%	0	0.0%	20.2%	0	0.0%	4.0%	0	0.0%	6.2%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	48.7%	0	0.0%	4.0%	0	0.0%	6.1%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	84.0%	0	0.0%	80.7%	0	0.0%	91.7%	0	0.0%	97.5%
	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%
HMDA TOTALS	Low	6	5.6%	658	2.3%	15.4%	5	7.1%	6.6%	549	3.0%	2.7%	1	2.7%	8.6%	109	1.1%	4.0%
	Moderate	10	9.3%	1,317	4.7%	15.7%	7	10.0%	18.5%	677	3.6%	10.9%	3	8.1%	19.6%	640	6.7%	12.2%
	Middle	18	16.8%	3,078	11.0%	20.2%	9	12.9%	22.7%	1,576	8.5%	16.1%	9	24.3%	24.7%	1,502	15.8%	20.9%
	Upper	51	47.7%	16,023	57.0%	48.7%	32	45.7%	43.1%	9,278	49.9%	46.8%	19	51.4%	38.5%	6,745	71.0%	49.8%
	Unknown	22	20.6%	7,021	25.0%	0.0%	17	24.3%	9.1%	6,519	35.1%	23.5%	5	13.5%	8.6%	502	5.3%	13.1%
	Total	107	100%	28,097	100%	100.0%	70	100%	100%	18,539	100%	100%	37	100%	100%	9,498	100%	100%

Originations &amp; Purchases

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

Geographic Distribution of HMDA Loans - Table 1 of 2  
Assessment Area: OH Toledo 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				Bank	Agg		Bank	Agg		Bank	Agg		Bank	Agg	
#	%	\$ (000s)	\$%	%	#	%	%	\$ (000s)	\$%	\$%	#	%	%	\$ (000s)	\$%	\$%		
HOME PURCHASE	Low	2	3.6%	530	3.3%	0.2%	2	6.3%	0.7%	530	6.4%	0.6%	0	0.0%	0.2%	0	0.0%	0.2%
	Moderate	7	12.5%	954	5.9%	5.7%	5	15.6%	5.5%	678	8.2%	4.0%	2	8.3%	5.3%	276	3.5%	3.6%
	Middle	25	44.6%	5,940	36.5%	45.5%	17	53.1%	39.1%	3,695	44.5%	33.1%	8	33.3%	38.2%	2,245	28.1%	31.6%
	Upper	22	39.3%	8,854	54.4%	48.2%	8	25.0%	53.7%	3,398	40.9%	61.5%	14	58.3%	55.5%	5,456	68.4%	63.8%
	Unknown	0	0.0%	0	0.0%	0.4%	0	0.0%	1.0%	0	0.0%	0.8%	0	0.0%	0.8%	0	0.0%	0.8%
	Total	56	100%	16,278	100%	100.0%	32	100%	100%	8,301	100%	100%	24	100%	100%	7,977	100%	100%
REFINANCE	Low	1	4.5%	122	2.6%	0.2%	1	5.6%	0.5%	122	2.8%	0.4%	0	0.0%	0.3%	0	0.0%	0.5%
	Moderate	0	0.0%	0	0.0%	5.7%	0	0.0%	5.7%	0	0.0%	4.6%	0	0.0%	3.9%	0	0.0%	2.8%
	Middle	11	50.0%	1,233	26.1%	45.5%	8	44.4%	41.1%	985	22.6%	37.0%	3	75.0%	42.8%	248	65.4%	38.0%
	Upper	10	45.5%	3,377	71.4%	48.2%	9	50.0%	52.2%	3,246	74.6%	57.6%	1	25.0%	52.4%	131	34.6%	58.1%
	Unknown	0	0.0%	0	0.0%	0.4%	0	0.0%	0.5%	0	0.0%	0.4%	0	0.0%	0.6%	0	0.0%	0.6%
	Total	22	100%	4,732	100%	100.0%	18	100%	100%	4,353	100%	100%	4	100%	100%	379	100%	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	0.2%	0	0.0%	0.3%	0	0.0%	0.3%	0	0.0%	0.4%	0	0.0%	0.6%
	Moderate	1	20.0%	125	18.4%	5.7%	0	0.0%	3.3%	0	0.0%	2.9%	1	25.0%	3.8%	125	36.9%	2.7%
	Middle	3	60.0%	504	74.2%	45.5%	1	100.0%	37.6%	340	100.0%	32.6%	2	50.0%	40.0%	164	48.4%	36.1%
	Upper	1	20.0%	50	7.4%	48.2%	0	0.0%	58.4%	0	0.0%	63.9%	1	25.0%	55.6%	50	14.7%	60.6%
	Unknown	0	0.0%	0	0.0%	0.4%	0	0.0%	0.3%	0	0.0%	0.3%	0	0.0%	0.2%	0	0.0%	0.0%
	Total	5	100%	679	100%	100.0%	1	100%	100%	340	100%	100%	4	100%	100%	339	100%	100%
MULTI FAMILY	Multi-Family Units																	
	Low	1	25.0%	2,475	55.0%	15.5%	1	25.0%	10.7%	2,475	55.0%	2.8%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	2	50.0%	1,612	35.8%	12.4%	2	50.0%	21.4%	1,612	35.8%	2.5%	0	0.0%	20.0%	0	0.0%	4.5%
	Middle	1	25.0%	414	9.2%	24.5%	1	25.0%	28.6%	414	9.2%	3.9%	0	0.0%	30.0%	0	0.0%	8.4%
	Upper	0	0.0%	0	0.0%	42.1%	0	0.0%	39.3%	0	0.0%	90.8%	0	0.0%	50.0%	0	0.0%	87.1%
	Unknown	0	0.0%	0	0.0%	5.5%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
Total	4	100%	4,501	100%	100.0%	4	100%	100%	4,501	100%	100%	0	0.0%	100%	0	0.0%	100%	
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	0.2%	0	0.0%	1.2%	0	0.0%	0.7%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	5.7%	0	0.0%	3.3%	0	0.0%	2.3%	0	0.0%	1.9%	0	0.0%	1.2%
	Middle	9	50.0%	446	26.2%	45.5%	7	53.8%	37.0%	258	28.7%	29.0%	2	40.0%	36.7%	188	23.4%	32.7%
	Upper	9	50.0%	1,256	73.8%	48.2%	6	46.2%	57.8%	641	71.3%	67.5%	3	60.0%	61.4%	615	76.6%	66.1%
	Unknown	0	0.0%	0	0.0%	0.4%	0	0.0%	0.6%	0	0.0%	0.4%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	18	100%	1,702	100%	100.0%	13	100%	100%	899	100%	100%	5	100%	100%	803	100%	100%

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

Geographic Distribution of HMDA Loans - Table 2 of 2  
Assessment Area: OH Toledo 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			Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	\$%	%	#	%									%	\$ (000s)	\$%	\$%
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	0.2%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.7%	0	0.0%	0.3%
	Moderate	0	0.0%	0	0.0%	5.7%	0	0.0%	5.5%	0	0.0%	3.9%	0	0.0%	2.1%	0	0.0%	2.4%
	Middle	2	100.0%	205	100.0%	45.5%	2	100.0%	39.1%	205	100.0%	36.7%	0	0.0%	40.6%	0	0.0%	30.9%
	Upper	0	0.0%	0	0.0%	48.2%	0	0.0%	53.9%	0	0.0%	57.6%	0	0.0%	56.6%	0	0.0%	66.3%
	Unknown	0	0.0%	0	0.0%	0.4%	0	0.0%	1.6%	0	0.0%	1.8%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	2	100%	205	100%	100.0%	2	100%	100%	205	100%	100%	0	0.0%	100%	0	0.0%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	0.2%	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%	5.7%	0	0.0%	8.0%	0	0.0%	7.9%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	45.5%	0	0.0%	80.0%	0	0.0%	78.2%	0	0.0%	58.3%	0	0.0%	54.3%
	Upper	0	0.0%	0	0.0%	48.2%	0	0.0%	12.0%	0	0.0%	13.9%	0	0.0%	41.7%	0	0.0%	45.7%
	Unknown	0	0.0%	0	0.0%	0.4%	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	3.7%	3,127	11.1%	0.2%	4	5.7%	0.7%	3,127	16.8%	0.9%	0	0.0%	0.2%	0	0.0%	0.3%
	Moderate	10	9.3%	2,691	9.6%	5.7%	7	10.0%	5.3%	2,290	12.3%	3.8%	3	8.1%	4.5%	401	4.2%	3.4%
	Middle	51	47.7%	8,742	31.1%	45.5%	36	51.4%	39.5%	5,897	31.7%	29.5%	15	40.5%	39.5%	2,845	30.0%	32.2%
	Upper	42	39.3%	13,537	48.2%	48.2%	23	32.9%	53.8%	7,285	39.2%	65.2%	19	51.4%	55.2%	6,252	65.8%	63.6%
	Unknown	0	0.0%	0	0.0%	0.4%	0	0.0%	0.7%	0	0.0%	0.5%	0	0.0%	0.6%	0	0.0%	0.7%
	Total	107	100%	28,097	100%	100.0%	70	100%	100%	18,599	100%	100%	37	100%	100%	3,498	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: IN Cincinnati 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	Bank	Agg		
#	%	\$(000s)	\$%	%	#	%	%	\$(000s)	\$%	\$%	#	%	%	\$(000s)	\$%	\$%		
HOME PURCHASE	Low	27	19.6%	3,727	11.0%	19.8%	17	27.0%	13.1%	2,222	17.6%	7.8%	10	13.3%	12.5%	1,505	7.1%	6.7%
	Moderate	39	28.3%	7,275	21.5%	18.2%	20	31.7%	24.4%	3,487	27.6%	20.2%	19	25.3%	27.7%	3,788	17.9%	22.4%
	Middle	32	23.2%	8,363	24.7%	26.3%	9	14.3%	23.4%	1,890	14.9%	24.3%	23	30.7%	23.2%	6,473	30.6%	24.7%
	Upper	37	26.8%	13,615	40.3%	35.7%	15	23.8%	21.0%	4,432	35.0%	29.5%	22	29.3%	21.6%	9,183	43.4%	30.8%
	Unknown	3	2.2%	840	2.5%	0.0%	2	3.2%	18.1%	615	4.9%	18.1%	1	1.3%	15.1%	225	1.1%	15.4%
	Total	138	100%	33,820	100%	100.0%	63	100%	100%	12,646	100%	100%	75	100%	100%	21,174	100%	100%
REFINANCE	Low	22	17.2%	1,880	10.8%	19.8%	15	14.9%	16.5%	1,248	9.3%	11.1%	7	25.9%	17.2%	632	16.1%	11.3%
	Moderate	34	26.6%	4,128	23.7%	18.2%	30	29.7%	26.9%	3,698	27.4%	24.1%	4	14.8%	27.6%	430	10.9%	26.1%
	Middle	33	25.8%	5,091	29.3%	26.3%	25	24.8%	24.6%	3,765	27.9%	26.3%	8	29.6%	26.3%	1,326	33.7%	28.2%
	Upper	29	22.7%	5,235	30.1%	35.7%	22	21.8%	23.4%	3,834	28.5%	30.2%	7	25.9%	21.2%	1,401	35.6%	24.5%
	Unknown	10	7.8%	1,071	6.2%	0.0%	9	8.9%	8.6%	928	6.9%	8.3%	1	3.7%	7.7%	143	3.6%	9.9%
	Total	128	100%	17,405	100%	100.0%	101	100%	100%	13,473	100%	100%	27	100%	100%	3,932	100%	100%
HOME IMPROVEMENT	Low	8	15.4%	420	9.6%	19.8%	0	0.0%	10.3%	0	0.0%	7.5%	8	15.7%	10.6%	420	10.3%	6.6%
	Moderate	14	26.9%	752	17.2%	18.2%	0	0.0%	19.1%	0	0.0%	14.7%	14	27.5%	24.9%	752	18.5%	18.3%
	Middle	13	25.0%	1,229	28.1%	26.3%	1	100.0%	29.4%	300	100.0%	24.3%	12	23.5%	25.4%	929	22.8%	22.9%
	Upper	17	32.7%	1,972	45.1%	35.7%	0	0.0%	39.0%	0	0.0%	52.6%	17	33.3%	37.0%	1,972	48.4%	50.3%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	2.2%	0	0.0%	0.9%	0	0.0%	2.1%	0	0.0%	1.9%
	Total	52	100%	4,373	100%	100.0%	1	100%	100%	300	100%	100%	51	100%	100%	4,073	100%	100%
MULTI FAMILY	Low	0	0.0%	0	0.0%	19.8%	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%	18.2%	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%	26.3%	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%	35.7%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	1	100.0%	228	100.0%	0.0%	0	0.0%	100.0%	0	0.0%	100.0%	1	100.0%	100.0%	228	100.0%	100.0%
	Total	1	100%	228	100%	100.0%	0	0.0%	100%	0	0.0%	100%	1	100%	100%	228	100%	100%
OTHER PURPOSE LOC	Low	28	15.7%	1,276	8.8%	19.8%	18	13.6%	11.8%	838	8.0%	7.1%	10	21.7%	15.9%	438	11.0%	9.3%
	Moderate	50	28.1%	3,343	23.0%	18.2%	38	28.8%	27.6%	2,507	23.8%	23.8%	12	26.1%	23.8%	836	20.9%	18.7%
	Middle	39	21.9%	3,061	21.1%	26.3%	29	22.0%	29.6%	2,414	22.9%	27.8%	10	21.7%	25.4%	647	16.2%	19.7%
	Upper	55	30.9%	6,253	43.0%	35.7%	41	31.1%	27.6%	4,175	39.6%	37.0%	14	30.4%	32.5%	2,078	52.0%	50.9%
	Unknown	6	3.4%	602	4.1%	0.0%	6	4.5%	3.4%	602	5.7%	4.2%	0	0.0%	2.4%	0	0.0%	1.4%
	Total	178	100%	14,535	100%	100.0%	132	100%	100%	10,536	100%	100%	46	100%	100%	3,999	100%	100%

Originations &amp; Purchases

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

Borrower Distribution of HMDA Loans - Table 2 of 2  
Assessment Area: IN Cincinnati 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	Bank	Agg				
		#	%	\$(000s)	\$%	%	#	%	%	\$(000s)	\$%	\$%	#	%	%	\$(000s)	\$%	\$%
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	19.8%	0	0.0%	19.5%	0	0.0%	16.3%	0	0.0%	15.0%	0	0.0%	13.9%
	Moderate	0	0.0%	0	0.0%	18.2%	0	0.0%	29.3%	0	0.0%	18.0%	0	0.0%	25.0%	0	0.0%	24.4%
	Middle	0	0.0%	0	0.0%	26.3%	0	0.0%	17.1%	0	0.0%	10.8%	0	0.0%	31.7%	0	0.0%	26.4%
	Upper	0	0.0%	0	0.0%	35.7%	0	0.0%	31.7%	0	0.0%	50.7%	0	0.0%	25.0%	0	0.0%	33.6%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	2.4%	0	0.0%	4.2%	0	0.0%	3.3%	0	0.0%	1.7%
	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%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	19.8%	0	0.0%	10.0%	0	0.0%	13.4%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	18.2%	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%	26.3%	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%	35.7%	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%	90.0%	0	0.0%	86.6%	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	85	17.1%	7,303	10.4%	19.8%	50	16.8%	14.0%	4,308	11.7%	8.9%	35	17.5%	13.6%	2,995	9.0%	7.8%
	Moderate	137	27.6%	15,498	22.0%	18.2%	88	29.6%	25.2%	9,692	26.2%	21.2%	49	24.5%	26.7%	5,806	17.4%	22.6%
	Middle	117	23.5%	17,744	25.2%	26.3%	64	21.5%	24.6%	8,369	22.6%	24.7%	53	26.5%	24.7%	9,375	28.1%	25.0%
	Upper	138	27.8%	27,075	38.5%	35.7%	78	26.3%	23.8%	12,441	33.7%	30.8%	60	30.0%	24.7%	14,634	43.8%	31.5%
	Unknown	20	4.0%	2,741	3.9%	0.0%	17	5.7%	12.4%	2,145	5.8%	14.5%	3	1.5%	10.3%	596	1.8%	13.1%
	Total	497	100%	70,361	100%	100.0%	297	100%	100%	36,955	100%	100%	200	100%	100%	33,406	100%	100%

Originations &amp; Purchases

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

Geographic Distribution of HMDA Loans - Table 1 of 2  
Assessment Area: IN Cincinnati 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				Bank	Agg		Bank	Agg		Bank	Agg		
		#	%	\$ (000s)	%		#	%	%	\$ (000s)	%	%	#	%	%	%
HOME PURCHASE	Low	11	8.0%	1,466	4.3%	5.7%	7	11.1%	8.0%	849	6.7%	5.9%	4	5.3%	8.0%	6.1%
	Moderate	15	10.9%	2,444	7.2%	8.1%	7	11.1%	3.7%	1,126	8.9%	8.1%	8	10.7%	9.0%	1,318
	Middle	112	81.2%	29,910	88.4%	86.2%	49	77.8%	82.3%	10,671	84.4%	86.0%	63	84.0%	83.0%	19,239
	Upper	0	0.0%	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%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0
	Total	138	100%	33,820	100%	100.0%	63	100%	100%	12,646	100%	100%	75	100%	100%	21,174
REFINANCE	Low	7	5.5%	710	4.1%	5.7%	6	5.9%	4.3%	665	4.9%	3.2%	1	3.7%	6.1%	45
	Moderate	19	14.8%	2,291	13.2%	8.1%	14	13.9%	7.6%	1,583	11.7%	5.3%	5	18.5%	6.4%	708
	Middle	102	79.7%	14,404	82.8%	86.2%	81	80.2%	88.1%	11,225	83.3%	91.5%	21	77.8%	87.5%	3,179
	Upper	0	0.0%	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%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0
	Total	128	100%	17,405	100%	100.0%	101	100%	100%	13,473	100%	100%	27	100%	100%	3,932
HOME IMPROVEMENT	Low	1	1.9%	50	1.1%	5.7%	0	0.0%	2.2%	0	0.0%	1.4%	1	2.0%	2.6%	50
	Moderate	7	13.5%	205	4.7%	8.1%	0	0.0%	3.7%	0	0.0%	4.5%	7	13.7%	6.3%	205
	Middle	44	84.6%	4,118	94.2%	86.2%	1	100.0%	94.1%	300	100.0%	94.1%	43	84.3%	91.0%	3,818
	Upper	0	0.0%	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%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0
	Total	52	100%	4,373	100%	100.0%	1	100%	100%	300	100%	100%	51	100%	100%	4,073
MULTI FAMILY	Low	1	100.0%	228	100.0%	11.5%	0	0.0%	25.0%	0	0.0%	7.3%	1	100.0%	50.0%	228
	Moderate	0	0.0%	0	0.0%	52.8%	0	0.0%	75.0%	0	0.0%	92.7%	0	0.0%	50.0%	0
	Middle	0	0.0%	0	0.0%	35.7%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0
	Upper	0	0.0%	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%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0
	Total	1	100%	228	100%	100.0%	0	0.0%	100%	0	0.0%	100%	1	100%	100%	228
OTHER PURPOSE LOC	Low	18	10.1%	568	3.9%	5.7%	10	7.6%	6.4%	244	2.3%	2.4%	8	17.4%	7.9%	324
	Moderate	14	7.3%	924	6.4%	8.1%	9	6.8%	5.4%	668	6.3%	5.0%	5	10.9%	5.6%	256
	Middle	146	82.0%	13,043	89.7%	86.2%	113	85.6%	88.2%	9,624	91.3%	92.6%	33	71.7%	86.5%	3,419
	Upper	0	0.0%	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%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0
	Total	178	100%	14,535	100%	100.0%	132	100%	100%	10,536	100%	100%	46	100%	100%	3,999

Originations &amp; Purchases

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

Geographic Distribution of HMDA Loans - Table 2 of 2  
Assessment Area: IN Cincinnati 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				Bank	Agg		Bank	Agg		Bank	Agg		
		#	%	\$ (000s)	%		#	%	%	\$ (000s)	%	%	#	%	%	%
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	5.7%	0	0.0%	7.3%	0	0.0%	4.7%	0	0.0%	6.7%	0
	Moderate	0	0.0%	0	0.0%	8.1%	0	0.0%	7.3%	0	0.0%	9.5%	0	0.0%	11.7%	0
	Middle	0	0.0%	0	0.0%	86.2%	0	0.0%	85.4%	0	0.0%	85.8%	0	0.0%	81.7%	0
	Upper	0	0.0%	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%	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
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	5.7%	0	0.0%	20.0%	0	0.0%	15.2%	0	0.0%	0.0%	0
	Moderate	0	0.0%	0	0.0%	8.1%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0
	Middle	0	0.0%	0	0.0%	86.2%	0	0.0%	80.0%	0	0.0%	84.8%	0	0.0%	100.0%	0
	Upper	0	0.0%	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%	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
HMDA TOTALS	Low	38	7.6%	3,022	4.3%	5.7%	23	7.7%	6.3%	1,758	4.8%	4.8%	15	7.5%	6.8%	1,264
	Moderate	55	11.1%	5,864	8.3%	8.1%	30	10.1%	8.1%	3,377	9.1%	7.6%	25	12.5%	7.9%	2,487
	Middle	404	81.3%	61,475	87.4%	86.2%	244	82.2%	85.6%	31,820	86.1%	87.6%	160	80.0%	85.3%	29,655
	Upper	0	0.0%	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%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0
	Total	497	100%	70,361	100%	100.0%	297	100%	100%	36,955	100%	100%	200	100%	100%	33,406

Originations &amp; Purchases

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

## Small Business Lending Tables

Small Business & Small Farm Lending By Revenue & Loan Size  
Assessment Area: Nonmetropolitan Ohio

