

# **PUBLIC DISCLOSURE**

October 14, 2025

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Minster Bank  
RSSD #604024

95 W. 4<sup>th</sup> Street  
Minster, OH 45865

Federal Reserve Bank of Cleveland

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

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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## INSTITUTION'S COMMUNITY REINVESTMENT ACT (CRA) RATING

**Minster Bank (Minster) is rated: Outstanding**

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Outstanding

The major factors and criteria contributing to this rating include:

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

## SCOPE OF EXAMINATION

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

- Minster's 13-quarter average NLTD ratio.
- Home Mortgage Disclosure Act (HMDA)-reportable (home purchase, refinance, home improvement, multi-family, and other purpose closed end) loans were analyzed from January 1, 2023, through December 31, 2024. Small business, consumer (motor vehicle, secured, and unsecured) were analyzed from January 1, 2024, through December 31, 2024.
- Based on the total loan volume by number and dollar amount, HMDA-reportable lending received the most weight, followed by small business and consumer lending, respectively. In accordance with CRA examination procedures, the HMDA universe in 2023 and 2024

was reviewed,<sup>1</sup> and conclusions were reached in the aggregate. A sample of small business and consumer loans in 2024 was chosen due to significant volume, and as such, an accurate conclusion concerning the bank's lending record could not be reached without their inclusion. Conclusions were reached in the aggregate for consumer loans. Demographic data (proxy) was used as a comparison in evaluating the bank's lending performance.

- Aggregated (peer) lending data, which is comprised of lending activity for all other lenders reporting home mortgage loans under HMDA in the respective AA, was used as a comparison in evaluating Minster's lending performance in 2023 and 2024.
- Borrower distribution received more weight than geographic distribution based on the overall percentage of low- and moderate-income (LMI) families (38.1%) compared to LMI geographies (31.6%). There are no LMI tracts in Nonmetropolitan Ohio.
- 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 the outcome impacted the analyses.
- The evaluation period for community development activities was October 5, 2021, through October 14, 2025. Community development activities are comprised of community development loans, qualified investments, and services.

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

For this evaluation, Minster has the following two CRA delineated AAs:

- Nonmetropolitan Ohio – Full-scope evaluation
  - Consists of the entireties of Auglaize, Mercer, and Shelby counties.
- Dayton-Kettering-Beavercreek, OH MSA #19430 – (Dayton) – Limited-scope evaluation
  - Consists of entireties of Miami and Montgomery counties (excluding Greene County).

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<sup>1</sup>HMDA data was reviewed since the bank's previous evaluation; however, only data for 2023 and 2024 is presented in this evaluation.

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

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

## DESCRIPTION OF INSTITUTION

Minster is an intrastate community bank and the sole subsidiary of Minster Financial Corporation; both entities are headquartered in Minster, Ohio. The bank's characteristics include:

- Minster has total assets of \$757.7 million and total deposits of \$ 678.7 million as of December 31, 2024. Total assets increased by 12.4%,and total deposits increased by 13.6% since the previous evaluation.<sup>2</sup>
- All of Minster's Automated Teller Machines (ATMs) are full-service and will be referred to as ATMs throughout this evaluation. In addition to the main office with an ATM, Minster maintains six branches with ATMs. Minster maintains its main office and five branches in Nonmetropolitan Ohio. Minster maintains two branches in the Dayton AA in Vandalia (Montgomery County) in a middle-income tract and Troy (Miami County) in an upper-income tract.
- The main office and six branches offer drive-thru services and extended and weekend hours of service.
- No branches opened or closed since the previous evaluation; however, Minster consolidated its branch in the Wagner's IGA grocery store (August 4, 2023) into its main office. The stand-alone ATM remains in the grocery store.

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<sup>2</sup>Financial As of Date: June 30, 2021

- Minster is a full-service retail bank that offers traditional products, including consumer and business checking and savings accounts, home equity loans, motor vehicle loans, credit cards, and commercial and agriculture loans. Minster is primarily a commercial lender.
- Minster’s website ([minsterbank.com](http://minsterbank.com)), Customer Contact Center, and online and mobile banking supplements its branch and ATM networks. Customers can confirm balances, what transactions have posted, pay bills, transfer funds between accounts, and make deposits.

The loan portfolio composition as of December 31, 2024, is shown in the table below. Minster’s primary business focus is non-farm non-residential real estate loans followed by residential real estate.

COMPOSITION OF LOAN PORTFOLIO					
Loan Type	12/31/2024		12/31/2023		% Change
	\$ (000s)	Percent	\$ (000s)	Percent	
Construction and Development	15,570	4.2%	7,947	2.4%	95.9%
Secured by One- to Four- Family Dwelling	96,457	26.3%	81,494	24.3%	18.4%
Other Real Estate: Farmland	28,818	7.9%	30,887	9.2%	-6.7%
Multifamily	26,184	7.1%	22,243	6.6%	17.7%
Nonfarm nonresiden	132,730	36.2%	128,990	38.4%	2.9%
Commercial and Industrial	53,363	14.6%	51,312	15.3%	4.0%
Loans to Individuals	5,769	1.6%	5,648	1.7%	2.1%
Agricultural Loans	7,749	2.1%	7,026	2.1%	10.3%
<i>Total</i>	<i>\$366,640</i>	<i>100.00%</i>	<i>\$335,547</i>	<i>100.00%</i>	<i>9.3%</i>

\*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.

Minster’s investment portfolio as of December 31, 2024, was \$335.6 million, which represented 43.4% of total assets. U.S. Treasury and Agency securities, interest-bearing bank balances, and municipal bonds accounted for 34.4%, 26.6%, 23.1% of total investments, respectively. The remaining 15.9% comprised of all other securities and fed funds sold.

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

Minster was rated Satisfactory under the CRA at its previous evaluation conducted October 4, 2021. The lending test was rated Satisfactory, and the community development test was rated Outstanding.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

### LENDING TEST

Minster’s performance relative to the lending test is rated Satisfactory based on Minster’s loan-to-deposit ratio, AA concentration, and borrower distribution.

Minster’s performance relative to the lending test is reasonable in Nonmetropolitan Ohio and the Dayton AA.

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

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

Comparative Loan-to-Deposit (LTD) Ratio		
Institution	Total Assets as of 12/31/2024 \$(000)	NLTD Ratio (%)
		13 – Quarter Average*
Minster Bank	\$757,667	47.9
<b>Similarly Situated Institutions</b>	<b>\$(000)</b>	<b>Custom Peer Ratio</b>
The Greenville National Bank	\$606,485	69.4
Osgood State Bank	\$491,603	78.0
The Peoples Bank Company	\$806,331	51.4
St. Henry Bank	\$474,296	59.3
<b>Quarterly LTD Ratio Average Since the Previous Evaluation</b>		<b>64.5</b>
* December 31, 2021 - December 31, 2024		

During this period, Minster’s NLTD ratio average 47.9%, compared to peer ratio at 64.5%. In discussions with bank management, they indicated its lower LTD ratio compared to peer can be attributed to Minster selling eligible consumer mortgage loans on the secondary market shortly after origination; the loans are booked as bank assets only for a short period of time. Based on these factors, Minster’s NLTD ratio is considered reasonable given the bank’s size, financial condition, and AA credit needs.

### Assessment Area Concentration

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

#### Lending Inside and Outside the Assessment Area

Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Consumer	72	93.5	\$1,370	83.9	5	6.5	\$262	16.1
<b>Total Consumer related</b>	<b>72</b>	<b>93.5</b>	<b>\$1,370</b>	<b>83.9</b>	<b>5</b>	<b>6.5</b>	<b>\$262</b>	<b>16.1</b>
Home Purchase - Conventional	254	82.2	\$55,292	83	55	17.8	\$11,365	17
Refinancing	49	84.5	\$8,375	81.5	9	15.5	\$1,906	18.5
Home Improvement	8	100	\$1,329	100	0	0	\$0	0
Multi-Family Housing	6	50	\$2,770	25.3	6	50	\$8,200	74.7
Other Purpose Closed-End	11	100	\$1,268	100	0	0	\$0	0
<b>Total HMDA related</b>	<b>328</b>	<b>82.4</b>	<b>\$69,034</b>	<b>76.3</b>	<b>70</b>	<b>17.6</b>	<b>\$21,471</b>	<b>23.7</b>
Small Business	85	90.4	\$15,982	90.6	9	9.6	\$1,661	9.4
<b>Total Small Bus. related</b>	<b>85</b>	<b>90.4</b>	<b>\$15,982</b>	<b>90.6</b>	<b>9</b>	<b>9.6</b>	<b>\$1,661</b>	<b>9.4</b>
<b>TOTAL LOANS</b>	<b>485</b>	<b>85.2</b>	<b>\$86,385</b>	<b>78.7</b>	<b>84</b>	<b>14.8</b>	<b>\$23,394</b>	<b>21.3</b>

Note: Affiliate loans not included

Of the bank’s total lending from January 1, 2023, to December 31, 2024, 85.2% by volume and 78.7% by dollar amount were made inside the AA.

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

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

Minster has a reasonable penetration among individuals of different income levels. Borrower distribution is reasonable in the Nonmetropolitan Ohio and the Dayton AA. The penetration among businesses of different sizes is reasonable in Nonmetropolitan Ohio and the Dayton AA.

### **Geographic Distribution of Loans**

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

Geographic distribution did not receive much consideration, since Nonmetropolitan Ohio does not have LMI tracts; however, the geographic distribution in middle- and upper-income tracts was analyzed and is considered reasonable.

### **Response to Complaints**

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

### **COMMUNITY DEVELOPMENT TEST**

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

Minster's community development is excellent in Nonmetropolitan Ohio and the Dayton AA.

Minster's community development performance demonstrates excellent responsiveness to community development needs in its AAs. Minster's community development activities primarily supported affordable housing initiatives, services targeted to LMI individuals and families, and economic development initiatives. Since the previous evaluation, Minster significantly increased its levels of community development activities, particularly in the Dayton AA which is a competitive market. The community contact emphasized the growing need for affordable housing. During the evaluation period, Minster was able to acquire a new Low Income Housing Tax Credit (LIHTC), which is a complex investment and a mortgage-backed security to support community development initiatives. These investments help address this expressed need.

### *Community Development Loans*

Minster originated six community development loans totaling \$6.0 million. The following table reflects the total number of community development loans by purpose, number, and dollar amount.

<b>Purpose of CD Loans</b>	<b>#</b>	<b>\$</b>
Services to LMI	4	\$4,450,000
Economic Development	2	\$1,532,000
<b>Total</b>	<b>6</b>	<b>\$5,982,000</b>

The largest concentration of community development loans by dollar amount benefited the Dayton AA, accounting for 74.4% of total loans. The remaining 25.6% benefited Nonmetropolitan Ohio.

The four loans supporting community services targeted to LMI individuals and families (\$4.5 million) were originated in the Dayton AA. These loans provided capital to four nonprofits allowing them to continue providing essential services to LMI individuals, families, and children. This funding helped cover operating costs, expansion, and bridge financing while awaiting disbursement of federal funds.

Refer to the full-scope AA for details regarding the two remaining community development loans.

### *Community Development Investments*

Minster had \$2.8 million in total qualified investments, grants, and small dollar contributions during the evaluation period.

Minster obtained two new investments worth \$2.0 million, representing 76.0% of total qualified investments. The first investment worth \$1.0 million is an Ohio equity fund that provides capital for LIHTC projects across the broader statewide area, including the bank's AAs. The second investment is a mortgage-backed security worth \$1.0 million that supports affordable housing initiatives across the Dayton MSA. The community contact indicated affordable housing is a significant need. These investments help address this expressed need. Also, LIHTC investments are considered complex and require specialized expertise to manage.

Minster holds two prior period investments with a book value of \$633,210, representing 24.0% of total qualified investments. These prior period investments include a LIHTC with a book value of \$118,357 that supports affordable housing initiatives across the broader statewide area, including the bank’s AAs and a municipal bond with a book value of \$514,853 that supports an LMI school district with a majority of students eligible for Ohio’s free and reduced lunch program in the Dayton AA.

Because Minster has been responsive to community development needs and opportunities across its AAs, consideration was given to five new municipal school bonds worth \$1.6 million and 13 prior period municipal school bonds with a book value of approximately \$4.2 million that support LMI school districts in the broader regional area.

Qualified investments also took the form of small dollar donations. The following table shows the total number of qualified donations by purpose, number, and dollar amount.

<b>Purpose of Donation</b>	<b>#</b>	<b>\$</b>
Services to LMI	44	\$70,961
Economic Development	12	\$26,100
Revitalization/Stabilization	1	\$7,500
Affordable Housing	3	\$5,156
<b>Total</b>	<b>60</b>	<b>\$109,717</b>

Minster made 60 donations totaling \$109,717 to 33 organizations. The majority of contributions supported organizations that provide wraparound services to LMI individuals and families, followed by organizations that support economic development, revitalization/stabilization, and affordable housing.

Minster is an Ohio Interest on Lawyers’ Trust Accounts (IOLTA) gold prime partner financial institution. The interest generated by paying premium interest rates supports critical legal services and improves access for LMI individuals in Ohio. As a gold prime partner, Minster pays a net yield of at least .65% bps or 65% federal funds target rate, whichever is higher. During the evaluation period, Minster’s paid \$70,378 above the market interest rate within its AAs.

Because Minster has been responsive to community development needs across its AAs, consideration was given to a \$500 donation emergency shelter to LMI individuals in the broader regional area.

Approximately 55.3% of Minster’s total qualified investments, donations, and grants by dollar amount benefited the Dayton AA, followed by 41.2% that benefited the broader statewide area that includes the bank’s AAs, and 1.1% that benefited Nonmetropolitan Ohio. The remaining 2.4% represents the IOLTA grants within the bank’s AAs.