PRODUCT TYPE		Bank Lending & Demographic Data					Bank & Aggregate Lending									
		2022, 2023					2022					2023				
		Bank			Total Businesses		Count		Dollar			Count		Dollar		
		Count	Dollar				Bank	Agg	Bank	Agg		Bank		Bank		
		#	%	\$ (000s)	%	%	#	%	\$ 000s	%	%	#	%	\$ 000s	%	%
SMALL BUSINESS	Revenue	\$1 Million or Less	201	99.5%	24,379	99.9%	89.8%	103	99.0%	56.1%	37.2%	98	100.0%	10,991	100.0%	
		Over \$1 Million	0	0.0%	0	0.0%	8.3%	0	0.0%			0	0.0%	0	0.0%	
		Total/Rev. available	201	99.5%	24,379	99.9%	98.1%	103	99.0%			98	100.0%	10,991	100.0%	
		Rev. Not Known	1	0.5%	20	0.1%	1.9%	1	1.0%	20	0.1%	0	0.0%	0	0.0%	
		Total	202	100%	24,399	100%	100%	104	100%	13,408	100%	98	100%	10,991	100%	
	Loan Size	\$100,000 or Less	127	62.9%	5,342	21.9%		63	60.6%	94.6%	41.0%	64	65.3%	2,454	22.3%	
		\$100,001 - \$250,000	50	24.8%	8,030	32.9%		27	26.0%	3.1%	17.8%	23	23.5%	3,446	31.4%	
		\$250,001 - \$1 Million	25	12.4%	11,027	45.2%		14	13.5%	2.3%	41.2%	11	11.2%	5,091	46.3%	
		Total	202	100%	24,399	100%		104	100%	100%	100%	98	100%	10,991	100%	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	126	62.7%	5,322	21.8%		62	60.2%			64	65.3%	2,454	22.3%	
		\$100,001 - \$250,000	50	24.9%	8,030	32.9%		27	26.2%			23	23.5%	3,446	31.4%	
		\$250,001 - \$1 Million	25	12.4%	11,027	45.2%		14	13.6%			11	11.2%	5,091	46.3%	
		Total	201	100%	24,379	100%		103	100%			98	100%	10,991	100%	
SMALL FARM	Revenue				Total Farms											
		\$1 Million or Less	41	100.0%	4,912	100.0%	98.2%	11	100%	57.2%	67.3%	30	100%	3,489	100%	
		Over \$1 Million	0	0.0%	0	0.0%	1.4%	0	0.0%			0	0.0%	0	0.0%	
		Total/Rev. available	41	100.0%	4,912	100.0%	99.7%	11	100.0%			30	100.0%	3,489	100.0%	
		Not Known	0	0.0%	0	0.0%	0.3%	0	0.0%			0	0.0%	0	0.0%	
		Total	41	100%	4,912	100%	100%	11	100%			30	100%	3,489	100%	
	Loan Size	\$100,000 or Less	22	53.7%	1,202	24.5%		6	54.5%	83.2%	32.6%	16	53.3%	883	25.3%	
		\$100,001 - \$250,000	16	39.0%	2,566	52.2%		4	36.4%	11.6%	34.0%	12	40.0%	1,956	56.1%	
		\$250,001 - \$500,000	3	7.3%	1,144	23.3%		1	9.1%	5.3%	33.4%	2	6.7%	650	18.6%	
		Total	41	100%	4,912	100%		11	100%	100%	100%	30	100%	3,489	100%	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	22	53.7%	1,202	24.5%		6	54.5%			16	53.3%	883	25.3%	
		\$100,001 - \$250,000	16	39.0%	2,566	52.2%		4	36.4%			12	40.0%	1,956	56.1%	
		\$250,001 - \$500,000	3	7.3%	1,144	23.3%		1	9.1%			2	6.7%	650	18.6%	
		Total	41	100%	4,912	100%		11	100%			30	100%	3,489	100%	

Originations & Purchases

2023 Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue  
Based on 2023 FFIEC Census Data; 2016-2020 ACS data; 2023 D&B information



**Geographic Distribution of Small Business & Small Farm Loans**

Assessment Area: Nonmetropolitan Ohio

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending									
		2022, 2023					2022						2023			
		Count		Dollar		Total Businesses	Count		Dollar		Agg		Count		Dollar	
		#	%	\$ (000s)	\$ %	%	#	%	\$ 000s	\$ %			#	%	\$ 000s	\$ %
SMALL BUSINESSES	Low	10	5.0%	2,632	10.8%	0.9%	6	5.8%	0.7%	1,685	12.6%	1.6%	4	4.1%	947	8.6%
	Moderate	29	14.4%	3,418	14.0%	16.7%	16	15.4%	15.1%	1,923	14.3%	19.7%	13	13.3%	1,495	13.6%
	Middle	95	47.0%	10,450	42.8%	58.3%	43	41.3%	57.4%	5,206	38.8%	54.3%	52	53.1%	5,244	47.7%
	Upper	68	33.7%	7,899	32.4%	24.1%	39	37.5%	25.1%	4,594	34.3%	23.9%	29	29.6%	3,305	30.1%
	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%
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	1.7%	0	0.0%	0.5%	0	0.0%	0	0.0%
	Total	202	100%	24,399	100%	100.0%	104	100%	100%	13,408	100%	100%	98	100%	10,991	100%
SMALL FARM	Total Farms															
	Low	0	0.0%	0	0.0%	0.2%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Moderate	1	2.4%	21	0.4%	3.5%	0	0.0%	2.8%	0	0.0%	3.1%	1	3.3%	21	0.6%
	Middle	30	73.2%	3,846	78.3%	64.5%	8	72.7%	61.9%	1,275	89.6%	63.1%	22	73.3%	2,571	73.7%
	Upper	10	24.4%	1,045	21.3%	31.8%	3	27.3%	35.1%	148	10.4%	33.8%	7	23.3%	897	25.7%
	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%
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	0.2%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Total	41	100%	4,912	100%	100.0%	11	100%	100%	1,423	100%	100%	30	100%	3,489	100%

Originations & Purchases

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

Small Business & Small Farm Lending By Revenue & Loan Size  
Assessment Area: OH Toledo MSA

PRODUCT TYPE			Bank Lending & Demographic Data					Bank & Aggregate Lending										
			2022, 2023					2022					2023					
			Bank				Total Businesses	Count			Dollar			Count		Dollar		
			Count		Dollar			Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg			
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	\$ 000s	\$ %				
SMALL BUSINESS	Revenue	\$1 Million or Less	23	95.8%	4,095	92.4%	88.9%	11	91.7%	52.9%	2,163	86.6%	36.0%	12	100.0%	1,932	100.0%	
		Over \$1 Million	0	0.0%	0	0.0%	9.4%	0	0.0%		0	0.0%		0	0.0%	0	0.0%	
		Total Rev. available	23	95.8%	4,095	92.4%	98.2%	11	91.7%		2,163	86.6%		12	100.0%	1,932	100.0%	
		Rev. Not Known	1	4.2%	336	7.6%	1.8%	1	8.3%		336	13.4%		0	0.0%	0	0.0%	
		Total	24	100%	4,431	100%		12	100%		2,499	100%		12	100%	1,932	100%	
	Loan Size	\$100,000 or Less	12	50.0%	560	12.6%		6	50.0%	92.7%	334	13.4%	34.8%	6	50.0%	226	11.7%	
		\$100,001 - \$250,000	6	25.0%	859	19.4%		2	16.7%	3.3%	292	11.7%	13.9%	4	33.3%	567	29.3%	
		\$250,001 - \$1 Million	6	25.0%	3,012	68.0%		4	33.3%	4.0%	1,873	74.9%	51.3%	2	16.7%	1,139	59.0%	
		Total	24	100%	4,431	100%		12	100%	100%	2,499	100%	100%	12	100%	1,932	100%	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	12	52.2%	560	13.7%		6	54.5%		334	15.4%		6	50.0%	226	11.7%	
		\$100,001 - \$250,000	6	26.1%	859	21.0%		2	18.2%		292	13.5%		4	33.3%	567	29.3%	
		\$250,001 - \$1 Million	5	21.7%	2,676	65.3%		3	27.3%		1,537	71.1%		2	16.7%	1,139	59.0%	
		Total	23	100%	4,095	100%		11	100%		2,163	100%		12	100%	1,932	100%	
SMALL FARM	Revenue	\$1 Million or Less	0	0.0%	0	0.0%	Total Farms	0	0.0%	56.1%	0	0.0%	64.1%	0	0.0%	0	0.0%	
		Over \$1 Million	0	0.0%	0	0.0%		0	0.0%		0	0.0%		0	0.0%	0	0.0%	
		Total Rev. available	0	0.0%	0	0.0%		0	0.0%		0	0.0%		0	0.0%	0	0.0%	
		Not Known	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	0.0%		0	0.0%	0	0.0%	
	Loan Size	\$100,000 or Less	0	0.0%	0	0.0%		0	0.0%	67.1%	0	0.0%	15.5%	0	0.0%	0	0.0%	
		\$100,001 - \$250,000	0	0.0%	0	0.0%		0	0.0%	19.5%	0	0.0%	34.8%	0	0.0%	0	0.0%	
		\$250,001 - \$500,000	0	0.0%	0	0.0%		0	0.0%	13.4%	0	0.0%	49.7%	0	0.0%	0	0.0%	
		Total	0	0.0%	0	0.0%		0	0.0%	100%	0	0.0%	100%	0	0.0%	0	0.0%	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	0	0.0%	0	0.0%		0	0.0%		0	0.0%		0	0.0%	0	0.0%	
		\$100,001 - \$250,000	0	0.0%	0	0.0%		0	0.0%		0	0.0%		0	0.0%	0	0.0%	
		\$250,001 - \$500,000	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%		0	0.0%		0	0.0%		0	0.0%	0	0.0%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue  
Based on 2022 FFIEC Census Data; 2016-2020 ACS data; 2022 D&B information

**Geographic Distribution of Small Business & Small Farm Loans**

Assessment Area: OH Toledo MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending									
		2022, 2023					2022					2023				
		Count		Dollar		Total Businesses	Count		Dollar		Agg	Count		Dollar		Agg
		#	%	\$ (000s)	\$ %	%	#	%	\$ (000s)	\$ %		#	%	\$ (000s)	\$ %	
SMALL BUSINESSES	Low	0	0.0%	0	0.0%	2.2%	0	0.0%	1.6%	0	0.0%	0	0.0%	0	0.0%	0.7%
	Moderate	1	4.2%	10	0.2%	7.2%	0	0.0%	6.1%	0	0.0%	1	8.3%	10	0.5%	7.5%
	Middle	14	58.3%	1,921	43.4%	39.6%	8	66.7%	39.5%	1,462	58.5%	6	50.0%	459	23.8%	35.1%
	Upper	9	37.5%	2,500	56.4%	49.8%	4	33.3%	51.4%	1,037	41.5%	5	41.7%	1,463	75.7%	56.1%
	Unknown	0	0.0%	0	0.0%	1.2%	0	0.0%	0.9%	0	0.0%	0	0.0%	0	0.0%	0.4%
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	0.5%	0	0.0%	0	0.0%	0	0.0%	0.2%
	<b>Total</b>	<b>24</b>	<b>100%</b>	<b>4,431</b>	<b>100%</b>	<b>100.0%</b>	<b>12</b>	<b>100%</b>	<b>100%</b>	<b>2,499</b>	<b>100%</b>	<b>12</b>	<b>100%</b>	<b>1,932</b>	<b>100%</b>	<b>100%</b>
SMALL FARM		Total Farms														
	Low	0	0.0%	0	0.0%	0.7%	0	0.0%	0.6%	0	0.0%	0	0.0%	0	0.0%	0.2%
	Moderate	0	0.0%	0	0.0%	2.6%	0	0.0%	3.0%	0	0.0%	0	0.0%	0	0.0%	1.7%
	Middle	0	0.0%	0	0.0%	57.8%	0	0.0%	63.4%	0	0.0%	0	0.0%	0	0.0%	76.7%
	Upper	0	0.0%	0	0.0%	38.9%	0	0.0%	32.9%	0	0.0%	0	0.0%	0	0.0%	21.4%
	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%
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	0.0%	0	0.0%	0	0.0%	0	0.0%	0.0%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100%</b>

Originations & Purchases

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



**Small Business & Small Farm Lending By Revenue & Loan Size**  
Assessment Area: IN Cincinnati MSA

PRODUCT TYPE			Bank Lending & Demographic Data						Bank & Aggregate Lending									
			2022, 2023						2022						2023			
			Bank				Total Businesses	Count			Dollar			Agg	Count		Dollar	
			Count		Dollar			Bank		Agg	Bank		Agg		Bank		Dollar	
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	\$ 000s	\$ %	#	%	\$ 000s	\$ %
SMALL BUSINESS	Revenue	\$1Million or Less	20	90.9%	4,967	92.6%	93.6%	7	77.8%	60.5%	1,677	80.9%	48.5%	13	100.0%	3,290	100.0%	
		Over \$1Million	0	0.0%	0	0.0%	5.1%	0	0.0%		0	0.0%		0	0.0%	0	0.0%	
		Total Rev. available	20	90.9%	4,967	92.6%	98.7%	7	77.8%		1,677	80.9%		13	100.0%	3,290	100.0%	
		Rev. Not Known	2	9.1%	396	7.4%	1.3%	2	22.2%		396	19.1%		0	0.0%	0	0.0%	
		Total	22	100%	5,363	100%	100%	9	100%		2,073	100%		13	100%	3,290	100%	
	Loan Size	\$100,000 or Less	10	45.5%	420	7.8%		5	55.6%	94.9%	257	12.4%	40.0%	5	38.5%	163	5.0%	
		\$100,001 - \$250,000	8	36.4%	1,596	29.8%		2	22.2%	2.5%	396	19.1%	12.5%	6	46.2%	1,200	36.5%	
		\$250,001- \$1Million	4	18.2%	3,347	62.4%		2	22.2%	2.6%	1,420	68.5%	47.5%	2	15.4%	1,927	58.6%	
		Total	22	100%	5,363	100%		9	100%	100%	2,073	100%	100%	13	100%	3,290	100%	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	10	50.0%	420	8.5%		5	71.4%		257	15.3%		5	38.5%	163	5.0%	
		\$100,001 - \$250,000	6	30.0%	1,200	24.2%		0	0.0%		0	0.0%		6	46.2%	1,200	36.5%	
		\$250,001 - \$1Million	4	20.0%	3,347	67.4%		2	28.6%		1,420	84.7%		2	15.4%	1,927	58.6%	
		Total	20	100%	4,967	100%		7	100%		1,677	100%		13	100%	3,290	100%	
SMALL FARM	Revenue	\$1Million or Less	1	100.0%	50	100.0%	Total Farms	0	0.0%	54.5%	0	0.0%	63.0%	1	100%	50	100%	
		Over \$1Million	0	0.0%	0	0.0%	1.2%	0	0.0%		0	0.0%		0	0.0%	0	0.0%	
		Total Rev. available	1	100.0%	50	100.0%	100.0%	0	0.0%		0	0.0%		1	100.0%	50	100.0%	
		Not Known	0	0.0%	0	0.0%	0.0%	0	0.0%		0	0.0%		0	0.0%	0	0.0%	
		Total	1	100%	50	100%	100%	0	0.0%		0	0.0%		1	100%	50	100%	
	Loan Size	\$100,000 or Less	1	100.0%	50	100.0%		0	0.0%	100.0%	0	0.0%	100.0%	1	100.0%	50	100.0%	
		\$100,001 - \$250,000	0	0.0%	0	0.0%		0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%	
		\$250,001 - \$500,000	0	0.0%	0	0.0%		0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%	
		Total	1	100%	50	100%		0	0.0%	100%	0	0.0%	100%	1	100%	50	100%	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	1	100.0%	50	100.0%		0	0.0%		0	0.0%		1	100.0%	50	100.0%	
		\$100,001 - \$250,000	0	0.0%	0	0.0%		0	0.0%		0	0.0%		0	0.0%	0	0.0%	
		\$250,001 - \$500,000	0	0.0%	0	0.0%		0	0.0%		0	0.0%		0	0.0%	0	0.0%	
		Total	1	100%	50	100%		0	0.0%		0	0.0%		1	100%	50	100%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue

Based on 2022 FFIEC Census Data, 2016-2020 ACS data, 2022 D&B information

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: IN Cincinnati MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending									
		2022, 2023					2022					2023				
		Count		Dollar		Total Businesses	Count		Dollar			Count		Dollar		
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	#	%	\$ 000s	\$ %	%
SMALL BUSINESSES	Low	8	36.4%	1,302	24.3%	10.7%	2	22.2%	11.2%	396	19.1%	10.6%	6	46.2%	906	27.5%
	Moderate	7	31.8%	3,199	59.6%	20.7%	4	44.4%	18.5%	1,114	53.7%	34.9%	3	23.1%	2,085	63.4%
	Middle	7	31.8%	862	16.1%	68.7%	3	33.3%	70.1%	563	27.2%	54.4%	4	30.8%	299	9.1%
	Upper	0	0.0%	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%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Tr Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.2%	0	0.0%	0.1%	0	0.0%	0	0.0%
	Total	22	100%	5,363	100%	100.0%	9	100%	100%	2,073	100%	100%	13	100%	3,290	100%
SMALL FARM						Total Farms										
	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%	2.4%	0	0.0%	9.1%	0	0.0%	5.2%	0	0.0%	0	0.0%
	Middle	1	100.0%	50	100.0%	97.6%	0	0.0%	90.9%	0	0.0%	94.8%	1	100.0%	50	100.0%
	Upper	0	0.0%	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%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Tr 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	1	100%	50	100%	100.0%	0	0.0%	100%	0	0.0%	100%	1	100%	50	100%

Originations & Purchases

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

## APPENDIX F

### DEMOGRAPHIC INFORMATION

#### Limited-Scope Assessment Areas

#### Combined Demographics Report

##### Assessment Area: OH Akron MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	22	15.9%	13,911	10.1%	4,054	29.1%	29,547	21.4%
Moderate-income	31	22.5%	27,347	19.8%	4,120	15.1%	23,791	17.3%
Middle-income	43	31.2%	47,456	34.4%	2,575	5.4%	29,214	21.2%
Upper-income	39	28.3%	48,413	35.1%	1,471	3.0%	55,237	40.1%
Unknown-income	3	2.2%	662	0.5%	332	50.2%	0	0.0%
Total	138	100.0%	137,789	100.0%	12,552	9.1%	137,789	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	29,377	10,010	6.6%	34.1%	15,245	51.9%	4,122	14.0%
Moderate-income	54,830	27,265	18.1%	49.7%	21,970	40.1%	5,595	10.2%
Middle-income	85,468	55,569	36.9%	65.0%	24,139	28.2%	5,760	6.7%
Upper-income	73,531	57,455	38.2%	78.1%	12,637	17.2%	3,439	4.7%
Unknown-income	2,957	288	0.2%	9.7%	2,143	72.5%	526	17.8%
Total	246,163	150,587	100.0%	61.2%	76,134	30.9%	19,442	7.9%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	2,460	9.1%	2,190	8.9%	249	10.4%	21	9.0%
Moderate-income	3,963	14.6%	3,610	14.7%	328	13.7%	25	10.7%
Middle-income	8,787	32.4%	8,051	32.8%	670	28.0%	66	28.3%
Upper-income	11,072	40.8%	9,940	40.5%	1,024	42.7%	108	46.4%
Unknown-income	873	3.2%	734	3.0%	126	5.3%	13	5.6%
Total	27,155	100.0%	24,525	100.0%	2,397	100.0%	233	100.0%
	Percentage of Total Businesses:			90.3%		8.8%		0.9%
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	8	4.9%	7	4.4%	1	33.3%	0	0.0%
Moderate-income	11	6.8%	11	6.9%	0	0.0%	0	0.0%
Middle-income	47	29.0%	46	28.9%	1	33.3%	0	0.0%
Upper-income	96	59.3%	95	59.7%	1	33.3%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	162	100.0%	159	100.0%	3	100.0%	0	0.0%
	Percentage of Total Farms:			98.1%		1.9%		0.0%

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

### Combined Demographics Report

Assessment Area: OH Cleveland MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	80	18.7%	41,804	13.9%	14,358	34.3%	79,805	26.5%
Moderate-income	105	24.5%	67,917	22.5%	11,515	17.0%	52,248	17.3%
Middle-income	115	26.9%	90,514	30.0%	6,271	6.9%	55,452	18.4%
Upper-income	105	24.5%	95,248	31.6%	2,977	3.1%	114,061	37.8%
Unknown-income	23	5.4%	6,083	2.0%	2,670	43.9%	0	0.0%
Total	428	100.0%	301,566	100.0%	37,791	12.5%	301,566	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	104,569	28,111	8.9%	26.9%	55,622	53.2%	20,836	19.9%
Moderate-income	153,748	63,070	19.9%	41.0%	69,728	45.4%	20,950	13.6%
Middle-income	172,328	107,740	33.9%	62.5%	52,453	30.4%	12,135	7.0%
Upper-income	168,337	113,566	35.8%	67.5%	42,280	25.1%	12,491	7.4%
Unknown-income	18,813	5,077	1.6%	27.0%	10,240	54.4%	3,496	18.6%
Total	617,795	317,564	100.0%	51.4%	230,323	37.3%	69,908	11.3%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	8,923	12.6%	7,883	12.3%	974	16.1%	66	12.2%
Moderate-income	13,513	19.2%	12,419	19.4%	1,015	16.8%	79	14.5%
Middle-income	17,913	25.4%	16,693	26.1%	1,097	18.2%	123	22.7%
Upper-income	28,530	40.4%	25,509	39.9%	2,763	45.8%	258	47.5%
Unknown-income	1,668	2.4%	1,465	2.3%	186	3.1%	17	3.1%
Total	70,547	100.0%	63,969	100.0%	6,035	100.0%	543	100.0%
	Percentage of Total Businesses:		90.7%		8.6%		0.8%	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	26	11.0%	24	10.4%	1	20.0%	1	100.0%
Moderate-income	46	19.4%	46	19.9%	0	0.0%	0	0.0%
Middle-income	55	23.2%	53	22.9%	2	40.0%	0	0.0%
Upper-income	109	46.0%	107	46.3%	2	40.0%	0	0.0%
Unknown-income	1	0.4%	1	0.4%	0	0.0%	0	0.0%
Total	237	100.0%	231	100.0%	5	100.0%	1	100.0%
	Percentage of Total Farms:		97.5%		2.1%		0.4%	

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

### Combined Demographics Report

Assessment Area: OH Columbus MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	57	14.5%	33,668	8.8%	11,066	32.9%	83,260	21.8%
Moderate-income	83	21.1%	69,325	18.1%	11,576	16.7%	63,936	16.7%
Middle-income	123	31.3%	128,896	33.7%	8,379	6.5%	75,017	19.6%
Upper-income	122	31.0%	147,942	38.7%	3,417	2.3%	159,904	41.8%
Unknown-income	8	2.0%	2,286	0.6%	1,129	49.4%	0	0.0%
Total	393	100.0%	382,117	100.0%	35,567	9.3%	382,117	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	77,467	19,846	5.5%	25.6%	45,749	59.1%	11,872	15.3%
Moderate-income	134,150	54,557	15.0%	40.7%	69,066	51.5%	10,527	7.8%
Middle-income	228,913	130,738	35.9%	57.1%	86,068	37.6%	12,107	5.3%
Upper-income	223,857	157,536	43.3%	70.4%	56,642	25.3%	9,679	4.3%
Unknown-income	7,744	1,125	0.3%	14.5%	5,143	66.4%	1,476	19.1%
Total	672,131	363,802	100.0%	54.1%	262,668	39.1%	45,661	6.8%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	6,848	8.9%	6,203	8.8%	605	10.7%	40	5.1%
Moderate-income	12,156	15.8%	11,387	16.2%	688	12.2%	81	10.3%
Middle-income	24,179	31.5%	22,256	31.6%	1,690	30.0%	233	29.6%
Upper-income	32,515	42.3%	29,576	42.0%	2,519	44.7%	420	53.4%
Unknown-income	1,090	1.4%	948	1.3%	129	2.3%	13	1.7%
Total	76,788	100.0%	70,370	100.0%	5,631	100.0%	787	100.0%
	Percentage of Total Businesses:			91.6%		7.3%		1.0%
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	24	3.2%	22	3.0%	2	11.1%	0	0.0%
Moderate-income	75	9.9%	74	10.0%	1	5.6%	0	0.0%
Middle-income	298	39.4%	293	39.7%	5	27.8%	0	0.0%
Upper-income	359	47.5%	349	47.3%	10	55.6%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	756	100.0%	738	100.0%	18	100.0%	0	0.0%
	Percentage of Total Farms:			97.6%		2.4%		0.0%

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

## Combined Demographics Report

Assessment Area: OH Dayton MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	24	15.4%	13,998	10.5%	4,361	31.2%	32,893	24.6%
Moderate-income	39	25.0%	28,813	21.5%	5,861	20.3%	23,229	17.4%
Middle-income	58	37.2%	57,177	42.7%	4,111	7.2%	27,962	20.9%
Upper-income	32	20.5%	33,097	24.7%	1,114	3.4%	49,740	37.2%
Unknown-income	3	1.9%	739	0.6%	303	41.0%	0	0.0%
Total	156	100.0%	133,824	100.0%	15,750	11.8%	133,824	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	35,615	10,424	7.5%	29.3%	15,866	44.5%	9,325	26.2%
Moderate-income	64,826	27,527	19.7%	42.5%	28,627	44.2%	8,672	13.4%
Middle-income	99,310	63,324	45.4%	63.8%	29,434	29.6%	6,552	6.6%
Upper-income	53,047	37,634	27.0%	70.9%	12,749	24.0%	2,664	5.0%
Unknown-income	2,133	507	0.4%	23.8%	985	46.2%	641	30.1%
Total	254,931	139,416	100.0%	54.7%	87,661	34.4%	27,854	10.9%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	2,351	10.3%	2,097	10.1%	244	12.6%	10	7.1%
Moderate-income	4,830	21.2%	4,354	21.0%	459	23.7%	17	12.1%
Middle-income	8,399	36.8%	7,752	37.4%	589	30.4%	58	41.4%
Upper-income	7,069	31.0%	6,381	30.8%	634	32.7%	54	38.6%
Unknown-income	160	0.7%	145	0.7%	14	0.7%	1	0.7%
Total	22,809	100.0%	20,729	100.0%	1,940	100.0%	140	100.0%
	Percentage of Total Businesses:			90.9%		8.5%		0.6%
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	6	2.4%	6	2.5%	0	0.0%	0	0.0%
Moderate-income	30	12.1%	29	12.1%	1	16.7%	0	0.0%
Middle-income	144	58.3%	139	57.9%	5	83.3%	0	0.0%
Upper-income	66	26.7%	65	27.1%	0	0.0%	1	100.0%
Unknown-income	1	0.4%	1	0.4%	0	0.0%	0	0.0%
Total	247	100.0%	240	100.0%	6	100.0%	1	100.0%
	Percentage of Total Farms:			97.2%		2.4%		0.4%

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

### Combined Demographics Report

Assessment Area: OH Mansfield MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	3	10.0%	2,535	8.4%	711	28.0%	6,182	20.5%
Moderate-income	7	23.3%	3,720	12.3%	948	25.5%	5,151	17.1%
Middle-income	13	43.3%	15,510	51.5%	1,053	6.8%	6,807	22.6%
Upper-income	6	20.0%	8,365	27.8%	311	3.7%	11,995	39.8%
Unknown-income	1	3.3%	5	0.0%	0	0.0%	0	0.0%
Total	30	100.0%	30,135	100.0%	3,023	10.0%	30,135	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	5,534	2,261	6.9%	40.9%	2,678	48.4%	595	10.8%
Moderate-income	9,063	2,969	9.1%	32.8%	4,275	47.2%	1,819	20.1%
Middle-income	26,544	18,042	55.1%	68.0%	6,229	23.5%	2,273	8.6%
Upper-income	12,969	9,480	28.9%	73.1%	3,006	23.2%	483	3.7%
Unknown-income	39	10	0.0%	25.6%	17	43.6%	12	30.8%
Total	54,149	32,762	100.0%	60.5%	16,205	29.9%	5,182	9.6%
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	245	5.4%	229	5.6%	15	4.0%	1	2.1%
Moderate-income	943	20.8%	815	19.8%	120	32.1%	8	16.7%
Middle-income	1,984	43.7%	1,845	44.8%	116	31.0%	23	47.9%
Upper-income	1,306	28.8%	1,194	29.0%	96	25.7%	16	33.3%
Unknown-income	61	1.3%	34	0.8%	27	7.2%	0	0.0%
Total	4,539	100.0%	4,117	100.0%	374	100.0%	48	100.0%
	Percentage of Total Businesses:			90.7%		8.2%		1.1%
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	2	1.2%	2	1.2%	0	0.0%	0	0.0%
Moderate-income	1	0.6%	1	0.6%	0	0.0%	0	0.0%
Middle-income	118	68.2%	115	67.6%	3	100.0%	0	0.0%
Upper-income	52	30.1%	52	30.6%	0	0.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	173	100.0%	170	100.0%	3	100.0%	0	0.0%
	Percentage of Total Farms:			98.3%		1.7%		0.0%

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

## Combined Demographics Report

### Assessment Area: Nonmetropolitan Indiana

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%	1,307	16.6%
Moderate-income	0	0.0%	0	0.0%	0	0.0%	1,205	15.3%
Middle-income	3	42.9%	3,685	46.7%	502	13.6%	1,748	22.2%
Upper-income	4	57.1%	4,201	53.3%	247	5.9%	3,626	46.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	7	100.0%	7,886	100.0%	749	9.5%	7,886	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	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Middle-income	5,618	3,752	43.9%	66.8%	1,330	23.7%	536	9.5%
Upper-income	6,812	4,794	56.1%	70.4%	1,367	20.1%	651	9.6%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total	12,430	8,546	100.0%	68.8%	2,697	21.7%	1,187	9.5%
	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	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle-income	577	46.5%	520	47.0%	42	40.4%	15	50.0%
Upper-income	663	53.5%	586	53.0%	62	59.6%	15	50.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1,240	100.0%	1,106	100.0%	104	100.0%	30	100.0%
	Percentage of Total Businesses:			89.2%		8.4%		2.4%
	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	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle-income	78	54.9%	77	54.6%	1	100.0%	0	0.0%
Upper-income	64	45.1%	64	45.4%	0	0.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	142	100.0%	141	100.0%	1	100.0%	0	0.0%
	Percentage of Total Farms:			99.3%		0.7%		0.0%

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



## APPENDIX G

## LENDING TABLES - Limited-Scope Assessment Areas

## HMDA Lending Tables

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

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022					2023						
		Bank		Dollar		Families by Family Income	Count		Dollar			Count		Dollar				
		Count						Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg			
		#	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%
HOME PURCHASE	Low	4	10.0%	383	4.6%	21.4%	2	8.3%	10.4%	177	3.2%	5.4%	2	12.5%	13.2%	206	7.2%	7.2%
	Moderate	14	35.0%	1,787	21.4%	17.3%	8	33.3%	22.6%	992	18.1%	16.5%	6	37.5%	25.2%	795	27.8%	19.7%
	Middle	2	5.0%	408	4.9%	21.2%	1	4.2%	18.8%	193	3.5%	18.0%	1	6.3%	19.6%	215	7.5%	19.6%
	Upper	18	45.0%	5,248	62.9%	40.1%	12	50.0%	29.4%	4,020	73.3%	43.6%	6	37.5%	23.4%	1,228	43.0%	35.0%
	Unknown	2	5.0%	518	6.2%	0.0%	1	4.2%	18.7%	103	1.9%	16.4%	1	6.3%	18.7%	415	14.5%	18.6%
	Total	40	100%	8,344	100%	100.0%	24	100%	100%	5,485	100%	100%	16	100%	100%	2,859	100%	100%
REFINANCE	Low	2	6.9%	75	1.3%	21.4%	2	10.0%	11.2%	75	1.8%	6.0%	0	0.0%	17.2%	0	0.0%	10.2%
	Moderate	2	6.9%	162	2.8%	17.3%	1	5.0%	22.9%	98	2.3%	16.7%	1	11.1%	22.4%	64	3.9%	18.5%
	Middle	3	10.3%	621	10.6%	21.2%	2	10.0%	24.0%	385	9.1%	22.4%	1	11.1%	22.3%	236	14.4%	22.8%
	Upper	15	51.7%	3,830	65.5%	40.1%	11	55.0%	33.7%	2,762	65.6%	45.3%	4	44.4%	28.1%	1,068	65.2%	37.3%
	Unknown	7	24.1%	1,158	19.8%	0.0%	4	20.0%	8.1%	888	21.1%	9.7%	3	33.3%	10.0%	270	16.5%	11.2%
	Total	29	100%	5,846	100%	100.0%	20	100%	100%	4,208	100%	100%	9	100%	100%	1,638	100%	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	21.4%	0	0.0%	7.7%	0	0.0%	4.7%	0	0.0%	11.7%	0	0.0%	6.6%
	Moderate	0	0.0%	0	0.0%	17.3%	0	0.0%	18.5%	0	0.0%	13.4%	0	0.0%	21.9%	0	0.0%	16.8%
	Middle	0	0.0%	0	0.0%	21.2%	0	0.0%	24.7%	0	0.0%	22.1%	0	0.0%	26.2%	0	0.0%	22.8%
	Upper	2	66.7%	489	49.4%	40.1%	0	0.0%	46.4%	0	0.0%	56.6%	2	66.7%	37.1%	489	49.4%	50.0%
	Unknown	1	33.3%	500	50.6%	0.0%	0	0.0%	2.6%	0	0.0%	3.2%	1	33.3%	3.2%	500	50.6%	3.7%
	Total	3	100%	989	100%	100.0%	0	0.0%	100%	0	0.0%	100%	3	100%	100%	989	100%	100%
MULTI FAMILY	Low	0	0.0%	0	0.0%	21.4%	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%	17.3%	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%	21.2%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	2.1%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	40.1%	0	0.0%	1.1%	0	0.0%	0.1%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	7	100.0%	16,085	100.0%	0.0%	4	100.0%	98.9%	10,535	100.0%	99.9%	3	100.0%	97.9%	5,550	100.0%	100.0%
	Total	7	100%	16,085	100%	100.0%	4	100%	100%	10,535	100%	100%	3	100%	100%	5,550	100%	100%
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	21.4%	0	0.0%	9.4%	0	0.0%	5.6%	0	0.0%	15.5%	0	0.0%	9.1%
	Moderate	3	15.0%	176	5.3%	17.3%	2	14.3%	18.3%	146	5.8%	12.8%	1	16.7%	20.9%	30	3.7%	15.7%
	Middle	2	10.0%	282	8.5%	21.2%	1	7.1%	22.2%	20	0.8%	18.7%	1	16.7%	24.7%	262	32.6%	21.9%
	Upper	13	65.0%	2,509	75.4%	40.1%	10	71.4%	47.7%	2,063	81.7%	60.6%	3	50.0%	35.9%	446	55.5%	49.9%
	Unknown	2	10.0%	360	10.8%	0.0%	1	7.1%	2.3%	295	11.7%	2.2%	1	16.7%	3.1%	65	8.1%	3.5%
	Total	20	100%	3,327	100%	100.0%	14	100%	100%	2,524	100%	100%	6	100%	100%	803	100%	100%

Originations &amp; Purchases

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

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

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022						2023					
		Bank		Dollar		Families by Family Income	Count		Dollar		Agg	Count		Dollar		Agg		
		Count		\$ (000s)	\$ %		Bank	Agg	Bank	Agg		Bank	Agg	Bank	Agg			
		#	%		%	%	#	%	\$ (000s)	\$ %	%	#	%	\$ (000s)	\$ %	%		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	21.4%	0	0.0%	0	0.0%	6.7%	0	0.0%	14.9%	0	0.0%	9.8%	
	Moderate	0	0.0%	0	0.0%	17.3%	0	0.0%	0	0.0%	14.5%	0	0.0%	23.2%	0	0.0%	17.9%	
	Middle	0	0.0%	0	0.0%	21.2%	0	0.0%	0	0.0%	19.0%	0	0.0%	23.8%	0	0.0%	24.4%	
	Upper	0	0.0%	0	0.0%	40.1%	0	0.0%	0	0.0%	48.9%	0	0.0%	32.6%	0	0.0%	42.6%	
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%	10.9%	0	0.0%	5.5%	0	0.0%	5.2%	
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	21.4%	0	0.0%	0	0.0%	0.4%	0	0.0%	1.1%	0	0.0%	0.6%	
	Moderate	0	0.0%	0	0.0%	17.3%	0	0.0%	0	0.0%	1.1%	0	0.0%	0.0%	0	0.0%	0.0%	
	Middle	0	0.0%	0	0.0%	21.2%	0	0.0%	0	0.0%	1.9%	0	0.0%	1.1%	0	0.0%	0.8%	
	Upper	0	0.0%	0	0.0%	40.1%	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%	0	0.0%	96.6%	0	0.0%	97.7%	0	0.0%	98.6%	
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	
HMDA TOTALS	Low	6	6.1%	458	1.3%	21.4%	4	6.5%	252	1.1%	5.0%	2	5.4%	13.9%	206	1.7%	6.7%	
	Moderate	19	19.2%	2,125	6.1%	17.3%	11	17.7%	1,236	5.4%	14.7%	8	21.6%	23.7%	889	7.5%	16.6%	
	Middle	7	7.1%	1,311	3.8%	21.2%	4	6.5%	598	2.6%	17.5%	3	8.1%	21.1%	713	6.0%	17.7%	
	Upper	48	48.5%	12,076	34.9%	40.1%	33	53.2%	8,845	38.9%	40.8%	15	40.5%	26.7%	3,231	27.3%	31.8%	
	Unknown	19	19.2%	18,621	53.8%	0.0%	10	16.1%	11,821	52.0%	22.1%	9	24.3%	14.6%	6,800	57.4%	27.2%	
	Total	99	100%	34,591	100%	100.0%	62	100%	22,752	100%	100%	37	100%	100%	11,839	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: OH Akron 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				
		Count	Dollar				Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg					
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%			
HOME PURCHASE	Low	4	10.0%	316	3.8%	6.6%	2	8.3%	7.8%	157	2.9%	3.8%	2	12.5%	8.9%	159	5.6%	4.7%	
	Moderate	9	22.5%	1,034	12.4%	18.1%	5	20.8%	21.0%	587	10.7%	13.4%	4	25.0%	24.0%	447	15.6%	15.5%	
	Middle	17	42.5%	3,699	44.3%	36.9%	9	37.5%	38.3%	2,029	37.0%	34.9%	8	50.0%	36.1%	1,670	58.4%	35.1%	
	Upper	9	22.5%	3,211	38.5%	38.2%	7	29.2%	32.5%	2,628	47.9%	47.6%	2	12.5%	30.7%	583	20.4%	44.5%	
	Unknown	1	2.5%	84	1.0%	0.2%	1	4.2%	0.5%	84	1.5%	0.3%	0	0.0%	0.4%	0	0.0%	0.2%	
	Total	40	N/A%	8,344	N/A%	100.0%	24	N/A%	N/A%	5,485	N/A%	N/A%	16	N/A%	N/A%	2,853	N/A%	N/A%	
HOME REFINANCE	Low	2	6.9%	141	2.4%	6.6%	1	5.0%	4.0%	77	1.8%	2.1%	1	11.1%	5.3%	64	3.9%	3.3%	
	Moderate	5	17.2%	368	6.3%	18.1%	3	15.0%	13.5%	243	5.8%	8.7%	2	22.2%	16.3%	125	7.6%	11.9%	
	Middle	8	27.6%	1,576	27.0%	36.9%	4	20.0%	38.8%	394	9.4%	32.8%	4	44.4%	36.6%	1,182	72.2%	32.8%	
	Upper	13	44.8%	3,731	63.8%	38.2%	11	55.0%	43.6%	3,464	82.3%	56.3%	2	22.2%	41.5%	267	16.3%	51.9%	
	Unknown	1	3.4%	30	0.5%	0.2%	1	5.0%	0.2%	30	0.7%	0.1%	0	0.0%	0.3%	0	0.0%	0.2%	
	Total	29	N/A%	5,846	N/A%	100.0%	20	N/A%	N/A%	4,208	N/A%	N/A%	9	N/A%	N/A%	1,638	N/A%	N/A%	
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	6.6%	0	0.0%	3.2%	0	0.0%	1.3%	0	0.0%	3.9%	0	0.0%	2.1%	
	Moderate	0	0.0%	0	0.0%	18.1%	0	0.0%	9.9%	0	0.0%	6.0%	0	0.0%	13.6%	0	0.0%	8.4%	
	Middle	0	0.0%	0	0.0%	36.9%	0	0.0%	33.2%	0	0.0%	27.9%	0	0.0%	37.9%	0	0.0%	33.9%	
	Upper	3	100.0%	989	100.0%	38.2%	0	0.0%	53.6%	0	0.0%	64.8%	3	100.0%	44.6%	989	100.0%	55.5%	
	Unknown	0	0.0%	0	0.0%	0.2%	0	0.0%	0.1%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	
	Total	3	N/A%	989	N/A%	100.0%	0	0.0%	N/A%	0	0.0%	N/A%	3	N/A%	N/A%	989	N/A%	N/A%	
MULTI-FAMILY	Low	2	28.6%	4,382	27.2%	Multi-Family Units		1	25.0%	20.0%	3,282	31.2%	5.8%	1	33.3%	29.8%	1,100	19.8%	7.4%
	Moderate	1	14.3%	1,600	9.9%		1	25.0%	32.6%	1,600	15.2%	41.6%	0	0.0%	17.0%	0	0.0%	2.8%	
	Middle	2	28.6%	2,973	18.5%		1	25.0%	27.4%	323	3.1%	20.4%	1	33.3%	31.9%	2,650	47.7%	23.7%	
	Upper	1	14.3%	5,330	33.1%		1	25.0%	14.7%	5,330	50.6%	30.8%	0	0.0%	17.0%	0	0.0%	65.5%	
	Unknown	1	14.3%	1,800	11.2%	4.3%	0	0.0%	5.3%	0	0.0%	1.3%	1	33.3%	4.3%	1,800	32.4%	0.6%	
	Total	7	N/A%	15,085	N/A%	100.0%	4	N/A%	N/A%	10,535	N/A%	N/A%	3	N/A%	N/A%	5,550	N/A%	N/A%	
OTHER PURPOSE LOC	Low	1	5.0%	46	1.4%	6.6%	1	7.1%	2.7%	46	1.8%	1.4%	0	0.0%	4.0%	0	0.0%	1.9%	
	Moderate	1	5.0%	65	2.0%	18.1%	0	0.0%	10.6%	0	0.0%	5.9%	1	16.7%	13.7%	65	8.1%	9.8%	
	Middle	1	5.0%	195	5.9%	36.9%	0	0.0%	34.0%	0	0.0%	28.7%	1	16.7%	37.0%	195	24.3%	30.1%	
	Upper	17	85.0%	3,021	90.8%	38.2%	13	92.9%	52.7%	2,478	98.2%	63.6%	4	66.7%	45.2%	543	67.6%	58.1%	
	Unknown	0	0.0%	0	0.0%	0.2%	0	0.0%	0.1%	0	0.0%	0.4%	0	0.0%	0.1%	0	0.0%	0.0%	
	Total	20	N/A%	3,327	N/A%	100.0%	14	N/A%	N/A%	2,624	N/A%	N/A%	6	N/A%	N/A%	803	N/A%	N/A%	