**Community Development Services**

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

Purpose of CD Service	# Services	# Organizations	# Employees*	# Hours
Services to LMI	23	14	12	925
Economic Development	3	3	3	876
Affordable Housing	3	2	2	132
<b>Total</b>	<b>29</b>	<b>19</b>	<b>17</b>	<b>1,933</b>

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

Minster’s employees provided 1,933 hours of community development services supporting various service activities during the evaluation period. Total community development service hours equate to 1.0 annualized persons (ANP).<sup>3</sup>

Community development services include 1,894 hours (98.0%) serving on boards/committees and 39 hours (0.2%) providing financial literacy training through leadership and engaging in activities promoting or facilitating services for LMI individuals, affordable housing, and economic development.

Approximately 76.3% of Minster’s community development services benefited the Dayton AA. The remaining 23.7% of community development services benefited Nonmetropolitan Ohio.

Community development services included the following:

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

<sup>3</sup> Annualized Persons (ANP): Number CD qualified service hours divided by 2,000 work hours in a year

Financial Education – Minster continues to use American Bankers Association course content for in-person programs and Banzai® online courses for financial literacy training. Since the previous evaluation, Minster has partnered with Zogo® a financial literacy application designed to help young adults better understand personal finance. Minster utilizes these resources for teaching financial literacy and provides all associated classroom materials and in-person instruction. Financial literacy topics include but are not limited to financial responsibility and decision making, planning and money management, informed consumer decision making, and credit and debt management tools.

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

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

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

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN NONMETROPOLITAN OHIO**

Minster’s delineated AA consists of the entireties of Auglaize, Mercer, and Shelby counties. The Census Bureau released new size and population data from the 2020 Census on August 12, 2021, which impacted the composition of tracts. As a result of these changes, the AA was comprised of the following tracts:

<b>Income Tract Designations</b>	
<b>Assessment Area: Nonmetropolitan Ohio</b>	
<b>Income Tract Level</b>	<b>Number of Tracts</b>
	<b>2023-2024</b>
Low	0
Moderate	0
Middle	16
Upper	14
Unknown	0
<b>Total</b>	<b>30</b>

- Since the previous evaluation, the AA lost two moderate- and two upper-income tracts and gained four middle-income tracts. There were no changes to low- middle-, or unknown- income tracts.
- No middle-income census tracts in this AA were designated as distressed or underserved as defined by the Federal Financial Institution’s Examination Council (FFIEC).<sup>4</sup>
- As of June 30, 2024, the FDIC Deposit Market Share report, ranks Minster second among 18 institutions operating in the AA with 13.0% of the deposit market share, compared to the largest market holder, Peoples Bank Company, with 16.4% and the third largest market holder, U.S. Bank National Association at 11.0%. The top three financial institutions operate 18 branches, of which Minster operates five (27.7%). Minster has a significant presence in this market.
- The 2024 HMDA Peer Market data indicate Minster ranked fourth out of 179 HMDA reports in the AA and originated 156 loans. By comparison, first ranked Superior Credit Union Inc., second ranked Rocket Mortgage LLC, and third ranked U.S. Bank National Association originated 379, 156, and 137 loans, respectively.

<sup>4</sup> [FFIEC Distressed and Underserved Tracts](#)

- The 2023 HMDA Peer Market data indicate Minster ranked second out of 173 HMDA reporters in the AA and originated 120 loans. By comparison, first ranked Superior Credit Union Inc. and third ranked Western Ohio Mortgage Corporation originated 375 and 119 loans, respectively.
- Between 2023 and 2024, the total number of HMDA reporters in the AA increased by 3.5% and originated mortgage loans increased by 6.9% among these same HMDA reporters. Specifically, Minster’s originated mortgage loans increased by 30.0%.

**Community Contact**

A community contact interview was conducted as part of this evaluation to provide supplemental information regarding the area’s credit needs and context to demographic and economic conditions in the local community. The contact was with a local community development organization. The contact stated the most urgent need in the community is affordable housing. Rental units are in short supply. Available units are typically priced at or above the current market rate, while affordable rental units are often in disrepair. The contact stated there are manufacturing jobs in the community, but it is a challenge to hire qualified workers due to lack of available housing and long commutes. The contact indicated there are opportunities for banks to help address the lack of housing and create more homeownership opportunities for LMI individuals through a mix of flexible financial lending products and financial education. According to the contact, local banks are more engaged in the community and a reliable source of funding, compared to large financial institutions.

**Population Characteristics**

<b>Population Change</b>			
<b>Assessment Area: Nonmetropolitan Ohio</b>			
<b>Area</b>	<b>2020 Population</b>	<b>2024 Population</b>	<b>Percent Change</b>
Auglaize County	46,422	45,922	-1.1%
Mercer County	42,528	42,648	0.3%
Shelby County	48,230	47,952	-0.6%
<b>Assessment Area</b>	<b>137,180</b>	<b>136,522</b>	<b>-0.5%</b>
<b>Ohio</b>	<b>11,799,448</b>	<b>11,883,304</b>	<b>0.7%</b>

*Source: 2020-2024 U.S. Census Bureau and 2020 U.S. Census Bureau Decennial Census*

- From 2020 through 2024 the AA experienced a 0.5% decrease in population, compared to Ohio, which experienced an increase of 0.7%. Mercer County was the only county in the

AA that experienced a slight increase in population at 0.3%. Auglaize and Shelby counties are projected to lose population by 2030, while Mercer County is projected to experience slight population growth.<sup>5</sup>

- The most populous cities<sup>6</sup> in the AA reflect the same population trends:
  - Wapakoneta (Auglaize County) with 9,817 residents, population has declined by 1.4% since 2020.
  - Celina (Mercer County) with 10,945 residents, population has increased by 0.2% since 2020
  - Sidney (Shelby County) with 20,392 residents, population has declined by 0.8% since 2020.
- 75.4% of the AA population was 18 years of age or older, the legal age to enter a contract.
- The majority of the AA population (48.9%) was between the ages of 25 and 64, which is the prime-working age.
- 17.3% of the population in AA was 65 or older, compared to 16.9% in Ohio. The overall trend in population decline and higher percentage of elderly population indicates the area may have a decreased labor pool and potential for slower economic growth.

**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	
2023	\$79,500	0	- \$39,749	\$39,750	- \$63,599	\$63,600	- \$95,399	\$95,400	- & above	
2024	\$81,600	2.6%	0	- \$40,799	\$40,800	- \$65,279	\$65,280	- \$97,919	\$97,920	- & above

- During the evaluation period, median family income (MFI) in Nonmetropolitan Ohio increased by 2.6%.
- 2020 MFI in Nonmetropolitan Ohio was \$78,633, which represents a 1.1% increase from 2020 to 2023 and a 3.8% increase from 2020 to 2024.
- By comparison, in 2020 the AA MFI of \$78,633, which was 5.7% higher than the 2020 MFI in Ohio of \$74,391.
- Ohio’s minimum wage increased on January 1, 2024, to \$10.45<sup>7</sup> per hour or \$21,736 annually, from \$10.10 per hour or \$21,008 annually, which is a 3.5% increase since 2023.

<sup>5</sup> [Ohio County Profiles](#)

<sup>6</sup> [ibid](#)

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

- The Federal minimum is \$7.25<sup>8</sup> per hour or \$15,080 annually and has not increased since 2009.

<b>Poverty Rates</b>			
<b>Assesment Area: Nonmetropolitan Ohio</b>			
<b>Area</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>
Auglaize County	7.9%	8.4%	8.5%
Mercer County	7.3%	8.3%	7.6%
Shelby County	10.7%	9.3%	10.4%
<b>Ohio</b>	<b>13.3%</b>	<b>13.4%</b>	<b>13.2%</b>
<b>United States</b>	<b>12.8%</b>	<b>12.6%</b>	<b>12.5%</b>

*Source: Federal Reserve Economic Data | FRED | St. Louis Fed*

- Poverty rates in the AA were consistently lower than rates in Ohio and the nation.
- Between 2021 and 2023 poverty rates generally increased, except in Mercer County.
- Shelby County had the highest poverty rates and Mercer County had the lowest poverty rates during this period.
- Of the 36,713 families in the AA, 27.9% are designated as LMI and 6.3% of families are living below the poverty level, compared to 9.6% of families living below the poverty level in Ohio.
- Of the 53,748 households in the AA, 30.2% are designated as LMI, 8.1% are below the poverty level, compared to 13.4% of households across Ohio that are below the poverty level.
- Supplemental Nutrition Assistance Program (SNAP)<sup>9</sup> helps LMI individuals and families, the elderly, and the working poor purchase food and reduce food insecurity and may free up resources for other necessities, such as clothing, housing, and medical expenses.

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

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

SNAP Recipients		
Assesment Area: Nonmetropolitan Ohio		
Area	2021	2022
Auglaize County	6.3%	6.1%
Mercer County	4.3%	4.3%
Shelby County	7.8%	8.0%
<b>Ohio</b>	<b>12.6%</b>	<b>12.2%</b>

*Source: Federal Reserve Economic Data | FRED | St. Louis Fed*

- Corresponding with poverty rates, Shelby County had the highest percentage of individuals receiving SNAP benefits and Mercer County had the lowest.

**Housing Characteristics**

Housing Cost Change						
Assesment Area: Nonmetropolitan Ohio						
Area	Median Housing Values			Median Gross Rent		
	2020	2023	Percent Change	2020	2023	Percent Change
Auglaize County	\$146,400	\$182,000	24.3%	\$757	\$853	12.7%
Mercer County	\$163,800	\$208,600	27.4%	\$676	\$812	20.1%
Shelby County	\$147,400	\$190,300	29.1%	\$756	\$904	19.6%
<b>Ohio</b>	<b>\$151,400</b>	<b>\$199,200</b>	<b>31.6%</b>	<b>\$825</b>	<b>\$988</b>	<b>19.8%</b>

*Source: 2019-2023 U.S. Census Bureau: American Community Survey*

- Between 2020 and 2023, median housing values throughout the AA increased between 24.3% to 29.1%, compared to 31.6% in Ohio. MFI increasing by only 1.1% did not keep pace with home price growth. Overall, housing became less affordable across the AA during this period.
- Based on 2020 Census data, the affordability ratio<sup>10</sup> was 42.7 in the AA compared to 38.4 in Ohio. Housing was generally more affordable across the AA than in other parts of Ohio.
- From 2020 to 2023, median gross rent throughout the AA increased between 12.7% to 20.1%. MFI did not keep pace with rent growth during this period. The rise in median gross rents indicates the need for more affordable housing.
- According to 2020 Census data, 30.3% of all renters in the AA had rental costs that were greater than 30.0% of their income.

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

- According to HUD's 2023 Fair Market Rent (FMR) data,<sup>11</sup> average rents for a two-bedroom unit in Auglaize and Mercer counties are \$794, which represents a 7.6% increase from the previous year. Average rent for a two bedroom unit in Shelby County is \$811, which represents a 9.6% increase from the previous year.<sup>12</sup>
- With Ohio’s minimum wage at \$10.45, renters across Ohio can only afford \$543 in monthly rent. The typical minimum wage worker cannot afford rent for a FMR two-bedroom apartment or would have to work 77 hours a week to afford a modest two-bedroom apartment in Ashtabula County.
- According to the National Low Income Housing Coalition,<sup>13</sup> full-time workers must earn at least \$20.81 an hour (\$43,289 annual salary) in Ohio to afford a two-bedroom apartment, which is double the minimum wage in the state. Rents continue to increase nationwide; currently the national average rent in 2024 is \$1,670 a month, which requires workers to earn a minimum wage of \$32.11 (\$66,789 annual salary) to afford a modest two-bedroom rental.<sup>14</sup>
- There are 58,653 housing units in the AA, of which 68.8% are owner-occupied, 22.9% are rentals, and 8.4% are vacant. Housing units in the AA primarily consist of single-family (82.2%) and multi-family (13.1%) dwellings.
- The median age of housing stock in the AA is 57 years old, and 27.4% of housing units were built prior to 1950. The age of housing stock demonstrates a potential need for home improvement lending and refinance or home improvement loans to remove lead-based paint that was commonly used in houses and apartments built before 1978.<sup>15</sup>

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
Auglaize County	43.3%	20.0%	11.2%	71.1%	8.9%	27.5%
Mercer County	55.7%	17.6%	12.5%	66.2%	11.2%	27.5%
Shelby County	53.3%	23.6%	13.4%	70.1%	10.7%	31.7%
<b>Assessment Area</b>	50.5%	20.5%	12.3%	69.5%	10.1%	29.2%
<b>Ohio</b>	60.4%	27.2%	16.1%	71.7%	27.0%	38.6%

*Cost Burden is housing cost that equals 30 percent or more of household income*  
*Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy*

<sup>11</sup> [FY 2023 HUD Fair Market Rent \(FMR\) – Auglaize and Mercer counties](#)

<sup>12</sup> [FY 2023 FMR – Shelby County](#)

<sup>13</sup> [Out of Reach: Ohio | National Low Income Housing Coalition](#)

<sup>14</sup> [National Low Income Housing Coalition – National Average FMR](#)

<sup>15</sup> [Ohio Department of Health – Lead Paint Hazards](#)

- 50.5% of low-income homeowners and 69.5% of low-income renters in the AA are cost burdened, compared to 20.5% of moderate-income homeowners and 10.1% of moderate-income renters in the AA.
- 12.3% of all homeowners and 29.2% of all renters across the AA are cost burdened, compared to 16.1% of all homeowners and 38.6% of all renters across Ohio.
- Across Nonmetropolitan Ohio, 14.5% of all homeowners compared to 38.6% of all renters are cost burdened.
- The data shows cost burden disproportionately affects renter-occupied households, particularly low-income renters as well as low-income homeowners.
- Cost-burdened renters may have a difficult time saving enough money to make a sufficient down payment to purchase a home or otherwise afford increasing rents.
- The community contact indicated cost burdened homeowners and renters are experiencing a severe lack of housing, which leads to above market rate rents and a lack of available affordable housing for LMI borrowers.