Originations &amp; Purchases

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

Borrower Distribution of HMDA Loans - Table 2 of 2  
Assessment Area: OH Akron 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%	21.4%	0	0.0%	11.8%	0	0.0%	6.7%	0	0.0%	14.9%	0	0.0%	9.8%
	Moderate	0	0.0%	0	0.0%	17.3%	0	0.0%	19.9%	0	0.0%	14.5%	0	0.0%	23.2%	0	0.0%	17.9%
	Middle	0	0.0%	0	0.0%	21.2%	0	0.0%	23.2%	0	0.0%	19.0%	0	0.0%	23.8%	0	0.0%	24.4%
	Upper	0	0.0%	0	0.0%	40.1%	0	0.0%	35.1%	0	0.0%	48.9%	0	0.0%	32.6%	0	0.0%	42.6%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	10.0%	0	0.0%	10.9%	0	0.0%	5.5%	0	0.0%	5.2%
	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%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	21.4%	0	0.0%	0.7%	0	0.0%	0.4%	0	0.0%	1.1%	0	0.0%	0.6%
	Moderate	0	0.0%	0	0.0%	17.3%	0	0.0%	2.1%	0	0.0%	1.1%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	21.2%	0	0.0%	1.4%	0	0.0%	1.9%	0	0.0%	1.1%	0	0.0%	0.8%
	Upper	0	0.0%	0	0.0%	40.1%	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%	95.8%	0	0.0%	96.6%	0	0.0%	97.7%	0	0.0%	98.6%
	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	6	6.1%	458	1.3%	21.4%	4	6.5%	10.2%	252	1.1%	5.0%	2	5.4%	13.9%	206	1.7%	6.7%
	Moderate	19	19.2%	2,125	6.1%	17.3%	11	17.7%	21.7%	1,236	5.4%	14.7%	8	21.6%	23.7%	889	7.5%	16.6%
	Middle	7	7.1%	1,311	3.8%	21.2%	4	6.5%	20.9%	598	2.6%	17.5%	3	8.1%	21.1%	713	6.0%	17.7%
	Upper	48	48.5%	12,076	34.9%	40.1%	33	53.2%	33.2%	8,845	38.9%	40.8%	15	40.5%	26.7%	3,231	27.3%	31.8%
	Unknown	19	19.2%	18,621	53.8%	0.0%	10	16.1%	14.0%	11,821	52.0%	22.1%	9	24.3%	14.6%	6,800	57.4%	27.2%
	Total	99	100%	34,591	100%	100.0%	62	100%	100%	22,752	100%	100%	37	100%	100%	11,829	100%	100%

Originations &amp; Purchases

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

Borrower Distribution of HMDA Loans - Table 1 of 2  
Assessment Area: OH Cleveland-Elyria MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022					2023						
		Bank		Dollar		Families by Family Income	Count		Dollar		Agg	Count		Dollar		Agg		
		Count	%	\$ (000s)	\$ %		%	Bank	Agg	%		\$ (000s)	\$ %	%	Bank		Agg	\$ (000s)
HOME PURCHASE	Low	8	9.3%	949	4.8%	26.5%	7	13.2%	9.9%	880	7.4%	5.4%	1	3.0%	10.1%	69	0.9%	5.4%
	Moderate	14	16.3%	2,222	11.1%	17.3%	10	18.9%	21.9%	1,731	14.5%	15.7%	4	12.1%	23.3%	491	6.1%	17.3%
	Middle	16	18.6%	2,942	14.7%	18.4%	8	15.1%	18.6%	1,412	11.8%	17.0%	8	24.2%	18.3%	1,530	19.2%	17.1%
	Upper	42	48.8%	11,444	57.4%	37.8%	24	45.3%	31.2%	6,644	55.5%	45.6%	18	54.5%	29.0%	4,800	60.1%	41.8%
	Unknown	6	7.0%	2,392	12.0%	0.0%	4	7.5%	18.5%	1,298	10.8%	16.3%	2	6.1%	19.3%	1,094	13.7%	18.4%
	Total	86	100%	19,949	100%	100.0%	53	100%	100%	11,965	100%	100%	33	100%	100%	7,984	100%	100%
REFINANCE	Low	2	3.1%	200	1.9%	26.5%	1	2.6%	11.5%	120	1.7%	6.4%	1	3.8%	13.0%	80	2.4%	7.3%
	Moderate	6	9.2%	694	6.7%	17.3%	4	10.3%	22.9%	539	7.7%	16.8%	2	7.7%	23.2%	155	4.7%	18.1%
	Middle	12	18.5%	1,477	14.3%	18.4%	10	25.6%	22.4%	1,288	18.3%	20.5%	2	7.7%	20.0%	189	5.7%	18.4%
	Upper	37	56.9%	6,074	58.7%	37.8%	20	51.3%	32.5%	3,785	53.7%	44.8%	17	65.4%	28.6%	2,289	69.3%	39.7%
	Unknown	8	12.3%	1,899	18.4%	0.0%	4	10.3%	10.7%	1,311	18.6%	11.4%	4	15.4%	15.2%	588	17.8%	16.6%
	Total	65	100%	10,344	100%	100.0%	39	100%	100%	7,043	100%	100%	26	100%	100%	3,301	100%	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	26.5%	0	0.0%	10.6%	0	0.0%	6.0%	0	0.0%	12.2%	0	0.0%	6.6%
	Moderate	0	0.0%	0	0.0%	17.3%	0	0.0%	20.6%	0	0.0%	14.1%	0	0.0%	23.1%	0	0.0%	15.9%
	Middle	1	12.5%	66	2.6%	18.4%	0	0.0%	23.3%	0	0.0%	20.5%	1	14.3%	23.9%	66	3.4%	21.3%
	Upper	7	87.5%	2,480	97.4%	37.8%	1	100.0%	42.9%	593	100.0%	56.5%	6	85.7%	38.2%	1,887	96.6%	53.1%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	2.5%	0	0.0%	2.9%	0	0.0%	2.6%	0	0.0%	3.1%
	Total	8	100%	2,546	100%	100.0%	1	100%	100%	593	100%	100%	7	100%	100%	1,953	100%	100%
MULTI FAMILY	Low	0	0.0%	0	0.0%	26.5%	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%	17.3%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.8%	0	0.0%	0.1%
	Middle	0	0.0%	0	0.0%	18.4%	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%	37.8%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	8	100.0%	15,437	100.0%	0.0%	2	100.0%	100.0%	7,468	100.0%	100.0%	6	100.0%	99.2%	7,969	100.0%	99.9%
	Total	8	100%	15,437	100%	100.0%	2	100%	100%	7,468	100%	100%	6	100%	100%	7,969	100%	100%
OTHER PURPOSE LOC	Low	3	13.0%	386	9.0%	26.5%	3	17.6%	9.5%	386	13.7%	5.8%	0	0.0%	11.8%	0	0.0%	6.7%
	Moderate	6	26.1%	565	13.2%	17.3%	5	29.4%	20.3%	485	17.2%	13.6%	1	16.7%	23.1%	80	5.5%	16.4%
	Middle	1	4.3%	125	2.9%	18.4%	1	5.9%	22.9%	125	4.4%	18.6%	0	0.0%	24.4%	0	0.0%	19.8%
	Upper	9	39.1%	1,919	44.9%	37.8%	6	35.3%	43.2%	891	31.5%	57.1%	3	50.0%	36.8%	1,028	71.1%	53.2%
	Unknown	4	17.4%	1,277	29.9%	0.0%	2	11.8%	4.0%	940	33.3%	4.9%	2	33.3%	3.8%	337	23.3%	3.8%
	Total	23	100%	4,272	100%	100.0%	17	100%	100%	2,827	100%	100%	6	100%	100%	1,445	100%	100%

Originations &amp; Purchases

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

Borrower Distribution of HMDA Loans - Table 2 of 2  
Assessment Area: OH Cleveland-Elyria MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022					2023						
		Bank		Dollar		Families by Family Income	Count		Dollar			Count		Dollar				
		Count					Bank	Agg	Bank		Agg	Bank	Agg	Bank		Agg		
#	%	\$(000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	26.5%	0	0.0%	12.8%	0	0.0%	7.3%	0	0.0%	14.3%	0	0.0%	7.9%
	Moderate	0	0.0%	0	0.0%	17.3%	0	0.0%	22.9%	0	0.0%	12.6%	0	0.0%	21.4%	0	0.0%	13.8%
	Middle	0	0.0%	0	0.0%	18.4%	0	0.0%	17.0%	0	0.0%	12.7%	0	0.0%	22.2%	0	0.0%	16.4%
	Upper	0	0.0%	0	0.0%	37.8%	0	0.0%	37.8%	0	0.0%	55.0%	0	0.0%	33.9%	0	0.0%	43.1%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	9.6%	0	0.0%	12.4%	0	0.0%	8.2%	0	0.0%	18.8%
	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%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	26.5%	0	0.0%	2.0%	0	0.0%	1.0%	0	0.0%	2.6%	0	0.0%	1.0%
	Moderate	0	0.0%	0	0.0%	17.3%	0	0.0%	0.6%	0	0.0%	0.5%	0	0.0%	2.6%	0	0.0%	2.6%
	Middle	0	0.0%	0	0.0%	18.4%	0	0.0%	0.3%	0	0.0%	0.3%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	37.8%	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%	97.1%	0	0.0%	98.1%	0	0.0%	94.7%	0	0.0%	96.4%
	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	13	6.8%	1,535	2.9%	26.5%	11	9.8%	10.3%	1,386	4.6%	4.8%	2	2.6%	11.0%	149	0.7%	5.0%
	Moderate	26	13.7%	3,481	6.6%	17.3%	19	17.0%	21.6%	2,755	9.2%	13.4%	7	9.0%	22.9%	726	3.2%	14.8%
	Middle	30	15.8%	4,610	8.8%	18.4%	19	17.0%	20.1%	2,825	9.4%	15.3%	11	14.1%	19.5%	1,785	7.9%	15.1%
	Upper	95	50.0%	21,917	41.7%	37.8%	51	45.5%	33.2%	11,913	39.8%	39.5%	44	56.4%	30.3%	10,004	44.2%	36.4%
	Unknown	26	13.7%	21,005	40.0%	0.0%	12	10.7%	14.8%	11,017	36.9%	26.9%	14	17.3%	16.3%	9,988	44.1%	28.7%
	Total	190	100%	52,548	100%	100.0%	112	100%	100%	29,896	100%	100%	78	100%	100%	22,652	100%	100%

Originations &amp; Purchases

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

Geographic Distribution of HMDA Loans - Table 1 of 2  
Assessment Area: OH Cleveland-Elyria 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												
HOME PURCHASE	Low	11	12.8%	1,447	7.3%	8.9%	5	9.4%	8.2%	415	3.5%	5.2%	6	18.2%	9.4%	1,032	12.9%	5.7%
	Moderate	17	19.8%	1,862	9.3%	19.9%	10	18.9%	21.4%	1,081	9.0%	14.0%	7	21.2%	22.7%	781	9.8%	15.2%
	Middle	29	33.7%	4,951	24.8%	33.9%	19	35.8%	37.5%	3,156	26.4%	32.1%	10	30.3%	36.5%	1,795	22.5%	32.5%
	Upper	29	33.7%	11,689	58.6%	35.8%	19	35.8%	32.0%	7,313	61.1%	48.2%	10	30.3%	30.2%	4,376	54.8%	45.9%
	Unknown	0	0.0%	0	0.0%	1.6%	0	0.0%	0.9%	0	0.0%	0.5%	0	0.0%	1.3%	0	0.0%	0.7%
	Total	86	100%	19,949	100%	100.0%	53	100%	100%	11,965	100%	100%	33	100%	100%	7,984	100%	100%
REFINANCE	Low	17	26.2%	1,745	16.9%	8.9%	6	15.4%	5.4%	883	12.5%	3.6%	11	42.3%	6.6%	862	26.1%	4.6%
	Moderate	16	24.6%	1,438	13.9%	19.9%	11	28.2%	16.4%	1,102	15.6%	10.7%	5	19.2%	18.3%	336	10.2%	12.7%
	Middle	9	13.8%	1,592	15.4%	33.9%	5	12.8%	37.3%	1,121	15.9%	31.1%	4	15.4%	36.9%	471	14.3%	32.2%
	Upper	21	32.3%	5,470	52.9%	35.8%	16	41.0%	40.1%	3,884	55.1%	54.2%	5	19.2%	37.1%	1,586	48.0%	49.8%
	Unknown	2	3.1%	99	1.0%	1.6%	1	2.6%	0.9%	53	0.8%	0.6%	1	3.8%	1.0%	46	1.4%	0.6%
	Total	65	100%	10,344	100%	100.0%	39	100%	100%	7,043	100%	100%	26	100%	100%	3,301	100%	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	8.9%	0	0.0%	4.9%	0	0.0%	2.9%	0	0.0%	4.9%	0	0.0%	2.7%
	Moderate	0	0.0%	0	0.0%	19.9%	0	0.0%	13.0%	0	0.0%	8.4%	0	0.0%	16.3%	0	0.0%	10.4%
	Middle	1	12.5%	66	2.6%	33.9%	0	0.0%	33.5%	0	0.0%	26.1%	1	14.3%	35.1%	66	3.4%	29.1%
	Upper	7	87.5%	2,480	97.4%	35.8%	1	100.0%	47.9%	593	100.0%	62.2%	6	85.7%	43.0%	1,887	96.6%	57.4%
	Unknown	0	0.0%	0	0.0%	1.6%	0	0.0%	0.6%	0	0.0%	0.4%	0	0.0%	0.6%	0	0.0%	0.5%
	Total	8	100%	2,546	100%	100.0%	1	100%	100%	593	100%	100%	7	100%	100%	1,953	100%	100%
MULTI-FAMILY	Low	1	12.5%	6,768	43.8%	18.8%	1	50.0%	18.4%	6,768	90.6%	9.5%	0	0.0%	25.8%	0	0.0%	7.5%
	Moderate	2	25.0%	2,022	13.1%	27.3%	0	0.0%	33.2%	0	0.0%	35.3%	2	33.3%	24.2%	2,022	25.4%	4.4%
	Middle	5	62.5%	6,647	43.1%	23.2%	1	50.0%	26.5%	700	9.4%	18.6%	4	66.7%	21.7%	5,947	74.6%	15.5%
	Upper	0	0.0%	0	0.0%	25.8%	0	0.0%	18.4%	0	0.0%	35.5%	0	0.0%	22.5%	0	0.0%	72.1%
	Unknown	0	0.0%	0	0.0%	4.8%	0	0.0%	3.6%	0	0.0%	1.2%	0	0.0%	5.8%	0	0.0%	0.5%
	Total	8	100%	15,437	100%	100.0%	2	100%	100%	7,468	100%	100%	6	100%	100%	7,969	100%	100%
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	8.9%	0	0.0%	3.4%	0	0.0%	2.1%	0	0.0%	3.9%	0	0.0%	1.8%
	Moderate	0	0.0%	0	0.0%	19.9%	0	0.0%	10.4%	0	0.0%	5.8%	0	0.0%	13.7%	0	0.0%	8.3%
	Middle	6	26.1%	685	16.0%	33.9%	5	29.4%	32.5%	586	20.7%	23.1%	1	16.7%	35.2%	99	6.9%	27.9%
	Upper	16	69.6%	3,519	82.4%	35.8%	11	64.7%	53.2%	2,173	76.9%	68.7%	5	83.3%	46.6%	1,346	93.1%	61.6%
	Unknown	1	4.3%	68	1.6%	1.6%	1	5.9%	0.6%	68	2.4%	0.3%	0	0.0%	0.5%	0	0.0%	0.4%
	Total	23	100%	4,272	100%	100.0%	17	100%	100%	2,827	100%	100%	6	100%	100%	1,445	100%	100%

Originations &amp; Purchases

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

Geographic Distribution of HMDA Loans - Table 2 of 2  
Assessment Area: OH Cleveland-Elyria 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		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg						
#	%	\$( 000s)	\$%	%	#	%	%	\$( 000s)	\$%	\$%	#	%	%	\$( 000s)	\$%	\$%		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	8.9%	0	0.0%	7.9%	0	0.0%	4.4%	0	0.0%	6.1%	0	0.0%	4.4%
	Moderate	0	0.0%	0	0.0%	19.9%	0	0.0%	17.1%	0	0.0%	9.7%	0	0.0%	19.5%	0	0.0%	12.0%
	Middle	0	0.0%	0	0.0%	33.9%	0	0.0%	32.2%	0	0.0%	21.7%	0	0.0%	35.5%	0	0.0%	26.2%
	Upper	0	0.0%	0	0.0%	35.8%	0	0.0%	41.7%	0	0.0%	63.4%	0	0.0%	37.7%	0	0.0%	56.1%
	Unknown	0	0.0%	0	0.0%	1.6%	0	0.0%	1.1%	0	0.0%	0.8%	0	0.0%	1.3%	0	0.0%	1.2%
	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%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	8.9%	0	0.0%	10.4%	0	0.0%	5.7%	0	0.0%	6.3%	0	0.0%	4.0%
	Moderate	0	0.0%	0	0.0%	19.9%	0	0.0%	33.1%	0	0.0%	36.8%	0	0.0%	39.5%	0	0.0%	35.1%
	Middle	0	0.0%	0	0.0%	33.9%	0	0.0%	40.3%	0	0.0%	35.6%	0	0.0%	42.6%	0	0.0%	44.2%
	Upper	0	0.0%	0	0.0%	35.8%	0	0.0%	15.0%	0	0.0%	20.8%	0	0.0%	10.5%	0	0.0%	15.8%
	Unknown	0	0.0%	0	0.0%	1.6%	0	0.0%	1.2%	0	0.0%	1.1%	0	0.0%	1.1%	0	0.0%	1.0%
	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	29	15.3%	9,960	19.0%	8.9%	12	10.7%	6.8%	8,066	27.0%	5.3%	17	21.8%	8.0%	1,894	8.4%	5.5%
	Moderate	35	18.4%	5,322	10.1%	19.9%	21	18.8%	18.5%	2,183	7.3%	16.0%	14	17.9%	20.6%	3,139	13.9%	13.0%
	Middle	50	26.3%	13,941	26.5%	33.9%	30	26.8%	36.5%	5,563	18.6%	29.3%	20	25.6%	36.3%	8,378	37.0%	29.8%
	Upper	73	38.4%	23,158	44.1%	35.8%	47	42.0%	37.2%	13,963	46.7%	48.8%	26	33.3%	34.0%	9,195	40.6%	51.0%
	Unknown	3	1.6%	167	0.3%	1.6%	2	1.8%	0.9%	121	0.4%	0.6%	1	1.3%	1.1%	46	0.2%	0.6%
	Total	190	100%	52,548	100%	100.0%	112	100%	100%	29,896	100%	100%	78	100%	100%	22,652	100%	100%

Originations &amp; Purchases

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

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

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022						2023					
		Count		Bank Dollar		Families by Family Income %	Count			Dollar			Count			Dollar		
		#	%	\$(000s)	%		Bank #	%	Agg %	Bank \$(000s)	%	Agg %	Bank #	%	Agg %	Bank \$(000s)	%	Agg %
HOME PURCHASE	Low	17	6.0%	2,677	2.5%	21.8%	10	6.3%	6.8%	1,616	3.4%	3.3%	7	5.7%	6.2%	1,061	1.8%	2.9%
	Moderate	54	19.2%	11,050	10.4%	16.7%	34	21.5%	18.8%	6,768	14.3%	12.9%	20	16.3%	19.0%	4,282	7.3%	12.7%
	Middle	41	14.6%	11,106	10.5%	19.6%	27	17.1%	19.7%	7,117	15.1%	18.0%	14	11.4%	21.0%	3,989	6.8%	18.8%
	Upper	162	57.7%	79,612	75.1%	41.8%	83	52.5%	35.1%	31,086	65.8%	47.5%	79	64.2%	35.8%	48,526	82.6%	48.6%
	Unknown	7	2.5%	1,552	1.5%	0.0%	4	2.5%	19.7%	669	1.4%	18.3%	3	2.4%	18.0%	883	1.5%	17.0%
	Total	281	100%	105,997	100%	100.0%	158	100%	100%	47,256	100%	100%	123	100%	100%	58,741	100%	100%
REFINANCE	Low	3	5.2%	227	1.5%	21.8%	2	5.0%	12.4%	135	1.3%	7.0%	1	5.6%	11.0%	92	2.0%	5.9%
	Moderate	4	6.9%	472	3.1%	16.7%	4	10.0%	20.9%	472	4.4%	15.3%	0	0.0%	20.1%	0	0.0%	14.0%
	Middle	13	22.4%	2,625	17.1%	19.6%	10	25.0%	21.5%	1,602	15.0%	19.8%	3	16.7%	21.2%	1,023	21.7%	17.5%
	Upper	27	46.6%	8,435	54.8%	41.8%	16	40.0%	33.4%	5,461	51.1%	45.4%	11	61.1%	34.5%	2,974	63.1%	40.5%
	Unknown	11	19.0%	3,635	23.6%	0.0%	8	20.0%	11.7%	3,011	28.2%	12.5%	3	16.7%	13.3%	624	13.2%	22.1%
	Total	58	100%	15,394	100%	100.0%	40	100%	100%	10,681	100%	100%	18	100%	100%	4,713	100%	100%
HOME IMPROVEMENT	Low	2	11.8%	94	2.8%	21.8%	0	0.0%	6.5%	0	0.0%	3.2%	2	12.5%	8.3%	94	3.9%	3.9%
	Moderate	0	0.0%	0	0.0%	16.7%	0	0.0%	15.4%	0	0.0%	10.0%	0	0.0%	17.3%	0	0.0%	11.0%
	Middle	4	23.5%	277	8.3%	19.6%	0	0.0%	23.0%	0	0.0%	18.8%	4	25.0%	23.5%	277	11.4%	18.7%
	Upper	11	64.7%	2,953	88.8%	41.8%	1	100.0%	52.8%	900	100.0%	64.3%	10	62.5%	48.6%	2,053	84.7%	63.1%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	2.3%	0	0.0%	3.7%	0	0.0%	2.2%	0	0.0%	3.2%
	Total	17	100%	3,324	100%	100.0%	1	100%	100%	900	100%	100%	16	100%	100%	2,424	100%	100%
MULTI FAMILY	Low	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%
	Moderate	0	0.0%	0	0.0%	16.7%	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%	19.6%	0	0.0%	0.3%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	41.8%	0	0.0%	1.4%	0	0.0%	0.2%	0	0.0%	2.2%	0	0.0%	0.2%
	Unknown	2	100.0%	11,935	100.0%	0.0%	1	100.0%	98.4%	10,560	100.0%	99.8%	1	100.0%	97.8%	1,375	100.0%	99.8%
	Total	2	100%	11,935	100%	100.0%	1	100%	100%	10,560	100%	100%	1	100%	100%	1,375	100%	100%
OTHER PURPOSE LOC	Low	4	4.3%	173	1.5%	21.8%	3	3.5%	5.4%	143	1.3%	3.0%	1	14.3%	8.0%	30	3.3%	3.9%
	Moderate	14	15.1%	1,261	10.7%	16.7%	13	15.1%	16.1%	1,231	11.3%	11.3%	1	14.3%	17.9%	30	3.3%	10.5%
	Middle	18	19.4%	1,769	15.0%	19.6%	16	18.6%	23.5%	1,691	15.5%	18.9%	2	28.6%	22.8%	78	8.5%	16.4%
	Upper	51	54.8%	7,555	64.0%	41.8%	48	55.8%	51.0%	6,775	62.2%	63.5%	3	42.9%	47.7%	780	85.0%	66.4%
	Unknown	6	6.5%	1,055	8.9%	0.0%	6	7.0%	3.9%	1,055	9.7%	3.3%	0	0.0%	3.5%	0	0.0%	2.8%
	Total	93	100%	11,613	100%	100.0%	86	100%	100%	10,835	100%	100%	7	100%	100%	918	100%	100%