Unemployment Rates					
Assessment Area: Nonmetropolitan Ohio					
Area	2020	2021	2022	2023	2024
Auglaize County	7.1%	4.0%	3.2%	2.9%	3.7%
Mercer County	5.6%	3.4%	2.8%	2.5%	3.3%
Shelby County	7.5%	4.2%	3.4%	3.1%	3.9%
<b>Assessment Area</b>	<b>6.7%</b>	<b>3.9%</b>	<b>3.1%</b>	<b>2.8%</b>	<b>3.6%</b>
<b>Ohio</b>	<b>8.2%</b>	<b>5.3%</b>	<b>4.0%</b>	<b>3.7%</b>	<b>4.3%</b>

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

- Unemployment rates were high in 2020 in response to the COVID-19 pandemic. While unemployment rates returned to pre-pandemic levels in 2022, unemployment rates are higher in 2024 compared to 2023. This rise reflects a softening labor market due to factors like higher interest rates.
- According to Ohio Office of Research:<sup>16</sup>
  - Auglaize County
    - Land use is primarily cultivated crops at 74.8% and 10.4% available for lower intensity development.
    - The leading industries are service providing (trade, transportation and utilities; professional and business services; leisure and hospitality; and education and

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

- health services) and goods producing (construction, manufacturing, and natural resources and mining).
- The average private sector weekly wage at \$1,109 indicates employed persons can afford the median rent of \$853.
  - Major employers include: American Trim, Crown Equipment Corp., Grand Lake Health System, KN Rubber, St. Mary's City Schools, Pratt Industries, and Danone Group/Dannon Co.
  - Mercer County
    - Land use is primarily cultivated crops at 77.8%, with only 11.1% available for development.
    - The leading industries are service providing (trade transportation and utilities; professional and business services; and leisure and hospitality) and goods-producing (construction; manufacturing; and natural resources and mining).
    - The average private sector weekly wage at \$978 indicates employed persons can afford the median rent of \$812.
    - Major employers include: Celina Aluminum Precision Technology, Crown Equipment Corp., Mercer Health Hospital, Taylor Communications/Wilmer, Cooper Farms Inc., and Fort Recovery Industries Inc.
  - Shelby County
    - Land use is primarily cultivated crops at 71.4% with only 12.0% available for development.
    - The leading industries are service providing (trade transportation and utilities; professional and business services; education and health services; and leisure and hospitality) and goods producing (manufacturing; construction; and natural resources and mining).
    - The average private sector weekly wage at \$1,204 indicates employed persons can afford the median rent of \$904.
    - Major employers include: Cargill, Freshway Foods, Honda Motor Co. Ltd., Wal-Mart Stores Inc., Wilson Memorial Hospital, and Airstream.
  - Based on 2020 Census data and BroadbandOhio:<sup>17</sup>
    - 83.0% of the populated area and 40.0% of households in Auglaize County do not have access to minimum broadband enabled internet.
    - 81.0% of the populated area and 37.0% of households in Mercer County do not have access to the minimum level of broadband enabled internet.

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

- 80.0% of the populated area and 37% of households in Shelby County do not have access to the minimum level of broadband internet.

Nationally, those with access to a broadband-enabled computer are employed at a higher rate in urban and rural counties.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NONMETROPOLITAN OHIO

### LENDING TEST

Minster's performance relative to the lending test is reasonable.

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

Borrower distribution received greater weight than geographic distribution given the overall percentage of LMI families, and there were no LMI geographies within the AA.

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

#### *HMDA Lending*

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

During the evaluation period, Minster originated 253 HMDA loans totaling \$53.2 million, and 19 (7.5%) HMDA loans were made to borrowers with unknown-income designations. Minster made 6.7% of these loans to borrowers with unknown-income designations, compared to aggregate lending performance at 14.3% in 2023. Minster made 8.3% of these loans to borrowers with unknown-income designations, compared to aggregate lending performance at 17.2% in 2024.

Minster originated seven (2.8%) HMDA loans to low-income borrowers, which was significantly below proxy at 13.6%. The bank's performance at 4.2% fell below aggregate lending performance at 6.6% in 2023 and at 1.5% was significantly below aggregate lending performance at 5.1% in

2024. Minster originated 52 (20.6%) HMDA loans to moderate-income borrowers, which exceeded proxy at 14.3%. The bank’s performance at 23.3% was comparable to aggregate lending performance at 24.3% in 2023 and at 18.0% was slightly below aggregate lending performance at 22.6% in 2024.

Considering these factors along with wages not keeping pace with increasing housing costs and the high percentage of burdened renters, especially low-income renters; borrower distribution of HMDA lending to low-income borrowers is poor and excellent to moderate-income borrowers.

**Small Business Lending**

Minster’s performance was compared to the percentage of small businesses (proxy). Minster originated 49 loans totaling approximately \$10.0 million to businesses, of which five (10.2%) loans were made to businesses of unknown revenues.

**Small Business Loans by Business Revenue & Loan Size**  
Assessment Area: Nonmetropolitan Ohio

		Bank Lending & Demographic Data				
		2024				
		Count		Dollar		Total
		#	%	\$ (000s)	\$ %	Businesses
						%
Revenue	\$1 Million or Less	21	42.9%	2,223	22.3%	87.7%
	Over \$1 Million	23	46.9%	7,610	76.2%	10.6%
	Total Rev. available	44	89.8%	9,834	98.5%	98.3%
	Rev. Not Known	5	10.2%	154	1.5%	1.7%
	Total	49	100%	9,988	100%	100%
Loan Size	\$100,000 or Less	25	51.0%	1,046	10.5%	
	\$100,001 - \$250,000	13	26.5%	2,313	23.2%	
	\$250,001 - \$1 Million	10	20.4%	5,255	52.6%	
	Total	49	100%	9,988	100%	
Loan Size & Rev. \$1	\$100,000 or Less	14	66.7%	620	27.9%	
	\$100,001 - \$250,000	5	23.8%	928	41.7%	
	\$250,001 - \$1 Million	2	9.5%	675	30.4%	
	Total	21	100%	2,223	100%	

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data; 2024 D&B information

Percentages may not total 100 percent due to rounding

Twenty-one (42.9%) loans totaling \$2.2 million were originated to businesses with revenues of \$1.0 million or less, which was significantly below proxy at 87.7%. However, 38 (77.6%) small dollar loans were originated in amounts of \$250,000 or less, indicating a good willingness to lend in smaller amounts typically requested by small businesses. Considering these factors, the distribution among businesses of different sizes is reasonable.

**Consumer Lending**

Consumer loans are comprised of motor vehicle, secured loans, and unsecured loans. Minster’s performance was compared to the percentage of households by household income (proxy). During the evaluation period, Minster originated 66 consumer loans totaling \$1.3 million.

**Borrower Distribution of Consumer Loans  
Assessment Area: Nonmetropolitan Ohio**

Household Income Levels	Bank Lending & Demographic Data 2024				Households by Household Income %
	Count		Dollar		
	#	%	\$ (000s)	\$ %	
Low	5	7.6%	72	5.6%	16.4%
Moderate	23	34.8%	311	24.4%	13.8%
Middle	16	24.2%	232	18.2%	18.7%
Upper	22	33.3%	659	51.7%	51.1%
Unknown	0	0.0%	0	0.0%	
<b>Total</b>	<b>66</b>	<b>100.0%</b>	<b>1,275</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

Percentages may not total 100 percent due to rounding

Minster originated five (7.6%) consumer loans to low-income borrowers, which fell below proxy at 16.4%. Minster originated 23 (34.8%) consumer loans to moderate-income borrowers, which significantly exceeded proxy at 13.8%.

Considering access to transportation is essential for improving upward social mobility for LMI individuals and communities, and unsecured lending is important to LMI borrowers because it provides access to essential funds for managing unexpected expenses; Minster’s borrower distribution of consumer lending to low-income borrowers is reasonable and excellent to moderate-income borrowers.

### Geographic Distribution of Loans

Geographic distribution did not receive much consideration, since the AA has no LMI tracts. The geographic distribution in middle- and upper-income tracts was analyzed and is considered reasonable.

### Lending Penetration

	Nonmetropolitan Ohio - 2023				Nonmetropolitan Ohio - 2024			
	# Tracts	Tracts w/ no loans	Tracts w/ Loans	Penetration	# Tracts	Tracts w/ no loans	Tracts w/ Loans	Penetration
Low	0	0	0	No Tracts	0	0	0	No Tracts
Moderate	0	0	0	No Tracts	0	0	0	No Tracts
Middle	16	3	13	81.3%	16	0	16	100.0%
Upper	14	3	11	78.6%	14	0	14	100.0%
Unknown	0	0	0	No Tracts	0	0	0	No Tracts
<b>Total</b>	<b>30</b>	<b>6</b>	<b>24</b>	<b>80.0%</b>	<b>30</b>	<b>0</b>	<b>30</b>	<b>100.0%</b>

During the evaluation period, Minster penetrated 90.0% of the AA’s total tracts, which is a low level of lending gaps.

### COMMUNITY DEVELOPMENT TEST

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

#### *Community Development Loans*

Minster originated two community development loans totaling approximately \$1.5 million to a small business to purchase and renovate a building to serve as a new daycare center in a rural community. This loan supports economic development. Funds from this loan helped stimulate job growth by creating eight to 10 new jobs for LMI workers. This loan is responsive to credit needs in the AA. According to the National Advisory Committee on Rural Health and Human

Services,<sup>18</sup> children under five years old living in rural communities make up nearly a quarter of children eligible for childcare services but over half live in childcare deserts.

### *Community Development Investments*

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

<b>Purpose of Donation</b>	<b>#</b>	<b>\$</b>
Services to LMI	15	\$26,106
Economic Development	6	\$4,600
Affordable Housing	1	\$157
<b>Total</b>	<b>22</b>	<b>\$30,863</b>

Impactful donations include:

- \$10,750 (three donations) to a nonprofit organization that provides after-school programs, youth sports, and summer camps for LMI children and education and job training programs and wellness initiatives for LMI adults.
- \$4,000 (four donations) to a nonprofit that provides funding to support small business development.
- \$2,350 (three donations) to an organization that connects residents with essential services, supports other local organizations, and addresses key issues through initiatives like emergency food programs, job training, and youth development.

### *Community Development Services*

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

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<sup>18</sup> [Childcare Need and Availability in Rural Areas January 2023](#)

Purpose of CD Service	# Services	# Organizations	# Employees*	# Hours
Services to LMI	7	3	4	183
Economic Development	2	2	2	156
Affordable Housing	2	1	1	120
<b>Total</b>	<b>11</b>	<b>6</b>	<b>7</b>	<b>459</b>
<i>*Some employees may be double-counted if performed more than one service</i>				

Employees were involved with organizations and activities that promote community services targeted to LMI individuals and to a lesser extent economic development and affordable housing. Bank officers and employees worked with a variety of community service organizations, throughout the AA during the evaluation period. Most of Minster’s community development services are serving on boards and committees and providing financial literacy education. Service hours represent 23.7% of total community development services.

**Serving on Boards and Committees**

- Two employees served as board members for two organizations that support small business development.
- One employee served as a board member for a large nonprofit organization that supports affordable housing initiatives for LMI individuals and families.
- One employee served as a board member for a large nonprofit organization that provides wraparound services to LMI individuals and families.

**Financial Literacy**

- Two employees partnered with two schools to provide financial literacy training to LMI students.

Minster is committed to the providing financial literacy education to its customers and communities. As a result, multiple employees spend their time and resources providing financial literacy training at several schools across the AA. However, these services are not eligible for CRA credit, since the majority of students are not considered LMI.

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

**DESCRIPTION OF INSTITUTION’S OPERATIONS**

- **Dayton-Kettering-Beavercreek MSA**
  - As of December 31, 2024, Minster operated two branches, representing 28.6% of its total branches.
  - As of June 30, 2024, Minster had \$86.3 million in deposits in this AA, representing a market share of 13.1%.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

Using available facts and data, including performance and demographic information, the AA performance was evaluated and compared with Minster’s overall performance. The conclusions regarding performance are provided in the tables below. Refer to the tables in Appendices B and C for demographic and lending information in this AA.

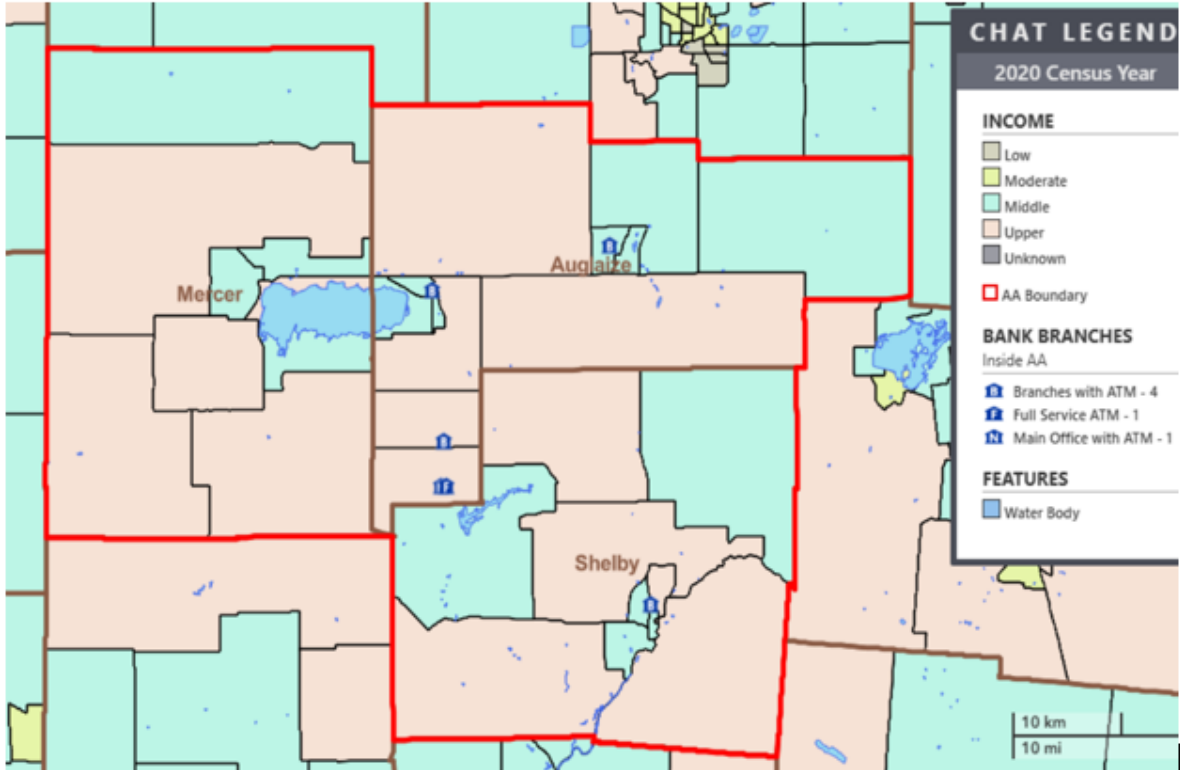
Assessment Area	Lending Test	Community Development Test
Dayton MSA	Consistent	Consistent
<i>The performance in the limited-scope AAs did not impact the overall rating</i>		