Originations &amp; Purchases

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

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

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022						2023					
		Count		Bank Dollar		Families by Family Income %	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%	21.8%	0	0.0%	9.4%	0	0.0%	5.5%	0	0.0%	9.7%	0	0.0%	5.8%
	Moderate	0	0.0%	0	0.0%	16.7%	0	0.0%	19.6%	0	0.0%	11.7%	0	0.0%	19.7%	0	0.0%	13.8%
	Middle	0	0.0%	0	0.0%	19.6%	0	0.0%	21.7%	0	0.0%	15.5%	0	0.0%	24.5%	0	0.0%	17.4%
	Upper	0	0.0%	0	0.0%	41.8%	0	0.0%	41.9%	0	0.0%	58.2%	0	0.0%	37.7%	0	0.0%	51.2%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	7.4%	0	0.0%	9.1%	0	0.0%	8.4%	0	0.0%	11.8%
	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%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	21.8%	0	0.0%	1.2%	0	0.0%	0.5%	0	0.0%	1.6%	0	0.0%	1.5%
	Moderate	0	0.0%	0	0.0%	16.7%	0	0.0%	2.0%	0	0.0%	1.7%	0	0.0%	2.2%	0	0.0%	1.0%
	Middle	0	0.0%	0	0.0%	19.6%	0	0.0%	2.5%	0	0.0%	2.2%	0	0.0%	1.1%	0	0.0%	0.3%
	Upper	0	0.0%	0	0.0%	41.8%	0	0.0%	1.5%	0	0.0%	1.1%	0	0.0%	3.3%	0	0.0%	2.5%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	92.8%	0	0.0%	94.5%	0	0.0%	91.8%	0	0.0%	94.7%
	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%
HMDA TOTALS	Low	26	5.8%	3,171	2.1%	21.8%	15	5.2%	8.3%	1,894	2.4%	3.5%	11	6.7%	7.5%	1,277	1.9%	2.9%
	Moderate	72	16.0%	12,783	8.6%	16.7%	51	17.8%	18.6%	8,471	10.6%	10.8%	21	12.7%	18.8%	4,312	6.3%	10.6%
	Middle	76	16.9%	15,777	10.6%	19.6%	53	18.5%	20.6%	10,410	13.0%	14.9%	23	13.9%	21.4%	5,367	7.9%	15.3%
	Upper	251	55.7%	98,555	66.4%	41.8%	148	51.7%	37.2%	44,222	55.1%	39.1%	103	62.4%	37.5%	54,333	79.7%	40.3%
	Unknown	26	5.8%	18,177	12.2%	0.0%	19	6.6%	15.3%	15,295	19.0%	31.8%	7	4.2%	14.8%	2,882	4.2%	30.9%
	Total	451	100%	148,463	100%	100.0%	286	100%	100%	80,232	100%	100%	165	100%	100%	68,171	100%	100%

Originations &amp; Purchases

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



Geographic Distribution of HMDA Loans - Table 1 of 2  
Assessment Area: OH Columbus 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		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg							
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %			
HOME PURCHASE	Low	18	6.4%	2,980	2.8%	5.5%	12	7.6%	7.6%	1,932	4.1%	4.6%	6	4.9%	8.0%	1,048	1.8%	4.8%	
	Moderate	32	11.4%	6,844	6.5%	15.0%	19	12.0%	14.7%	4,234	9.0%	9.7%	13	10.6%	15.3%	2,610	4.4%	10.4%	
	Middle	91	32.4%	25,400	24.0%	35.9%	55	34.8%	36.4%	13,948	29.5%	32.1%	36	29.3%	38.5%	11,452	19.5%	34.7%	
	Upper	136	48.4%	69,785	65.8%	43.3%	71	44.9%	40.6%	27,033	57.2%	52.9%	65	52.8%	37.5%	42,752	72.8%	49.6%	
	Unknown	4	1.4%	988	0.9%	0.3%	1	0.6%	0.7%	109	0.2%	0.6%	3	2.4%	0.7%	879	1.5%	0.5%	
	Total	281	100%	105,997	100%	100.0%	158	100%	100%	47,256	100%	100%	123	100%	100%	58,741	100%	100%	
REFINANCE	Low	5	8.6%	1,802	11.7%	5.5%	4	10.0%	6.5%	1,550	14.5%	4.4%	1	5.6%	7.9%	252	5.3%	5.5%	
	Moderate	3	5.2%	495	3.2%	15.0%	3	7.5%	14.7%	495	4.6%	9.7%	0	0.0%	16.1%	0	0.0%	10.8%	
	Middle	18	31.0%	3,027	19.7%	35.9%	10	25.0%	35.7%	1,890	17.7%	30.3%	8	44.4%	34.6%	1,137	24.1%	28.9%	
	Upper	32	55.2%	10,070	65.4%	43.3%	23	57.5%	42.6%	6,746	63.2%	55.1%	9	50.0%	40.9%	3,324	70.5%	54.3%	
	Unknown	0	0.0%	0	0.0%	0.3%	0	0.0%	0.5%	0	0.0%	0.5%	0	0.0%	0.5%	0	0.0%	0.5%	
	Total	58	100%	15,394	100%	100.0%	40	100%	100%	10,681	100%	100%	18	100%	100%	4,713	100%	100%	
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	5.5%	0	0.0%	3.8%	0	0.0%	2.1%	0	0.0%	4.6%	0	0.0%	2.9%	
	Moderate	2	11.8%	97	2.9%	15.0%	0	0.0%	10.3%	0	0.0%	6.3%	2	12.5%	13.2%	97	4.0%	7.8%	
	Middle	5	29.4%	709	21.3%	35.9%	0	0.0%	30.3%	0	0.0%	23.9%	5	31.3%	32.1%	709	29.2%	26.8%	
	Upper	10	58.8%	2,518	75.8%	43.3%	1	100.0%	55.3%	900	100.0%	67.3%	9	56.3%	49.8%	1,618	66.7%	62.2%	
	Unknown	0	0.0%	0	0.0%	0.3%	0	0.0%	0.3%	0	0.0%	0.3%	0	0.0%	0.3%	0	0.0%	0.2%	
	Total	17	100%	3,324	100%	100.0%	1	100%	100%	900	100%	100%	16	100%	100%	2,424	100%	100%	
MULTI FAMILY	Low	0	0.0%	0	0.0%	Multi-Family Units	0	0.0%	18.3%	0	0.0%	7.5%	0	0.0%	22.0%	0	0.0%	18.2%	
	Moderate	1	50.0%	10,560	88.5%		23.6%	1	100.0%	17.8%	10,560	100.0%	16.8%	0	0.0%	17.0%	0	0.0%	11.8%
	Middle	1	50.0%	1,375	11.5%		32.9%	0	0.0%	41.0%	0	0.0%	45.9%	1	100.0%	30.2%	1,375	100.0%	34.9%
	Upper	0	0.0%	0	0.0%		25.5%	0	0.0%	15.8%	0	0.0%	26.3%	0	0.0%	26.4%	0	0.0%	34.1%
	Unknown	0	0.0%	0	0.0%		2.5%	0	0.0%	7.1%	0	0.0%	3.5%	0	0.0%	4.4%	0	0.0%	0.9%
	Total	2	100%	11,935	100%		100.0%	1	100%	100%	10,560	100%	100%	1	100%	100%	1,375	100%	100%
OTHER PURPOSE LOC	Low	2	2.2%	125	1.1%	5.5%	2	2.3%	2.6%	125	1.1%	1.4%	0	0.0%	3.1%	0	0.0%	1.6%	
	Moderate	4	4.3%	154	1.3%	15.0%	2	2.3%	7.6%	100	0.9%	4.1%	2	28.6%	10.2%	54	5.9%	5.9%	
	Middle	38	40.3%	2,841	24.0%	35.9%	36	41.9%	31.6%	2,757	25.3%	23.3%	2	28.6%	32.2%	84	9.2%	23.7%	
	Upper	49	52.7%	8,693	73.6%	43.3%	46	53.5%	58.0%	7,913	72.6%	71.0%	3	42.9%	54.2%	780	85.0%	68.7%	
	Unknown	0	0.0%	0	0.0%	0.3%	0	0.0%	0.3%	0	0.0%	0.2%	0	0.0%	0.3%	0	0.0%	0.2%	
	Total	93	100%	11,813	100%	100.0%	86	100%	100%	10,835	100%	100%	7	100%	100%	918	100%	100%	

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

Geographic Distribution of HMDA Loans - Table 2 of 2  
Assessment Area: OH Columbus 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		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg						
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	5.5%	0	0.0%	5.4%	0	0.0%	4.0%	0	0.0%	5.8%	0	0.0%	6.1%
	Moderate	0	0.0%	0	0.0%	15.0%	0	0.0%	14.1%	0	0.0%	7.7%	0	0.0%	15.7%	0	0.0%	10.3%
	Middle	0	0.0%	0	0.0%	35.9%	0	0.0%	33.5%	0	0.0%	24.5%	0	0.0%	35.6%	0	0.0%	28.3%
	Upper	0	0.0%	0	0.0%	43.3%	0	0.0%	46.7%	0	0.0%	63.3%	0	0.0%	41.9%	0	0.0%	54.2%
	Unknown	0	0.0%	0	0.0%	0.3%	0	0.0%	0.4%	0	0.0%	0.5%	0	0.0%	0.9%	0	0.0%	1.0%
	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%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	5.5%	0	0.0%	10.9%	0	0.0%	5.6%	0	0.0%	6.0%	0	0.0%	2.5%
	Moderate	0	0.0%	0	0.0%	15.0%	0	0.0%	29.0%	0	0.0%	22.4%	0	0.0%	28.6%	0	0.0%	20.7%
	Middle	0	0.0%	0	0.0%	35.9%	0	0.0%	40.8%	0	0.0%	47.8%	0	0.0%	41.2%	0	0.0%	39.9%
	Upper	0	0.0%	0	0.0%	43.3%	0	0.0%	19.1%	0	0.0%	24.1%	0	0.0%	22.5%	0	0.0%	33.7%
	Unknown	0	0.0%	0	0.0%	0.3%	0	0.0%	0.2%	0	0.0%	0.1%	0	0.0%	1.6%	0	0.0%	3.2%
	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	25	5.5%	4,907	3.3%	5.5%	18	6.3%	6.6%	3,607	4.5%	4.9%	7	4.2%	7.3%	1,300	1.9%	7.0%
	Moderate	42	9.3%	18,150	12.2%	15.0%	25	8.7%	13.9%	15,389	19.2%	10.8%	17	10.3%	15.0%	2,761	4.1%	10.5%
	Middle	153	33.9%	33,352	22.5%	35.9%	101	35.3%	35.2%	18,595	23.2%	33.8%	52	31.5%	36.5%	14,757	21.6%	33.4%
	Upper	227	50.3%	91,066	61.3%	43.3%	141	49.3%	43.7%	42,592	53.0%	49.3%	86	52.1%	40.6%	48,474	71.1%	48.5%
	Unknown	4	0.9%	988	0.7%	0.3%	1	0.3%	0.6%	109	0.1%	1.1%	3	1.8%	0.6%	879	1.3%	0.6%
	Total	451	100%	148,463	100%	100.0%	286	100%	100%	80,292	100%	100%	165	100%	100%	68,171	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: OH Dayton 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	1	4.2%	210	3.4%	24.6%	1	8.3%	11.4%	210	7.2%	6.4%	0	0.0%	10.9%	0	0.0%	5.9%
	Moderate	6	25.0%	878	14.2%	17.4%	2	16.7%	21.5%	400	13.8%	16.8%	4	33.3%	21.8%	478	14.6%	17.1%
	Middle	6	25.0%	1,299	21.0%	20.9%	4	33.3%	21.6%	787	27.1%	21.3%	2	16.7%	22.0%	512	15.7%	22.3%
	Upper	10	41.7%	3,694	59.8%	37.2%	4	33.3%	26.7%	1,414	48.6%	37.4%	6	50.0%	23.9%	2,280	69.7%	34.1%
	Unknown	1	4.2%	96	1.6%	0.0%	1	8.3%	18.8%	96	3.3%	18.1%	0	0.0%	21.3%	0	0.0%	20.6%
	Total	24	100%	6,177	100%	100.0%	12	100%	100%	2,907	100%	100%	12	100%	100%	3,270	100%	100%
REFINANCE	Low	0	0.0%	0	0.0%	24.6%	0	0.0%	14.3%	0	0.0%	8.7%	0	0.0%	16.3%	0	0.0%	10.0%
	Moderate	2	16.7%	213	9.2%	17.4%	1	14.3%	24.2%	85	8.9%	19.5%	1	20.0%	22.4%	128	9.4%	18.3%
	Middle	1	8.3%	50	2.1%	20.9%	1	14.3%	24.0%	50	5.2%	23.2%	0	0.0%	22.2%	0	0.0%	22.8%
	Upper	7	58.3%	1,784	76.7%	37.2%	3	42.9%	26.5%	545	56.8%	34.7%	4	80.0%	24.9%	1,239	90.6%	31.6%
	Unknown	2	16.7%	280	12.0%	0.0%	2	28.6%	10.9%	280	29.2%	14.0%	0	0.0%	14.1%	0	0.0%	17.4%
	Total	12	100%	2,327	100%	100.0%	7	100%	100%	960	100%	100%	5	100%	100%	1,367	100%	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	24.6%	0	0.0%	12.2%	0	0.0%	8.2%	0	0.0%	15.0%	0	0.0%	10.2%
	Moderate	1	50.0%	189	51.9%	17.4%	0	0.0%	23.2%	0	0.0%	17.4%	1	100.0%	23.2%	189	100.0%	19.1%
	Middle	0	0.0%	0	0.0%	20.9%	0	0.0%	25.5%	0	0.0%	22.8%	0	0.0%	26.4%	0	0.0%	24.5%
	Upper	1	50.0%	175	48.1%	37.2%	1	100.0%	37.8%	175	100.0%	50.1%	0	0.0%	34.1%	0	0.0%	45.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	1.4%	0	0.0%	1.5%	0	0.0%	1.3%	0	0.0%	1.3%
	Total	2	100%	364	100%	100.0%	1	100%	100%	175	100%	100%	1	100%	100%	189	100%	100%
MULTI FAMILY	Low	0	0.0%	0	0.0%	24.6%	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%	20.9%	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%	37.2%	0	0.0%	3.6%	0	0.0%	0.5%	0	0.0%	5.1%	0	0.0%	0.9%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	96.4%	0	0.0%	99.5%	0	0.0%	94.9%	0	0.0%	99.1%
	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%
OTHER PURPOSE LOC	Low	2	15.4%	41	3.1%	24.6%	1	14.3%	14.0%	30	4.3%	8.2%	1	16.7%	13.7%	11	1.7%	8.2%
	Moderate	3	23.1%	428	32.1%	17.4%	1	14.3%	20.7%	188	26.9%	15.5%	2	33.3%	22.3%	240	37.7%	16.4%
	Middle	3	23.1%	269	20.1%	20.9%	2	28.6%	25.8%	229	32.8%	20.5%	1	16.7%	25.0%	40	6.3%	18.2%
	Upper	4	30.8%	492	36.9%	37.2%	2	28.6%	36.8%	147	21.0%	52.1%	2	33.3%	34.8%	345	54.2%	54.1%
	Unknown	1	7.7%	105	7.9%	0.0%	1	14.3%	2.7%	105	15.0%	3.6%	0	0.0%	4.3%	0	0.0%	3.2%
	Total	13	100%	1,335	100%	100.0%	7	100%	100%	639	100%	100%	6	100%	100%	636	100%	100%

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

Borrower Distribution of HMDA Loans - Table 2 of 2  
Assessment Area: OH Dayton 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)	\$%										%	#	%	%
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	24.6%	0	0.0%	11.3%	0	0.0%	8.3%	0	0.0%	13.6%	0	0.0%	9.6%
	Moderate	0	0.0%	0	0.0%	17.4%	0	0.0%	22.8%	0	0.0%	16.0%	0	0.0%	22.7%	0	0.0%	17.4%
	Middle	0	0.0%	0	0.0%	20.9%	0	0.0%	26.3%	0	0.0%	20.1%	0	0.0%	25.4%	0	0.0%	21.1%
	Upper	0	0.0%	0	0.0%	37.2%	0	0.0%	36.0%	0	0.0%	50.4%	0	0.0%	35.0%	0	0.0%	47.1%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	3.8%	0	0.0%	5.3%	0	0.0%	3.3%	0	0.0%	4.8%
	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%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	24.6%	0	0.0%	1.7%	0	0.0%	0.9%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	17.4%	0	0.0%	0.6%	0	0.0%	0.5%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	20.9%	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%	37.2%	0	0.0%	0.6%	0	0.0%	0.5%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	97.1%	0	0.0%	98.2%	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	5.9%	251	2.5%	24.6%	2	7.4%	12.2%	240	5.1%	5.7%	1	4.2%	12.3%	11	0.2%	6.0%
	Moderate	12	23.5%	1,708	16.7%	17.4%	4	14.8%	22.0%	673	14.2%	14.0%	8	33.3%	21.9%	1,035	18.9%	15.5%
	Middle	10	19.6%	1,618	15.9%	20.9%	7	25.9%	22.6%	1,066	22.5%	17.5%	3	12.5%	22.6%	552	10.1%	20.0%
	Upper	22	43.1%	6,145	60.2%	37.2%	10	37.0%	28.2%	2,281	48.1%	30.4%	12	50.0%	26.0%	3,864	70.7%	31.3%
	Unknown	4	7.8%	481	4.7%	0.0%	4	14.8%	15.1%	481	10.1%	32.3%	0	0.0%	17.2%	0	0.0%	27.2%
	Total	51	100%	10,203	100%	100.0%	27	100%	100%	4,741	100%	100%	24	100%	100%	5,462	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: OH Dayton 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				Bank	Agg	%	Bank	Agg	%	Bank	Agg	%	Bank	Agg	
			\$ (000s)	\$ %	%													\$ (000s)
HOME PURCHASE	Low	1	4.2%	395	6.4%	7.5%	1	8.3%	5.9%	395	13.6%	3.2%	0	0.0%	7.3%	0	0.0%	4.1%
	Moderate	3	12.5%	221	3.6%	19.7%	1	8.3%	19.8%	75	2.6%	13.7%	2	16.7%	22.1%	146	4.5%	16.0%
	Middle	5	20.8%	920	14.9%	45.4%	3	25.0%	46.4%	646	22.2%	43.4%	2	16.7%	45.7%	274	8.4%	44.8%
	Upper	14	58.3%	4,545	73.6%	27.0%	6	50.0%	27.6%	1,695	58.3%	39.6%	8	66.7%	24.8%	2,850	87.2%	35.1%
	Unknown	1	4.2%	96	1.6%	0.4%	1	8.3%	0.2%	96	3.3%	0.2%	0	0.0%	0.2%	0	0.0%	0.1%
	Total	24	100%	6,177	100%	100.0%	12	100%	100%	2,907	100%	100%	12	100%	100%	3,270	100%	100%
REFINANCE	Low	2	16.7%	143	6.1%	7.5%	1	14.3%	4.1%	98	10.2%	3.2%	1	20.0%	5.8%	45	3.3%	4.2%
	Moderate	0	0.0%	0	0.0%	19.7%	0	0.0%	16.8%	0	0.0%	12.5%	0	0.0%	18.3%	0	0.0%	14.7%
	Middle	4	33.3%	449	19.3%	45.4%	2	28.6%	50.1%	135	14.1%	45.8%	2	40.0%	48.2%	314	23.0%	45.3%
	Upper	6	50.0%	1,735	74.6%	27.0%	4	57.1%	28.7%	727	75.7%	38.1%	2	40.0%	27.2%	1,008	73.7%	35.6%
	Unknown	0	0.0%	0	0.0%	0.4%	0	0.0%	0.3%	0	0.0%	0.3%	0	0.0%	0.5%	0	0.0%	0.3%
	Total	12	100%	2,327	100%	100.0%	7	100%	100%	960	100%	100%	5	100%	100%	1,367	100%	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	7.5%	0	0.0%	4.4%	0	0.0%	2.7%	0	0.0%	7.2%	0	0.0%	3.9%
	Moderate	0	0.0%	0	0.0%	19.7%	0	0.0%	16.2%	0	0.0%	12.0%	0	0.0%	18.1%	0	0.0%	13.4%
	Middle	1	50.0%	189	51.9%	45.4%	0	0.0%	44.6%	0	0.0%	40.1%	1	100.0%	45.3%	189	100.0%	42.9%
	Upper	1	50.0%	175	48.1%	27.0%	1	100.0%	34.3%	175	100.0%	45.0%	0	0.0%	29.1%	0	0.0%	39.5%
	Unknown	0	0.0%	0	0.0%	0.4%	0	0.0%	0.5%	0	0.0%	0.2%	0	0.0%	0.4%	0	0.0%	0.3%
	Total	2	100%	364	100%	100.0%	1	100%	100%	175	100%	100%	1	100%	100%	189	100%	100%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	0	0.0%	13.4%	0	0.0%	21.8%	0	0.0%	2.5%	0	0.0%	23.1%	0	0.0%	7.0%
	Moderate	0	0.0%	0	0.0%	33.0%	0	0.0%	35.5%	0	0.0%	40.1%	0	0.0%	26.9%	0	0.0%	17.0%
	Middle	0	0.0%	0	0.0%	32.2%	0	0.0%	32.7%	0	0.0%	49.7%	0	0.0%	33.3%	0	0.0%	47.0%
	Upper	0	0.0%	0	0.0%	20.1%	0	0.0%	9.1%	0	0.0%	4.7%	0	0.0%	16.7%	0	0.0%	29.0%
	Unknown	0	0.0%	0	0.0%	1.4%	0	0.0%	0.9%	0	0.0%	3.1%	0	0.0%	0.0%	0	0.0%	0.0%
Total	0	0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	7.5%	0	0.0%	2.4%	0	0.0%	1.4%	0	0.0%	3.9%	0	0.0%	1.9%
	Moderate	0	0.0%	0	0.0%	19.7%	0	0.0%	11.6%	0	0.0%	7.4%	0	0.0%	15.1%	0	0.0%	9.2%
	Middle	7	53.8%	515	38.6%	45.4%	4	57.1%	51.6%	264	37.8%	44.0%	3	50.0%	44.1%	251	39.5%	35.1%
	Upper	6	46.2%	820	61.4%	27.0%	3	42.9%	34.3%	435	62.2%	47.2%	3	50.0%	36.7%	385	60.5%	53.7%
	Unknown	0	0.0%	0	0.0%	0.4%	0	0.0%	0.1%	0	0.0%	0.0%	0	0.0%	0.2%	0	0.0%	0.1%
	Total	13	100%	1,335	100%	100.0%	7	100%	100%	639	100%	100%	6	100%	100%	636	100%	100%