For the lending test, Minster received a Satisfactory rating. Performance in the Dayton AA is consistent with Minster’s overall performance. Borrower distribution (which received more weight) is reasonable. HMDA lending is reasonable, and lending to businesses of different sizes is reasonable. Geographic distribution is excellent. HMDA lending is excellent, and small business lending is reasonable. There was insufficient loan volume to evaluate consumer lending in the Dayton AA.

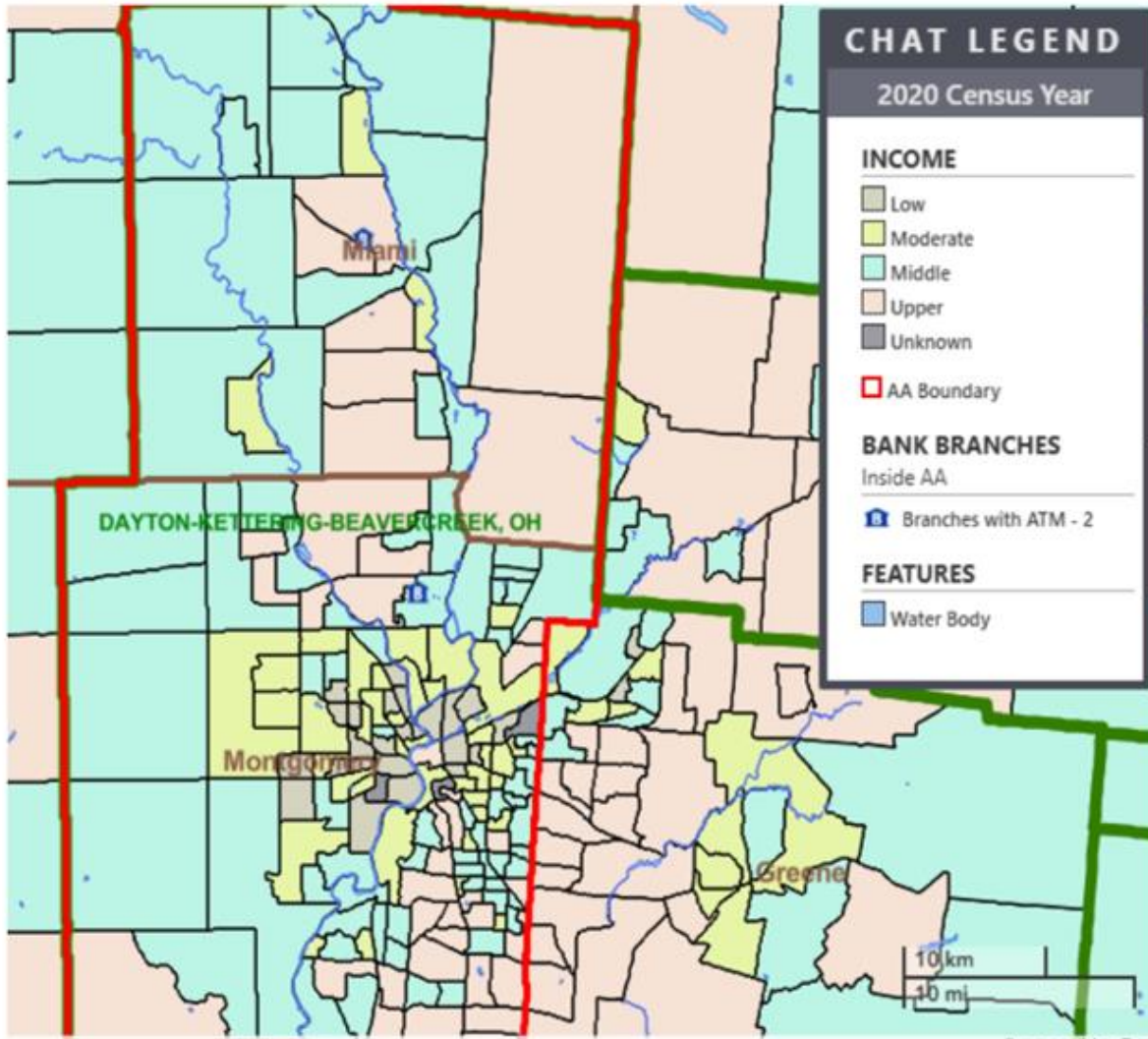
For the community development test, Minster received an Outstanding rating. Performance in the Dayton AA is consistent compared to Minster’s overall performance. This level of performance is primarily due to the excellent responsiveness to community development needs and increased level of community development activities, considering Minster’s capacity in this competitive market.

### Appendix A – Assessment Area Maps

#### 2023-2024 Nonmetropolitan Ohio



2023-2024 Dayton-Kettering-Beavercreek, OH MSA



Appendix B – Demographic Tables

Combined Demographics Report  
Assessment Area: Nonmetropolitan Ohio

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	4,994	13.6%
Moderate-income	0	0.0%	0	0.0%	0	0.0%	5,244	14.3%
Middle-income	16	53.3%	17,284	47.1%	1,496	8.7%	7,963	21.7%
Upper-income	14	46.7%	19,429	52.9%	814	4.2%	18,512	50.4%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total Assessment Area</b>	<b>30</b>	<b>100.0%</b>	<b>36,713</b>	<b>100.0%</b>	<b>2,310</b>	<b>6.3%</b>	<b>36,713</b>	<b>100.0%</b>
	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	29,802	18,528	45.9%	62.2%	8,217	27.6%	3,057	10.3%
Upper-income	28,851	21,813	54.1%	75.6%	5,190	18.0%	1,848	6.4%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
<b>Total Assessment Area</b>	<b>58,653</b>	<b>40,341</b>	<b>100.0%</b>	<b>68.8%</b>	<b>13,407</b>	<b>22.9%</b>	<b>4,905</b>	<b>8.4%</b>
	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	2,253	45.1%	1,976	45.1%	239	45.2%	38	43.7%
Upper-income	2,740	54.9%	2,401	54.9%	290	54.8%	49	56.3%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total Assessment Area</b>	<b>4,993</b>	<b>100.0%</b>	<b>4,377</b>	<b>100.0%</b>	<b>529</b>	<b>100.0%</b>	<b>87</b>	<b>100.0%</b>
<b>Percentage of Total</b>			<b>87.7%</b>		<b>10.6%</b>		<b>1.7%</b>	
	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	171	23.7%	169	23.8%	2	18.2%	0	0.0%
Upper-income	551	76.3%	540	76.2%	9	81.8%	2	100.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total Assessment Area</b>	<b>722</b>	<b>100.0%</b>	<b>709</b>	<b>100.0%</b>	<b>11</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>
<b>Percentage of Total</b>			<b>98.2%</b>		<b>1.5%</b>		<b>0.3%</b>	