Originations & Purchases  
Based on 2023 FFIEC Census Data; 2016-2020 ACS dataGeographic Distribution of HMDA Loans - Table 2 of 2  
Assessment Area: OH Dayton 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			Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
		#	%	\$ (000s)	\$ %										#	%	%	\$ (000s)
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	7.5%	0	0.0%	4.5%	0	0.0%	3.8%	0	0.0%	4.9%	0	0.0%	3.8%
	Moderate	0	0.0%	0	0.0%	19.7%	0	0.0%	19.8%	0	0.0%	12.9%	0	0.0%	14.6%	0	0.0%	12.3%
	Middle	0	0.0%	0	0.0%	45.4%	0	0.0%	45.3%	0	0.0%	39.3%	0	0.0%	50.5%	0	0.0%	43.9%
	Upper	0	0.0%	0	0.0%	27.0%	0	0.0%	30.5%	0	0.0%	44.0%	0	0.0%	29.5%	0	0.0%	39.7%
	Unknown	0	0.0%	0	0.0%	0.4%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.6%	0	0.0%	0.2%
		0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%
	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%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	7.5%	0	0.0%	11.6%	0	0.0%	7.6%	0	0.0%	9.3%	0	0.0%	4.8%
	Moderate	0	0.0%	0	0.0%	19.7%	0	0.0%	28.9%	0	0.0%	19.7%	0	0.0%	25.9%	0	0.0%	18.2%
	Middle	0	0.0%	0	0.0%	45.4%	0	0.0%	43.4%	0	0.0%	49.5%	0	0.0%	48.1%	0	0.0%	56.7%
	Upper	0	0.0%	0	0.0%	27.0%	0	0.0%	15.6%	0	0.0%	22.7%	0	0.0%	16.7%	0	0.0%	20.4%
	Unknown	0	0.0%	0	0.0%	0.4%	0	0.0%	0.6%	0	0.0%	0.5%	0	0.0%	0.0%	0	0.0%	0.0%
		0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%
	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	5.9%	538	5.3%	7.5%	2	7.4%	5.2%	493	10.4%	3.0%	1	4.2%	6.9%	45	0.8%	4.3%
	Moderate	3	5.9%	221	2.2%	19.7%	1	3.7%	18.4%	75	1.6%	18.4%	2	8.3%	20.4%	146	2.7%	15.6%
	Middle	17	33.3%	2,073	20.3%	45.4%	9	33.3%	47.3%	1,045	22.0%	45.0%	8	33.3%	46.1%	1,028	18.8%	44.8%
	Upper	27	52.9%	7,275	71.3%	27.0%	14	51.9%	28.8%	3,032	64.0%	32.9%	13	54.2%	26.3%	4,243	77.7%	35.1%
	Unknown	1	2.0%	96	0.9%	0.4%	1	3.7%	0.3%	96	2.0%	0.7%	0	0.0%	0.3%	0	0.0%	0.1%
		51	100%	10,203	100%	100.0%	27	100%	100%	4,741	100%	100%	24	100%	100%	5,462	100%	100%
	Total	51	100%	10,203	100%	100.0%	27	100%	100%	4,741	100%	100%	24	100%	100%	5,462	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: OH Mansfield 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			
		#	%	\$ (000s)		Bank	Agg	\$ (000s)	\$ %	\$ %	Bank	%	Agg	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	5	19.2%	333	8.4%	20.5%	4	21.1%	7.9%	283	10.1%	4.3%	1	14.3%	7.4%	50	4.4%	4.0%
	Moderate	15	57.7%	1,833	46.5%	17.1%	10	52.6%	23.2%	1,383	49.3%	17.1%	5	71.4%	26.1%	450	39.5%	18.6%
	Middle	2	7.7%	287	7.3%	22.6%	2	10.5%	23.3%	287	10.2%	23.1%	0	0.0%	25.3%	0	0.0%	24.0%
	Upper	4	15.4%	1,492	37.8%	39.8%	3	15.8%	26.9%	854	30.4%	39.0%	1	14.3%	28.0%	638	56.1%	39.9%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	18.6%	0	0.0%	16.5%	0	0.0%	13.2%	0	0.0%	13.6%
	Total	26	100%	3,945	100%	100.0%	19	100%	100%	2,807	100%	100%	7	100%	100%	1,138	100%	100%
REFINANCE	Low	4	20.0%	218	12.7%	20.5%	4	26.7%	12.3%	218	15.9%	7.9%	0	0.0%	10.1%	0	0.0%	5.4%
	Moderate	3	15.0%	181	10.5%	17.1%	2	13.3%	20.3%	161	11.7%	15.6%	1	20.0%	18.1%	20	5.7%	12.8%
	Middle	5	25.0%	360	20.9%	22.6%	3	20.0%	25.8%	225	16.4%	23.3%	2	40.0%	23.3%	135	38.8%	21.1%
	Upper	8	40.0%	963	55.9%	39.8%	6	40.0%	30.4%	770	56.0%	41.3%	2	40.0%	35.5%	193	55.5%	45.8%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	11.1%	0	0.0%	12.0%	0	0.0%	13.0%	0	0.0%	14.9%
	Total	20	100%	1,722	100%	100.0%	15	100%	100%	1,374	100%	100%	5	100%	100%	348	100%	100%
HOME IMPROVEMENT	Low	1	16.7%	36	14.1%	20.5%	0	0.0%	8.9%	0	0.0%	7.0%	1	16.7%	8.9%	36	14.1%	4.6%
	Moderate	2	33.3%	79	31.0%	17.1%	0	0.0%	19.5%	0	0.0%	15.7%	2	33.3%	19.3%	79	31.0%	15.6%
	Middle	1	16.7%	10	3.9%	22.6%	0	0.0%	27.2%	0	0.0%	24.2%	1	16.7%	26.1%	10	3.9%	19.8%
	Upper	1	16.7%	100	39.2%	39.8%	0	0.0%	40.6%	0	0.0%	48.4%	1	16.7%	39.6%	100	39.2%	48.0%
	Unknown	1	16.7%	30	11.8%	0.0%	0	0.0%	3.8%	0	0.0%	4.8%	1	16.7%	6.1%	30	11.8%	11.9%
	Total	6	100%	255	100%	100.0%	0	0.0%	100%	0	0.0%	100%	6	100%	100%	255	100%	100%
MULTI FAMILY	Low	0	0.0%	0	0.0%	20.5%	0	0.0%	4.5%	0	0.0%	1.2%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	17.1%	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%	22.6%	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%	39.8%	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%	95.5%	0	0.0%	98.8%	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%
OTHER PURPOSE LOC	Low	3	15.8%	202	19.5%	20.5%	2	14.3%	8.2%	100	14.5%	8.0%	1	20.0%	9.4%	102	29.4%	6.0%
	Moderate	5	26.3%	165	15.9%	17.1%	2	14.3%	17.7%	20	2.9%	11.2%	3	60.0%	20.3%	145	41.8%	15.8%
	Middle	2	10.5%	124	12.0%	22.6%	1	7.1%	26.5%	24	3.5%	21.1%	1	20.0%	21.9%	100	28.8%	19.6%
	Upper	6	31.6%	430	41.5%	39.8%	6	42.9%	40.1%	430	62.4%	54.4%	0	0.0%	39.8%	0	0.0%	53.1%
	Unknown	3	15.8%	115	11.1%	0.0%	3	21.4%	7.5%	115	16.7%	5.4%	0	0.0%	8.6%	0	0.0%	5.5%
	Total	19	100%	1,036	100%	100.0%	14	100%	100%	689	100%	100%	5	100%	100%	347	100%	100%

Originations &amp; Purchases

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

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

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022					2023						
		Bank		Dollar		Families by Family Income	Count		Dollar			Count		Dollar				
		Count						Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg			
#	%	\$(000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	20.5%	0	0.0%	16.7%	0	0.0%	11.2%	0	0.0%	12.5%	0	0.0%	10.1%
	Moderate	0	0.0%	0	0.0%	17.1%	0	0.0%	27.8%	0	0.0%	17.7%	0	0.0%	22.7%	0	0.0%	15.4%
	Middle	0	0.0%	0	0.0%	22.6%	0	0.0%	25.0%	0	0.0%	19.3%	0	0.0%	28.4%	0	0.0%	29.4%
	Upper	0	0.0%	0	0.0%	39.8%	0	0.0%	29.2%	0	0.0%	50.9%	0	0.0%	33.0%	0	0.0%	38.7%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	1.4%	0	0.0%	1.0%	0	0.0%	3.4%	0	0.0%	6.4%
	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%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	20.5%	0	0.0%	5.0%	0	0.0%	7.2%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	17.1%	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%	22.6%	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%	39.8%	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%	95.0%	0	0.0%	92.8%	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	13	18.3%	789	11.3%	20.5%	10	20.8%	9.4%	601	12.3%	5.4%	3	13.0%	8.4%	188	9.0%	4.1%
	Moderate	25	35.2%	2,258	32.5%	17.1%	14	29.2%	21.6%	1,564	32.1%	15.9%	11	47.8%	23.1%	694	33.2%	16.1%
	Middle	10	14.1%	781	11.2%	22.6%	6	12.5%	24.3%	536	11.0%	22.2%	4	17.4%	24.7%	245	11.7%	21.7%
	Upper	19	26.8%	2,985	42.9%	39.8%	15	31.3%	29.5%	2,054	42.2%	38.8%	4	17.4%	31.4%	931	44.6%	38.8%
	Unknown	4	5.6%	145	2.1%	0.0%	3	6.3%	15.2%	115	2.4%	17.7%	1	4.3%	12.5%	30	1.4%	19.3%
	Total	71	100%	6,958	100%	100.0%	48	100%	100%	4,870	100%	100%	23	100%	100%	2,088	100%	100%

Originations &amp; Purchases

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

Geographic Distribution of HMDA Loans - Table 1 of 2  
Assessment Area: OH Mansfield 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			Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	\$%	%	#	%									%	\$ (000s)	\$%	\$%
HOME PURCHASE	Low	4	15.4%	431	10.9%	6.9%	4	21.1%	7.6%	431	15.4%	4.6%	0	0.0%	8.5%	0	0.0%	5.4%
	Moderate	0	0.0%	0	0.0%	9.1%	0	0.0%	12.1%	0	0.0%	6.4%	0	0.0%	11.0%	0	0.0%	6.4%
	Middle	13	50.0%	1,684	42.7%	55.1%	11	57.9%	51.2%	1,573	56.0%	52.8%	2	28.6%	50.6%	111	9.8%	53.0%
	Upper	9	34.6%	1,830	46.4%	28.9%	4	21.1%	29.1%	803	28.6%	36.3%	5	71.4%	29.8%	1,027	90.2%	35.2%
	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	0.0%	0.0%
	Total	26	100%	3,945	100%	100.0%	19	100%	100%	2,807	100%	100%	7	100%	100%	1,138	100%	100%
REFINANCE	Low	0	0.0%	0	0.0%	6.9%	0	0.0%	5.7%	0	0.0%	3.2%	0	0.0%	6.6%	0	0.0%	4.7%
	Moderate	0	0.0%	0	0.0%	9.1%	0	0.0%	7.6%	0	0.0%	4.5%	0	0.0%	8.8%	0	0.0%	5.8%
	Middle	13	65.0%	1,099	63.8%	55.1%	11	73.3%	56.0%	994	72.3%	56.2%	2	40.0%	58.1%	105	30.2%	60.4%
	Upper	7	35.0%	623	36.2%	28.9%	4	26.7%	30.7%	380	27.7%	36.1%	3	60.0%	26.4%	243	69.8%	29.1%
	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	20	100%	1,722	100%	100.0%	15	100%	100%	1,374	100%	100%	5	100%	100%	348	100%	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	6.9%	0	0.0%	4.8%	0	0.0%	3.7%	0	0.0%	4.3%	0	0.0%	3.4%
	Moderate	0	0.0%	0	0.0%	9.1%	0	0.0%	6.4%	0	0.0%	5.3%	0	0.0%	7.5%	0	0.0%	5.9%
	Middle	4	66.7%	106	41.6%	55.1%	0	0.0%	54.0%	0	0.0%	52.3%	4	66.7%	57.9%	106	41.6%	57.7%
	Upper	2	33.3%	149	58.4%	28.9%	0	0.0%	34.8%	0	0.0%	38.7%	2	33.3%	30.4%	149	58.4%	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	6	100%	255	100%	100.0%	0	0.0%	100%	0	0.0%	100%	6	100%	100%	255	100%	100%
MULTI FAMILY	Low	0	0.0%	Multi-Family Units			0	0.0%	4.5%	0	0.0%	1.9%	0	0.0%	6.7%	0	0.0%	21.1%
	Moderate	0	0.0%	0	0.0%	22.7%	0	0.0%	22.7%	0	0.0%	44.0%	0	0.0%	20.0%	0	0.0%	13.2%
	Middle	0	0.0%	0	0.0%	38.8%	0	0.0%	54.5%	0	0.0%	44.3%	0	0.0%	40.0%	0	0.0%	26.3%
	Upper	0	0.0%	0	0.0%	14.8%	0	0.0%	18.2%	0	0.0%	9.7%	0	0.0%	33.3%	0	0.0%	39.4%
	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%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	6.9%	0	0.0%	4.8%	0	0.0%	3.2%	0	0.0%	3.1%	0	0.0%	1.8%
	Moderate	0	0.0%	0	0.0%	9.1%	0	0.0%	6.1%	0	0.0%	5.0%	0	0.0%	4.7%	0	0.0%	3.0%
	Middle	11	57.9%	417	40.3%	55.1%	8	57.1%	53.1%	245	35.6%	51.3%	3	60.0%	57.8%	172	49.6%	59.8%
	Upper	8	42.1%	619	53.7%	28.9%	6	42.9%	36.1%	444	64.4%	40.6%	2	40.0%	34.4%	175	50.4%	35.3%
	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	19	100%	1,036	100%	100.0%	14	100%	100%	689	100%	100%	5	100%	100%	347	100%	100%

Originations &amp; Purchases

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

Geographic Distribution of HMDA Loans - Table 2 of 2  
Assessment Area: OH Mansfield 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			Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$(000s)	\$%	%	#	%									%	\$(000s)	\$%	\$%
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	6.9%	0	0.0%	4.2%	0	0.0%	1.8%	0	0.0%	9.1%	0	0.0%	7.9%
	Moderate	0	0.0%	0	0.0%	9.1%	0	0.0%	6.9%	0	0.0%	2.4%	0	0.0%	8.0%	0	0.0%	5.4%
	Middle	0	0.0%	0	0.0%	55.1%	0	0.0%	51.4%	0	0.0%	55.5%	0	0.0%	47.7%	0	0.0%	51.5%
	Upper	0	0.0%	0	0.0%	28.9%	0	0.0%	37.5%	0	0.0%	40.3%	0	0.0%	35.2%	0	0.0%	35.3%
	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%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	6.9%	0	0.0%	15.0%	0	0.0%	8.4%	0	0.0%	37.5%	0	0.0%	38.1%
	Moderate	0	0.0%	0	0.0%	9.1%	0	0.0%	20.0%	0	0.0%	11.9%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	55.1%	0	0.0%	40.0%	0	0.0%	35.7%	0	0.0%	37.5%	0	0.0%	46.1%
	Upper	0	0.0%	0	0.0%	28.9%	0	0.0%	25.0%	0	0.0%	44.0%	0	0.0%	25.0%	0	0.0%	15.8%
	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	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	5.6%	431	6.2%	6.9%	4	8.3%	6.6%	431	8.9%	4.0%	0	0.0%	7.5%	0	0.0%	6.2%
	Moderate	0	0.0%	0	0.0%	9.1%	0	0.0%	10.0%	0	0.0%	7.2%	0	0.0%	9.7%	0	0.0%	6.6%
	Middle	41	57.7%	3,306	47.5%	55.1%	30	62.5%	52.9%	2,812	57.7%	53.3%	11	47.8%	53.1%	494	23.7%	52.8%
	Upper	26	36.6%	3,221	46.3%	28.9%	14	29.2%	30.5%	1,627	33.4%	35.5%	12	52.2%	29.7%	1,594	76.3%	34.3%
	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	71	100%	6,958	100%	100.0%	48	100%	100%	4,870	100%	100%	23	100%	100%	2,088	100%	100%

Originations &amp; Purchases

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

Borrower Distribution of HMDA Loans - Table 1 of 2  
Assessment Area: Nonmetropolitan Indiana

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	8	18.6%	867	12.0%	16.6%	6	20.7%	9.5%	626	12.3%	5.4%	2	14.3%	6.7%	241	11.4%	4.2%
	Moderate	14	32.6%	2,093	29.0%	15.3%	9	31.0%	26.4%	1,413	27.7%	20.3%	5	35.7%	30.9%	680	32.3%	22.9%
	Middle	11	25.6%	1,642	22.8%	22.2%	6	20.7%	25.9%	1,024	20.1%	25.7%	5	35.7%	26.1%	618	29.3%	26.8%
	Upper	10	23.3%	2,605	36.1%	46.0%	8	27.6%	22.5%	2,037	39.9%	33.0%	2	14.3%	20.2%	568	27.0%	30.7%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	15.6%	0	0.0%	15.6%	0	0.0%	16.0%	0	0.0%	15.4%
	Total	43	100%	7,207	100%	100.0%	29	100%	100%	5,100	100%	100%	14	100%	100%	2,107	100%	100%
REFINANCE	Low	11	23.4%	681	13.5%	16.6%	6	17.1%	13.2%	313	7.5%	6.8%	5	41.7%	15.7%	368	42.0%	10.2%
	Moderate	11	23.4%	1,022	20.3%	15.3%	9	25.7%	21.4%	876	21.1%	16.9%	2	16.7%	20.9%	146	16.7%	15.0%
	Middle	13	27.7%	1,480	29.4%	22.2%	9	25.7%	33.2%	1,245	29.9%	33.6%	4	33.3%	24.2%	235	26.8%	21.1%
	Upper	9	19.1%	1,752	34.8%	46.0%	8	22.9%	26.4%	1,625	39.1%	37.4%	1	8.3%	26.8%	127	14.5%	38.5%
	Unknown	3	6.4%	102	2.0%	0.0%	3	8.6%	5.7%	102	2.5%	5.3%	0	0.0%	12.4%	0	0.0%	15.2%
	Total	47	100%	5,037	100%	100.0%	35	100%	100%	4,161	100%	100%	12	100%	100%	676	100%	100%
HOME IMPROVEMENT	Low	3	23.1%	170	26.3%	16.6%	1	100.0%	12.8%	83	100.0%	11.3%	2	16.7%	11.5%	87	15.4%	10.0%
	Moderate	3	23.1%	80	12.4%	15.3%	0	0.0%	12.8%	0	0.0%	6.5%	3	25.0%	21.2%	80	14.2%	17.0%
	Middle	5	38.5%	199	30.8%	22.2%	0	0.0%	27.7%	0	0.0%	18.4%	5	41.7%	26.9%	199	35.3%	23.0%
	Upper	2	15.4%	198	30.6%	46.0%	0	0.0%	42.6%	0	0.0%	56.5%	2	16.7%	40.4%	198	35.1%	50.1%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	4.3%	0	0.0%	7.2%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	13	100%	647	100%	100.0%	1	100%	100%	83	100%	100%	12	100%	100%	564	100%	100%
MULTI FAMILY	Low	0	0.0%	0	0.0%	16.6%	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%	15.3%	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%	22.2%	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%	46.0%	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%	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%	0.0%	0	0.0%	0.0%
OTHER PURPOSE LOC	Low	12	20.7%	633	13.5%	16.6%	6	17.6%	14.7%	389	14.6%	11.8%	6	25.0%	21.3%	244	12.1%	11.4%
	Moderate	12	20.7%	541	11.6%	15.3%	6	17.6%	19.1%	336	12.6%	14.8%	6	25.0%	23.4%	205	10.2%	14.3%
	Middle	16	27.6%	1,189	25.4%	22.2%	12	35.3%	30.9%	964	36.2%	32.3%	4	16.7%	27.7%	225	11.2%	21.2%
	Upper	16	27.6%	2,104	45.0%	46.0%	9	26.5%	33.8%	812	30.5%	38.2%	7	29.2%	25.5%	1,292	64.1%	51.8%
	Unknown	2	3.4%	211	4.5%	0.0%	1	2.9%	1.5%	161	6.0%	2.9%	1	4.2%	2.1%	50	2.5%	1.3%
	Total	58	100%	4,678	100%	100.0%	34	100%	100%	2,662	100%	100%	24	100%	100%	2,016	100%	100%

Originations &amp; Purchases

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

Borrower Distribution of HMDA Loans - Table 2 of 2  
Assessment Area: Nonmetropolitan Indiana

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		Agg
		Count	Dollar		Bank		Agg	Bank	Agg	Bank	Agg	Bank	Agg					
#	%	\$(000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	16.6%	0	0.0%	4.0%	0	0.0%	1.7%	0	0.0%	15.6%	0	0.0%	10.0%
	Moderate	0	0.0%	0	0.0%	15.3%	0	0.0%	20.0%	0	0.0%	36.7%	0	0.0%	12.5%	0	0.0%	6.6%
	Middle	0	0.0%	0	0.0%	22.2%	0	0.0%	44.0%	0	0.0%	27.7%	0	0.0%	31.3%	0	0.0%	22.1%
	Upper	0	0.0%	0	0.0%	46.0%	0	0.0%	28.0%	0	0.0%	32.8%	0	0.0%	34.4%	0	0.0%	58.5%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	4.0%	0	0.0%	1.2%	0	0.0%	6.3%	0	0.0%	2.8%
	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%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	16.6%	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%	15.3%	0	0.0%	16.7%	0	0.0%	13.7%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	22.2%	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%	46.0%	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%	83.3%	0	0.0%	86.3%	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	34	21.1%	2,351	13.4%	16.6%	19	19.2%	11.1%	1,411	11.8%	6.1%	15	24.2%	10.8%	940	16.9%	6.1%
	Moderate	40	24.8%	3,736	21.3%	15.3%	24	24.2%	23.1%	2,625	21.9%	18.9%	16	25.8%	26.2%	1,111	20.0%	20.3%
	Middle	45	28.0%	4,510	25.7%	22.2%	27	27.3%	29.2%	3,233	26.9%	28.2%	18	29.0%	26.1%	1,277	23.0%	25.1%
	Upper	37	23.0%	6,659	37.9%	46.0%	25	25.3%	25.8%	4,474	37.3%	35.0%	12	19.4%	24.5%	2,185	39.3%	34.5%
	Unknown	5	3.1%	313	1.8%	0.0%	4	4.0%	10.8%	263	2.2%	11.8%	1	1.6%	12.5%	50	0.9%	14.1%
	Total	161	100%	17,569	100%	100.0%	99	100%	100%	12,006	100%	100%	62	100%	100%	5,563	100%	100%

Originations &amp; Purchases

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

Geographic Distribution of HMDA Loans - Table 1 of 2  
Assessment Area: Nonmetropolitan Indiana

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	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	6	14.0%	780	10.8%	43.9%	5	17.2%	39.1%	747	14.6%	37.3%	1	7.1%	37.9%	33	1.6%	36.6%
	Upper	37	86.0%	6,427	89.2%	56.1%	24	82.8%	60.9%	4,353	85.4%	62.7%	13	92.9%	62.1%	2,074	98.4%	63.4%
	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	43	100%	7,207	100%	100.0%	29	100%	100%	5,100	100%	100%	14	100%	100%	2,107	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	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	18	38.3%	2,252	44.7%	43.9%	14	40.0%	42.1%	1,890	45.4%	39.2%	4	33.3%	44.4%	362	41.3%	44.3%
	Upper	29	61.7%	2,785	55.3%	56.1%	21	60.0%	57.9%	2,271	54.6%	60.8%	8	66.7%	55.6%	514	58.7%	55.7%
	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	47	100%	5,037	100%	100.0%	35	100%	100%	4,161	100%	100%	12	100%	100%	876	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	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	3	23.1%	122	18.9%	43.9%	0	0.0%	40.4%	0	0.0%	38.3%	3	25.0%	42.3%	122	21.6%	38.9%
	Upper	10	76.9%	525	81.1%	56.1%	1	100.0%	59.6%	83	100.0%	61.7%	9	75.0%	57.7%	442	78.4%	61.1%
	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	13	100%	647	100%	100.0%	1	100%	100%	83	100%	100%	12	100%	100%	564	100%	100%
MULTI FAMILY	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	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	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	33.9%	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%	66.1%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	0.0%	0	0.0%	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	0.0%	0.0%
	Total	0	0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	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	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	18	31.0%	1,698	36.3%	43.9%	12	35.3%	41.2%	819	30.8%	32.8%	6	25.0%	34.0%	879	43.6%	46.9%
	Upper	40	69.0%	2,980	63.7%	56.1%	22	64.7%	58.8%	1,843	69.2%	67.2%	18	75.0%	66.0%	1,137	56.4%	53.1%
	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	58	100%	4,678	100%	100.0%	34	100%	100%	2,662	100%	100%	24	100%	100%	2,016	100%	100%

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

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

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	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%
	Middle	0	0.0%	0	0.0%	43.9%	0	0.0%	28.0%	0	0.0%	20.5%	0	0.0%	21.9%	0	0.0%	15.6%
	Upper	0	0.0%	0	0.0%	56.1%	0	0.0%	72.0%	0	0.0%	79.5%	0	0.0%	78.1%	0	0.0%	84.4%
	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%
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%	0.0%	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%	43.9%	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%	56.1%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%
	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	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	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%
	Middle	45	28.0%	4,852	27.6%	43.9%	31	31.3%	39.7%	3,456	28.8%	37.3%	14	22.6%	38.7%	1,396	25.1%	38.2%
	Upper	116	72.0%	12,717	72.4%	56.1%	68	68.7%	60.3%	8,550	71.2%	62.7%	48	77.4%	61.3%	4,167	74.9%	61.8%
	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	161	100%	17,569	100%	100.0%	99	100%	100%	12,006	100%	100%	62	100%	100%	5,563	100%	100%

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



## Small Business Lending Tables

Small Business & Small Farm Lending By Revenue & Loan Size  
Assessment Area: OH Akron MSA

PRODUCT TYPE			Bank Lending & Demographic Data					Bank & Aggregate Lending									
			2022, 2023					2022					2023				
			Bank				Total Businesses	Count			Dollar		Count		Dollar		
			Count		Dollar			Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg		
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	\$ 000s	\$ %			
SMALL BUSINESS	Revenue	\$1 Million or Less	25	96.2%	9,878	94.1%	90.3%	13	32.9%	49.5%	5,893	90.5%	30.6%	12	100.0%	3,985	100.0%
		Over \$1 Million	0	0.0%	0	0.0%	8.8%	0	0.0%		0	0.0%		0	0.0%	0	0.0%
		Total Rev. available	25	96.2%	9,878	94.1%	99.1%	13	32.9%		5,893	90.5%		12	100.0%	3,985	100.0%
		Rev. Not Known	1	3.8%	616	5.9%	0.9%	1	7.1%		616	9.5%		0	0.0%	0	0.0%
		Total	26	100%	10,494	100%	100%	14	100%	100%	6,509	100%	100%	12	100%	3,985	100%
	Loan Size	\$100,000 or Less	3	11.5%	171	1.6%		2	14.3%	92.6%	96	1.5%	34.5%	1	8.3%	75	1.9%
		\$100,001 - \$250,000	7	26.9%	1,117	10.6%		2	14.3%	3.7%	299	4.6%	16.5%	5	41.7%	818	20.5%
		\$250,001 - \$1 Million	16	61.5%	9,206	87.7%		10	71.4%	3.6%	6,114	93.9%	49.0%	6	50.0%	3,092	77.6%
		Total	26	100%	10,494	100%		14	100%	100%	6,509	100%	100%	12	100%	3,985	100%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	3	12.0%	171	1.7%		2	15.4%		96	1.6%		1	8.3%	75	1.9%
		\$100,001 - \$250,000	7	28.0%	1,117	11.3%		2	15.4%		299	5.1%		5	41.7%	818	20.5%
		\$250,001 - \$1 Million	15	60.0%	8,590	87.0%		9	69.2%		5,498	93.3%		6	50.0%	3,092	77.6%
		Total	25	100%	9,878	100%		13	100%		5,893	100%		12	100%	3,985	100%
SMALL FARM	Revenue	\$1 Million or Less	0	0.0%	0	0.0%	98.1%	0	0.0%	73.2%	0	0.0%	52.2%	0	0.0%	0	0.0%
		Over \$1 Million	0	0.0%	0	0.0%	1.9%	0	0.0%		0	0.0%		0	0.0%	0	0.0%
		Total Rev. available	0	0.0%	0	0.0%	100.0%	0	0.0%		0	0.0%		0	0.0%	0	0.0%
		Not Known	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	0.0%		0	0.0%	0	0.0%
	Loan Size	\$100,000 or Less	0	0.0%	0	0.0%		0	0.0%	95.1%	0	0.0%	70.2%	0	0.0%	0	0.0%
		\$100,001 - \$250,000	0	0.0%	0	0.0%		0	0.0%	4.9%	0	0.0%	29.8%	0	0.0%	0	0.0%
		\$250,001 - \$500,000	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%		0	0.0%	100%	0	0.0%	100%	0	0.0%	0	0.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	0	0.0%	0	0.0%		0	0.0%		0	0.0%		0	0.0%	0	0.0%
		\$100,001 - \$250,000	0	0.0%	0	0.0%		0	0.0%		0	0.0%		0	0.0%	0	0.0%
		\$250,001 - \$500,000	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%		0	0.0%		0	0.0%		0	0.0%	0	0.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue

Based on 2022 FFIEC Census Data; 2016-2020 ACS data; 2022 D&B information

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: OH Akron MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending									
		2022, 2023					2022						2023			
		Bank				Total Businesses	Count			Dollar			Count		Dollar	
		Count		Dollar			Bank	Agg	Bank	Agg	Bank	Bank	Dollar	Bank		
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	\$ 000s	\$ %		
SMALL BUSINESSES	Low	1	3.8%	504	4.8%	9.1%	1	7.1%	7.7%	504	7.7%	6.6%	0	0.0%	0	0.0%
	Moderate	4	15.4%	1,371	13.1%	14.6%	2	14.3%	14.3%	1,066	16.4%	13.5%	2	16.7%	305	7.7%
	Middle	2	7.7%	949	9.0%	32.4%	1	7.1%	31.3%	149	2.3%	29.5%	1	8.3%	800	20.1%
	Upper	17	65.4%	7,230	68.9%	40.8%	8	57.1%	44.5%	4,350	66.8%	47.4%	9	75.0%	2,880	72.3%
	Unknown	2	7.7%	440	4.2%	3.2%	2	14.3%	1.7%	440	6.8%	2.9%	0	0.0%	0	0.0%
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	0.5%	0	0.0%	0.1%	0	0.0%	0	0.0%
	Total	26	100%	10,494	100%	100.0%	14	100%	100%	6,509	100%	100%	12	100%	3,985	100%
SMALL FARM						Total Farms										
	Low	0	0.0%	0	0.0%	4.9%	0	0.0%	7.3%	0	0.0%	31.2%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	6.8%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	29.0%	0	0.0%	29.3%	0	0.0%	27.4%	0	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	59.3%	0	0.0%	63.4%	0	0.0%	41.4%	0	0.0%	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%
	Tr Unknown	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%	0	0.0%

Originations & Purchases

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

Small Business & Small Farm Lending By Revenue & Loan Size  
Assessment Area: OH Cleveland MSA

PRODUCT TYPE		Bank Lending & Demographic Data					Bank & Aggregate Lending										
		2022, 2023					2022					2023					
		Bank		Total		Businesses	Count		Dollar			Agg	Count		Dollar		
		Count	Dollar				Bank	Agg	Bank	Agg	Bank		Bank				
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	\$ 000s	\$ %			
SMALL BUSINESS	Revenue	\$1 Million or Less	64	86.5%	21,310	81.5%	90.7%	36	78.3%	50.3%	12,284	71.8%	30.1%	28	100.0%	9,026	100.0%
		Over \$1 Million	1	1.4%	500	1.9%	8.6%	1	2.2%		500	2.9%		0	0.0%	0	0.0%
		Total/Rev. available	65	87.8%	21,810	83.4%	99.2%	37	80.4%		12,784	74.7%		28	100.0%	9,026	100.0%
		Rev. Not Known	9	12.2%	4,336	16.6%	0.8%	9	19.6%		4,336	25.3%		0	0.0%	0	0.0%
		Total	74	100%	26,146	100%		46	100%		17,120	100%		28	100%	9,026	100%
	Loan Size	\$100,000 or Less	16	21.6%	926	3.5%		9	19.6%	93.1%	493	2.9%	33.9%	7	25.0%	433	4.8%
		\$100,001 - \$250,000	13	17.6%	2,016	7.7%		7	15.2%	3.5%	995	5.8%	15.5%	6	21.4%	1,021	11.3%
		\$250,001 - \$1 Million	45	60.8%	23,204	88.7%		30	65.2%	3.4%	15,632	91.3%	50.5%	15	53.6%	7,572	83.9%
		Total	74	100%	26,146	100%		46	100%	100%	17,120	100%	100%	28	100%	9,026	100%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	15	23.4%	894	4.2%		8	22.2%		461	3.8%		7	25.0%	433	4.8%
		\$100,001 - \$250,000	12	18.8%	1,895	8.3%		6	16.7%		874	7.1%		6	21.4%	1,021	11.3%
		\$250,001 - \$1 Million	37	57.8%	18,521	86.9%		22	61.1%		10,949	89.1%		15	53.6%	7,572	83.9%
		Total	64	100%	21,310	100%		36	100%		12,284	100%		28	100%	9,026	100%
SMALL FARM	Revenue	\$1 Million or Less	0	0.0%	0	0.0%	Total Farms	0	0.0%	85.2%	0	0.0%	89.9%	0	0.0%	0	0.0%
		Over \$1 Million	0	0.0%	0	0.0%		0	0.0%		0	0.0%		0	0.0%	0	0.0%
		Total/Rev. available	0	0.0%	0	0.0%		0	0.0%		0	0.0%		0	0.0%	0	0.0%
		Not Known	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	0.0%		0	0.0%	0	0.0%
	Loan Size	\$100,000 or Less	0	0.0%	0	0.0%		0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	0	0.0%
		\$100,001 - \$250,000	0	0.0%	0	0.0%		0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
		\$250,001 - \$500,000	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%		0	0.0%	100%	0	0.0%	100%	0	0.0%	0	0.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	0	0.0%	0	0.0%		0	0.0%		0	0.0%		0	0.0%	0	0.0%
		\$100,001 - \$250,000	0	0.0%	0	0.0%		0	0.0%		0	0.0%		0	0.0%	0	0.0%
		\$250,001 - \$500,000	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%		0	0.0%		0	0.0%		0	0.0%	0	0.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue

Based on 2022 FFIEC Census Data; 2016-2020 ACS data; 2022 D&B information



**Geographic Distribution of Small Business & Small Farm Loans**

Assessment Area: OH Cleveland MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending									
		2022, 2023					2022						2023			
		Count		Dollar		Total Businesses	Count		Dollar		Agg	\$ %	Count		Dollar	
		#	%	\$ (000s)	\$ %	%	#	%	\$ 000s	\$ %			#	%	\$ 000s	\$ %
SMALL BUSINESSES	Low	9	12.2%	4,934	18.9%	12.6%	7	15.2%	10.6%	3,221	18.8%	11.6%	2	7.1%	1,713	19.0%
	Moderate	6	8.1%	1,835	7.0%	19.2%	2	4.3%	17.7%	917	5.4%	17.2%	4	14.3%	918	10.2%
	Middle	17	23.0%	5,613	21.5%	25.4%	8	17.4%	26.1%	2,948	17.2%	22.2%	9	32.1%	2,665	29.5%
	Upper	42	56.8%	13,764	52.6%	40.4%	29	63.0%	43.4%	10,034	58.6%	46.7%	13	46.4%	3,730	41.3%
	Unknown	0	0.0%	0	0.0%	2.4%	0	0.0%	2.1%	0	0.0%	2.2%	0	0.0%	0	0.0%
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	0.2%	0	0.0%	0.1%	0	0.0%	0	0.0%
	Total	74	100%	26,146	100%	100.0%	46	100%	100%	17,120	100%	100%	28	100%	9,026	100%
SMALL FARM	Total Farms															
	Low	0	0.0%	0	0.0%	11.0%	0	0.0%	9.3%	0	0.0%	4.0%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	19.4%	0	0.0%	27.8%	0	0.0%	23.9%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	23.2%	0	0.0%	35.2%	0	0.0%	38.4%	0	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	46.0%	0	0.0%	22.2%	0	0.0%	29.7%	0	0.0%	0	0.0%
	Unknown	0	0.0%	0	0.0%	0.4%	0	0.0%	1.9%	0	0.0%	1.7%	0	0.0%	0	0.0%
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	3.7%	0	0.0%	2.3%	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%	0	0.0%

Originations & Purchases

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

Small Business & Small Farm Lending By Revenue & Loan Size  
Assessment Area: OH Columbus MSA

PRODUCT TYPE		Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022					2023						
		Bank				Total Businesses	Count			Dollar			Count			Dollar		
		Count		Dollar			Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	%	%	#	%	%	\$ 000s	%	%	#	%	\$ 000s	%				
SMALL BUSINESS	Revenue	\$1 Million or Less	24	100.0%	6,363	100.0%	91.6%	14	100.0%	51.5%	4,311	100.0%	33.0%	10	100.0%	2,052	100.0%	
		Over \$1 Million	0	0.0%	0	0.0%	7.3%	0	0.0%		0	0.0%		0	0.0%	0	0.0%	
		Total Rev. available	24	100.0%	6,363	100.0%	99.0%	14	100.0%		4,311	100.0%		10	100.0%	2,052	100.0%	
		Rev. Not Known	0	0.0%	0	0.0%	1.0%	0	0.0%		0	0.0%		0	0.0%	0	0.0%	
		Total	24	100%	6,363	100%	100%	14	100%		4,311	100%		10	100%	2,052	100%	
	Loan Size	\$100,000 or Less	9	37.5%	703	11.0%		4	28.6%	93.9%	325	7.5%	39.2%	5	50.0%	378	18.4%	
		\$100,001 - \$250,000	5	20.8%	956	15.0%		3	21.4%	3.1%	561	13.0%	15.1%	2	20.0%	395	19.2%	
		\$250,001 - \$1 Million	10	41.7%	4,704	73.9%		7	50.0%	3.0%	3,425	79.4%	45.7%	3	30.0%	1,279	62.3%	
		Total	24	100%	6,363	100%		14	100%	100%	4,311	100%	100%	10	100%	2,052	100%	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	9	37.5%	703	11.0%		4	28.6%		325	7.5%		5	50.0%	378	18.4%	
		\$100,001 - \$250,000	5	20.8%	956	15.0%		3	21.4%		561	13.0%		2	20.0%	395	19.2%	
		\$250,001 - \$1 Million	10	41.7%	4,704	73.9%		7	50.0%		3,425	79.4%		3	30.0%	1,279	62.3%	
		Total	24	100%	6,363	100%		14	100%		4,311	100%		10	100%	2,052	100%	
	SMALL FARM	Revenue	\$1 Million or Less	1	100.0%	55	100.0%	97.6%	0	0.0%	54.2%	0	0.0%	64.8%	1	100%	55	100%
			Over \$1 Million	0	0.0%	0	0.0%	2.4%	0	0.0%		0	0.0%		0	0.0%	0	0.0%
Total Rev. available			1	100.0%	55	100.0%	100.0%	0	0.0%		0	0.0%		1	100.0%	55	100.0%	
Not Known			0	0.0%	0	0.0%	0.0%	0	0.0%		0	0.0%		0	0.0%	0	0.0%	
Total			1	100%	55	100%	100%	0	0.0%		0	0.0%		1	100%	55	100%	
Loan Size		\$100,000 or Less	1	100.0%	55	100.0%		0	0.0%	90.3%	0	0.0%	38.3%	1	100.0%	55	100.0%	
		\$100,001 - \$250,000	0	0.0%	0	0.0%		0	0.0%	6.7%	0	0.0%	34.0%	0	0.0%	0	0.0%	
		\$250,001 - \$500,000	0	0.0%	0	0.0%		0	0.0%	2.9%	0	0.0%	27.7%	0	0.0%	0	0.0%	
		Total	1	100%	55	100%		0	0.0%	100%	0	0.0%	100%	1	100%	55	100%	
Loan Size & Rev \$1 Mill or Less		\$100,000 or Less	1	100.0%	55	100.0%		0	0.0%		0	0.0%		1	100.0%	55	100.0%	
		\$100,001 - \$250,000	0	0.0%	0	0.0%		0	0.0%		0	0.0%		0	0.0%	0	0.0%	
		\$250,001 - \$500,000	0	0.0%	0	0.0%		0	0.0%		0	0.0%		0	0.0%	0	0.0%	
		Total	1	100%	55	100%		0	0.0%		0	0.0%		1	100%	55	100%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue

Based on 2022 FFIEC Census Data; 2016-2020 ACS data; 2022 D&B information

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: OH Columbus MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending										
		2022, 2023					2022						2023				
		Bank				Total Businesses	Count			Dollar			Agg	Count		Dollar	
		Count		Dollar			Bank	Agg	Bank	Agg	Bank	Dollar					
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	\$ 000s	\$ %			
SMALL BUSINESSES	Low	1	4.2%	456	7.2%	8.9%	0	0.0%	7.9%	0	0.0%	8.8%	1	10.0%	456	22.2%	
	Moderate	0	0.0%	0	0.0%	15.8%	0	0.0%	13.8%	0	0.0%	11.4%	0	0.0%	0	0.0%	
	Middle	7	29.2%	2,214	34.8%	31.5%	4	28.6%	30.6%	1,623	37.6%	27.0%	3	30.0%	591	28.8%	
	Upper	16	66.7%	3,693	58.0%	42.3%	10	71.4%	46.5%	2,688	62.4%	51.3%	6	60.0%	1,005	49.0%	
	Unknown	0	0.0%	0	0.0%	1.4%	0	0.0%	0.9%	0	0.0%	1.3%	0	0.0%	0	0.0%	
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	0.3%	0	0.0%	0.1%	0	0.0%	0	0.0%	
	Total	24	100%	6,363	100%	100.0%	14	100%	100%	4,311	100%	100%	10	100%	2,052	100%	
SMALL FARM	Total Farms																
	Low	0	0.0%	0	0.0%	3.2%	0	0.0%	2.1%	0	0.0%	2.7%	0	0.0%	0	0.0%	
	Moderate	0	0.0%	0	0.0%	9.9%	0	0.0%	12.6%	0	0.0%	15.7%	0	0.0%	0	0.0%	
	Middle	0	0.0%	0	0.0%	39.4%	0	0.0%	38.2%	0	0.0%	43.2%	0	0.0%	0	0.0%	
	Upper	1	100.0%	55	100.0%	47.5%	0	0.0%	46.2%	0	0.0%	33.9%	1	100.0%	55	100.0%	
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.8%	0	0.0%	4.5%	0	0.0%	0	0.0%	
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%	
Total	1	100%	55	100%	100.0%	0	0.0%	100%	0	0.0%	100%	1	100%	55	100%		

Originations & Purchases

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

Small Business & Small Farm Lending By Revenue & Loan Size  
Assessment Area: OH Dayton MSA

PRODUCT TYPE			Bank Lending & Demographic Data						Bank & Aggregate Lending									
			2022, 2023						2022						2023			
			Bank				Total Businesses	Count			Dollar			Count		Dollar		
			Count		Dollar			Bank	Agg	Bank	Agg	Bank	Bank					
			#	%	\$ (000s)	\$ %								%	#	%	%	\$ 000s
SMALL BUSINESS	Revenue	\$1 Million or Less	17	94.4%	4,241	87.1%	90.9%	7	87.5%	52.1%	1,475	70.1%	27.0%	10	100.0%	2,766	100.0%	
		Over \$1 Million	0	0.0%	0	0.0%	8.5%	0	0.0%		0	0.0%		0	0.0%	0	0.0%	
		Total/Rev. available	17	94.4%	4,241	87.1%	99.4%	7	87.5%		1,475	70.1%		10	100.0%	2,766	100.0%	
		Rev. Not Known	1	5.6%	630	12.9%	0.6%	1	12.5%		630	29.9%		0	0.0%	0	0.0%	
		Total	18	100%	4,871	100%	100%	8	100%	100%	2,105	100%	100%	10	100%	2,766	100%	
	Loan Size	\$100,000 or Less	3	16.7%	195	4.0%		1	12.5%	92.5%	85	4.0%	31.5%	2	20.0%	110	4.0%	
		\$100,001 - \$250,000	10	55.6%	1,664	34.2%		4	50.0%	3.6%	555	26.4%	14.8%	6	60.0%	1,109	40.1%	
		\$250,001 - \$1 Million	5	27.8%	3,012	61.8%		3	37.5%	3.9%	1,465	69.6%	53.7%	2	20.0%	1,547	55.9%	
		Total	18	100%	4,871	100%		8	100%	100%	2,105	100%	100%	10	100%	2,766	100%	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	3	17.6%	195	4.6%		1	14.3%		85	5.8%		2	20.0%	110	4.0%	
		\$100,001 - \$250,000	10	58.8%	1,664	39.2%		4	57.1%		555	37.6%		6	60.0%	1,109	40.1%	
		\$250,001 - \$1 Million	4	23.5%	2,382	56.2%		2	28.6%		835	56.6%		2	20.0%	1,547	55.9%	
		Total	17	100%	4,241	100%		7	100%		1,475	100%		10	100%	2,766	100%	
SMALL FARM	Revenue	\$1 Million or Less	0	0.0%	0	0.0%	97.2%	0	0.0%	69.8%	0	0.0%	47.1%	0	0.0%	0	0.0%	
		Over \$1 Million	0	0.0%	0	0.0%	2.4%	0	0.0%		0	0.0%		0	0.0%	0	0.0%	
		Total/Rev. available	0	0.0%	0	0.0%	99.6%	0	0.0%		0	0.0%		0	0.0%	0	0.0%	
		Not Known	0	0.0%	0	0.0%	0.4%	0	0.0%		0	0.0%		0	0.0%	0	0.0%	
		Total	0	0.0%	0	0.0%	100%	0	0.0%		0	0.0%		0	0.0%	0	0.0%	
	Loan Size	\$100,000 or Less	0	0.0%	0	0.0%		0	0.0%	96.2%	0	0.0%	58.3%	0	0.0%	0	0.0%	
		\$100,001 - \$250,000	0	0.0%	0	0.0%		0	0.0%	1.9%	0	0.0%	11.4%	0	0.0%	0	0.0%	
		\$250,001 - \$500,000	0	0.0%	0	0.0%		0	0.0%	1.9%	0	0.0%	30.3%	0	0.0%	0	0.0%	
		Total	0	0.0%	0	0.0%		0	0.0%	100%	0	0.0%	100%	0	0.0%	0	0.0%	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	0	0.0%	0	0.0%		0	0.0%		0	0.0%		0	0.0%	0	0.0%	
		\$100,001 - \$250,000	0	0.0%	0	0.0%		0	0.0%		0	0.0%		0	0.0%	0	0.0%	
		\$250,001 - \$500,000	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%		0	0.0%		0	0.0%		0	0.0%	0	0.0%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue

Based on 2022 FFIEC Census Data; 2016-2020 ACS data; 2022 D&B information

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: OH Dayton MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending									
		2022, 2023					2022						2023			
		Count		Dollar		Total Businesses	Count		Dollar		Agg \$ %	Count Bank	Dollar		Agg \$ %	Count Bank
		#	%	\$ (000s)	\$ %	%	#	%	\$ 000s	\$ %		#	%	\$ 000s	\$ %	#
SMALL BUSINESSES	Low	1	5.6%	130	2.7%	10.3%	1	12.5%	9.6%	130	6.2%	10.9%	0	0.0%	0	0.0%
	Moderate	5	27.8%	1,707	35.0%	21.2%	1	12.5%	19.5%	340	16.2%	21.0%	4	40.0%	1,367	49.4%
	Middle	5	27.8%	1,048	21.5%	36.8%	3	37.5%	36.5%	735	34.9%	34.1%	2	20.0%	313	11.3%
	Upper	7	38.9%	1,986	40.8%	31.0%	3	37.5%	33.6%	900	42.8%	33.6%	4	40.0%	1,086	39.3%
	Unknown	0	0.0%	0	0.0%	0.7%	0	0.0%	0.5%	0	0.0%	0.3%	0	0.0%	0	0.0%
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	0.4%	0	0.0%	0.2%	0	0.0%	0	0.0%
	Total	18	100%	4,871	100%	100.0%	8	100%	100%	2,105	100%	100%	10	100%	2,766	100%
SMALL FARM	Total Farms															
	Low	0	0.0%	0	0.0%	2.4%	0	0.0%	3.8%	0	0.0%	1.4%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	12.1%	0	0.0%	9.4%	0	0.0%	10.9%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	58.3%	0	0.0%	66.0%	0	0.0%	81.7%	0	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	26.7%	0	0.0%	20.8%	0	0.0%	6.0%	0	0.0%	0	0.0%
	Unknown	0	0.0%	0	0.0%	0.4%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Tr Unknown	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%	0	0.0%

Originations & Purchases

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

Small Business & Small Farm Lending By Revenue & Loan Size  
Assessment Area: OH Mansfield MSA

PRODUCT TYPE		Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022					2023						
		Bank			Total Business as %	Count		Dollar			Count		Dollar					
		Count	Dollar			Bank	Agg	Bank	Agg	Bank	Dollar							
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	\$ 000s	\$ %				
SMALL BUSINESS	Revenue	\$1 Million or Less	6	100.0%	1,107	100.0%	90.7%	3	100.0%	55.2%	450	100.0%	33.3%	3	100.0%	657	100.0%	
		Over \$1 Million	0	0.0%	0	0.0%	8.2%	0	0.0%		0	0.0%		0	0.0%	0	0.0%	
		Total Rev. available	6	100.0%	1,107	100.0%	98.9%	3	100.0%		450	100.0%		3	100.0%	657	100.0%	
		Rev. Not Known	0	0.0%	0	0.0%	1.1%	0	0.0%		0	0.0%		0	0.0%	0	0.0%	
		Total	6	100%	1,107	100%	100%	3	100%		450	100%	100%	3	100%	657	100%	
	Loan Size	\$100,000 or Less	2	33.3%	120	10.8%		1	33.3%	94.2%	100	22.2%	45.1%	1	33.3%	20	3.0%	
		\$100,001 - \$250,000	2	33.3%	350	31.6%		2	66.7%	3.6%	350	77.8%	19.4%	0	0.0%	0	0.0%	
		\$250,001 - \$1 Million	2	33.3%	637	57.5%		0	0.0%	2.2%	0	0.0%	35.5%	2	66.7%	637	97.0%	
		Total	6	100%	1,107	100%		3	100%	100%	450	100%	100%	3	100%	657	100%	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	2	33.3%	120	10.8%		1	33.3%		100	22.2%		1	33.3%	20	3.0%	
		\$100,001 - \$250,000	2	33.3%	350	31.6%		2	66.7%		350	77.8%		0	0.0%	0	0.0%	
		\$250,001 - \$1 Million	2	33.3%	637	57.5%		0	0.0%		0	0.0%		2	66.7%	637	97.0%	
		Total	6	100%	1,107	100%		3	100%		450	100%		3	100%	657	100%	
	SMALL FARM	Revenue	\$1 Million or Less	8	100.0%	611	100.0%	98.3%	0	0.0%	62.8%	0	0.0%	70.3%	8	100%	611	100%
			Over \$1 Million	0	0.0%	0	0.0%	1.7%	0	0.0%		0	0.0%		0	0.0%	0	0.0%
			Total Rev. available	8	100.0%	611	100.0%	100.0%	0	0.0%		0	0.0%		8	100.0%	611	100.0%
Not Known			0	0.0%	0	0.0%	0.0%	0	0.0%		0	0.0%		0	0.0%	0	0.0%	
Total			8	100%	611	100%	100%	0	0.0%		0	0.0%	100%	8	100%	611	100%	
Loan Size		\$100,000 or Less	5	62.5%	135	22.1%		0	0.0%	96.2%	0	0.0%	75.4%	5	62.5%	135	22.1%	
		\$100,001 - \$250,000	3	37.5%	476	77.9%		0	0.0%	3.8%	0	0.0%	24.6%	3	37.5%	476	77.9%	
		\$250,001 - \$500,000	0	0.0%	0	0.0%		0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%	
		Total	8	100%	611	100%		0	0.0%	100%	0	0.0%	100%	8	100%	611	100%	
Loan Size & Rev \$1 Mill or Less		\$100,000 or Less	5	62.5%	135	22.1%		0	0.0%		0	0.0%		5	62.5%	135	22.1%	
		\$100,001 - \$250,000	3	37.5%	476	77.9%		0	0.0%		0	0.0%		3	37.5%	476	77.9%	
		\$250,001 - \$500,000	0	0.0%	0	0.0%		0	0.0%		0	0.0%		0	0.0%	0	0.0%	
		Total	8	100%	611	100%		0	0.0%		0	0.0%		8	100%	611	100%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue

Based on 2022 FFIEC Census Data; 2016-2020 ACS data; 2022 D&B information

**Geographic Distribution of Small Business & Small Farm Loans**

Assessment Area: OH Mansfield MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending									
		2022, 2023					2022					2023				
		Count		Dollar		Total Businesses	Count		Dollar		Agg	Count		Dollar		Agg
		#	%	\$ (000s)	\$ %	%	#	%	\$ (000s)	\$ %		#	%	\$ (000s)	\$ %	
SMALL BUSINESSES	Low	1	16.7%	200	18.1%	5.4%	1	33.3%	4.2%	200	44.4%	5.3%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	20.8%	0	0.0%	18.7%	0	0.0%	24.9%	0	0.0%	0	0.0%
	Middle	4	66.7%	807	72.9%	43.7%	1	33.3%	45.5%	150	33.3%	44.3%	3	100.0%	657	100.0%
	Upper	1	16.7%	100	9.0%	28.8%	1	33.3%	28.3%	100	22.2%	23.6%	0	0.0%	0	0.0%
	Unknown	0	0.0%	0	0.0%	1.3%	0	0.0%	1.6%	0	0.0%	1.6%	0	0.0%	0	0.0%
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	1.7%	0	0.0%	0.4%	0	0.0%	0	0.0%
	Total	6	100%	1,107	100%	100.0%	3	100%	100%	450	100%	100%	3	100%	657	100%
SMALL FARM					Total Farms											
	Low	0	0.0%	0	0.0%	1.2%	0	0.0%	1.3%	0	0.0%	1.9%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	0.6%	0	0.0%	1.3%	0	0.0%	0.5%	0	0.0%	0	0.0%
	Middle	2	25.0%	40	6.5%	68.2%	0	0.0%	60.3%	0	0.0%	48.4%	2	25.0%	40	6.5%
	Upper	6	75.0%	571	93.5%	30.1%	0	0.0%	37.2%	0	0.0%	49.3%	6	75.0%	571	93.5%
	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%
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Total	8	100%	611	100%	100.0%	0	0.0%	100%	0	0.0%	100%	8	100%	611	100%

Originations & Purchases

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

Small Business & Small Farm Lending By Revenue & Loan Size  
Assessment Area: Nonmetropolitan Indiana

PRODUCT TYPE		Bank Lending & Demographic Data					Bank & Aggregate Lending										
		2022, 2023					2022					2023					
		Bank				Total Business es	Count			Dollar		Agg	Count			Dollar	
		Count	Dollar				Bank	Agg	Bank	Agg	Count		Dollar				
#	%	\$ (000s)	\$	%	%	#	%	%	\$ 000s	\$	%	#	%	\$ 000s	\$	%	
SMALL BUSINESS	Revenue	\$1Million or Less	8	100.0%	1,375	100.0%	89.2%	6	100.0%	55.9%	1,310	100.0%	34.7%	2	100.0%	65	100.0%
		Over \$1Million	0	0.0%	0	0.0%	8.4%	0	0.0%		0	0.0%		0	0.0%	0	0.0%
		Total/Rev. available	8	100.0%	1,375	100.0%	97.6%	6	100.0%		1,310	100.0%		2	100.0%	65	100.0%
		Rev. Not Known	0	0.0%	0	0.0%	2.4%	0	0.0%		0	0.0%		0	0.0%	0	0.0%
		Total	8	100%	1,375	100%	100%	6	100%		1,310	100%		2	100%	65	100%
	Loan Size	\$100,000 or Less	4	50.0%	190	13.8%		2	33.3%	92.3%	125	9.5%	32.7%	2	100.0%	65	100.0%
		\$100,001 - \$250,000	2	25.0%	303	22.0%		2	33.3%	4.0%	303	23.1%	15.9%	0	0.0%	0	0.0%
		\$250,001 - \$1Million	2	25.0%	882	64.1%		2	33.3%	3.7%	882	67.3%	51.4%	0	0.0%	0	0.0%
		Total	8	100%	1,375	100%		6	100%	100%	1,310	100%	100%	2	100%	65	100%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	4	50.0%	190	13.8%		2	33.3%		125	9.5%		2	100.0%	65	100.0%
		\$100,001 - \$250,000	2	25.0%	303	22.0%		2	33.3%		303	23.1%		0	0.0%	0	0.0%
		\$250,001 - \$1Million	2	25.0%	882	64.1%		2	33.3%		882	67.3%		0	0.0%	0	0.0%
		Total	8	100%	1,375	100%		6	100%		1,310	100%		2	100%	65	100%
SMALL FARM	Revenue	\$1Million or Less	2	100.0%	400	100.0%	99.3%	0	0.0%	52.7%	0	0.0%	38.3%	2	100%	400	100%
		Over \$1Million	0	0.0%	0	0.0%	0.7%	0	0.0%		0	0.0%		0	0.0%	0	0.0%
		Total/Rev. available	2	100.0%	400	100.0%	100.0%	0	0.0%		0	0.0%		2	100.0%	400	100.0%
		Not Known	0	0.0%	0	0.0%	0.0%	0	0.0%		0	0.0%		0	0.0%	0	0.0%
		Total	2	100%	400	100%	100%	0	0.0%		0	0.0%		2	100%	400	100%
	Loan Size	\$100,000 or Less	0	0.0%	0	0.0%		0	0.0%	83.6%	0	0.0%	22.9%	0	0.0%	0	0.0%
		\$100,001 - \$250,000	2	100.0%	400	100.0%		0	0.0%	7.3%	0	0.0%	26.1%	2	100.0%	400	100.0%
		\$250,001 - \$500,000	0	0.0%	0	0.0%		0	0.0%	9.1%	0	0.0%	51.0%	0	0.0%	0	0.0%
		Total	2	100%	400	100%		0	0.0%	100%	0	0.0%	100%	2	100%	400	100%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	0	0.0%	0	0.0%		0	0.0%		0	0.0%		0	0.0%	0	0.0%
		\$100,001 - \$250,000	2	100.0%	400	100.0%		0	0.0%		0	0.0%		2	100.0%	400	100.0%
		\$250,001 - \$500,000	0	0.0%	0	0.0%		0	0.0%		0	0.0%		0	0.0%	0	0.0%
		Total	2	100%	400	100%		0	0.0%		0	0.0%		2	100%	400	100%

Originations & Purchases

Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue

Based on 2022 FFIEC Census Data; 2016-2020 ACS data; 2022 D&B information



**Geographic Distribution of Small Business & Small Farm Loans**  
Assessment Area: Nonmetropolitan Indiana

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending									
		2022, 2023					2022					2023				
		Count		Bank Dollar		Total Businesses	Count		Dollar			Count		Dollar Bank		
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	\$ 000s	\$ %
SMALL BUSINESSES	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%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Middle	5	62.5%	855	62.2%	46.5%	4	66.7%	46.1%	825	63.0%	43.3%	1	50.0%	30	46.2%
	Upper	3	37.5%	520	37.8%	53.5%	2	33.3%	52.4%	485	37.0%	56.4%	1	50.0%	35	53.8%
	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%
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	1.5%	0	0.0%	0.3%	0	0.0%	0	0.0%
	Total	8	100%	1,375	100%	100.0%	6	100%	100%	1,310	100%	100%	2	100%	65	100%
SMALL FARM	Total Farms															
	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%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Middle	2	100.0%	400	100.0%	54.9%	0	0.0%	60.0%	0	0.0%	53.6%	2	100.0%	400	100.0%
	Upper	0	0.0%	0	0.0%	45.1%	0	0.0%	40.0%	0	0.0%	46.4%	0	0.0%	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%
	Tr Unknown	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%	400	100%	100.0%	0	0.0%	100%	0	0.0%	100%	2	100%	400	100%

Originations & Purchases

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

## APPENDIX H

### 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:** All Agencies have adopted the following language. Affordable housing (including multifamily rental housing) for LMI individuals; community services targeted to LMI 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 revenue of \$1.0 million or less; or, activities that revitalize or stabilize LMI geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize:

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or,
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on:
  - a. Rates of poverty, unemployment, and population loss; or
  - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of LMI individuals.

**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 loans, other secured consumer loans, and other unsecured consumer loans.

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

**Full-scope review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (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 refinancing 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 under the Lending, Investment, and Service Tests 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.

**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) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1.0 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 Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

**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.