Based on 2024 FFIEC Census Data and 2024 D&B Information

Combined Demographics Report

Assessment Area: OH Dayton-Kettering-Beavercreek MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	24	13.4%	13,998	8.7%	4,361	31.2%	37,011	23.0%
Moderate-income	42	23.5%	32,192	20.0%	6,337	19.7%	28,098	17.5%
Middle-income	71	39.7%	71,347	44.4%	4,733	6.6%	34,453	21.4%
Upper-income	39	21.8%	42,524	26.4%	1,378	3.2%	61,238	38.1%
Unknown-income	3	1.7%	739	0.5%	303	41.0%	0	0.0%
<b>Total Assessment Area</b>	<b>179</b>	<b>100.0%</b>	<b>160,800</b>	<b>100.0%</b>	<b>17,112</b>	<b>10.6%</b>	<b>160,800</b>	<b>100.0%</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	35,615	10,424	6.2%	29.3%	15,866	44.5%	9,325	26.2%
Moderate-income	71,121	31,336	18.5%	44.1%	30,620	43.1%	9,165	12.9%
Middle-income	123,278	78,595	46.5%	63.8%	36,321	29.5%	8,362	6.8%
Upper-income	67,178	48,302	28.6%	71.9%	15,381	22.9%	3,495	5.2%
Unknown-income	2,133	507	0.3%	23.8%	985	46.2%	641	30.1%
<b>Total Assessment Area</b>	<b>299,325</b>	<b>169,164</b>	<b>100.0%</b>	<b>56.5%</b>	<b>99,173</b>	<b>33.1%</b>	<b>30,988</b>	<b>10.4%</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	2,352	8.8%	2,112	8.7%	229	10.4%	11	5.7%
Moderate-income	5,329	20.0%	4,802	19.8%	501	22.8%	26	13.5%
Middle-income	10,461	39.2%	9,609	39.6%	767	34.9%	85	44.3%
Upper-income	8,352	31.3%	7,595	31.3%	687	31.3%	70	36.5%
Unknown-income	159	0.6%	145	0.6%	14	0.6%	0	0.0%
<b>Total Assessment Area</b>	<b>26,653</b>	<b>100.0%</b>	<b>24,263</b>	<b>100.0%</b>	<b>2,198</b>	<b>100.0%</b>	<b>192</b>	<b>100.0%</b>
	Percentage of Total Businesses:			91.0%		8.2%		0.7%
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	7	1.7%	7	1.8%	0	0.0%	0	0.0%
Moderate-income	34	8.4%	33	8.3%	1	12.5%	0	0.0%
Middle-income	241	59.2%	234	58.8%	7	87.5%	0	0.0%
Upper-income	124	30.5%	123	30.9%	0	0.0%	1	100.0%
Unknown-income	1	0.2%	1	0.3%	0	0.0%	0	0.0%
<b>Total Assessment Area</b>	<b>407</b>	<b>100.0%</b>	<b>398</b>	<b>100.0%</b>	<b>8</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>
	Percentage of Total			97.8%		2.0%		0.2%

Based on 2024 FFIEC Census Data and 2024 D&B Information

Appendix C –Lending Tables

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												
		2023, 2024				2023				2024								
		Bank		Families by Family Income %	Count		Dollar		Count		Dollar							
		Count	Dollar		Bank	Agg	Bank	Agg	Bank	Agg								
#	%	\$ (000s)	\$ %	#	%	Agg	\$ (000s)	\$ %	\$ %	#	%	Agg	\$ (000s)	\$ %	\$ %			
HOME PURCHASE	Low	6	2.9%	619	1.4%	13.6%	4	4.0%	6.0%	420	2.1%	3.2%	2	1.9%	4.6%	199	0.8%	2.5%
	Moderate	45	21.7%	6,271	13.7%	14.3%	24	24.2%	26.0%	3,005	14.7%	19.5%	21	19.4%	23.6%	3,266	12.9%	17.0%
	Middle	56	27.1%	10,904	23.8%	21.7%	22	22.2%	22.7%	4,280	20.9%	22.2%	34	31.5%	22.7%	6,624	26.2%	20.9%
	Upper	85	41.1%	25,506	55.8%	50.4%	43	43.4%	24.4%	12,054	58.9%	34.6%	42	38.9%	25.9%	13,452	53.2%	38.5%
	Unknown	15	7.2%	2,428	5.3%	0.0%	6	6.1%	20.9%	706	3.4%	20.5%	9	8.3%	23.3%	1,722	6.8%	21.0%
	<b>Total</b>	<b>207</b>	<b>100%</b>	<b>45,728</b>	<b>100%</b>	<b>100.0%</b>	<b>99</b>	<b>100%</b>	<b>100%</b>	<b>20,465</b>	<b>100%</b>	<b>100%</b>	<b>103</b>	<b>100%</b>	<b>100%</b>	<b>25,263</b>	<b>100%</b>	<b>100%</b>
HOME REFINANCE	Low	1	3.4%	55	1.1%	13.6%	1	6.3%	8.2%	55	1.9%	5.3%	0	0.0%	6.4%	0	0.0%	3.5%
	Moderate	4	13.8%	450	8.7%	14.3%	2	12.5%	23.7%	220	7.7%	18.5%	2	15.4%	22.3%	230	9.9%	17.4%
	Middle	6	20.7%	873	16.9%	21.7%	3	18.8%	25.8%	497	17.4%	22.6%	3	23.1%	25.2%	376	16.2%	21.9%
	Upper	15	51.7%	3,462	66.8%	50.4%	9	56.3%	35.4%	1,980	69.4%	46.2%	6	46.2%	29.1%	1,482	63.7%	34.6%
	Unknown	3	10.3%	340	6.6%	0.0%	1	6.3%	6.8%	100	3.5%	7.4%	2	15.4%	16.9%	240	10.3%	22.5%
	<b>Total</b>	<b>29</b>	<b>100%</b>	<b>5,180</b>	<b>100%</b>	<b>100.0%</b>	<b>16</b>	<b>100%</b>	<b>100%</b>	<b>2,852</b>	<b>100%</b>	<b>100%</b>	<b>13</b>	<b>100%</b>	<b>100%</b>	<b>2,328</b>	<b>100%</b>	<b>100%</b>
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	13.6%	0	0.0%	5.4%	0	0.0%	3.5%	0	0.0%	3.8%	0	0.0%	1.4%
	Moderate	2	33.3%	128	14.2%	14.3%	2	100.0%	19.8%	128	100.0%	14.1%	0	0.0%	20.3%	0	0.0%	11.7%
	Middle	1	16.7%	45	5.0%	21.7%	0	0.0%	27.2%	0	0.0%	23.2%	1	25.0%	23.4%	45	5.8%	18.3%
	Upper	3	50.0%	730	80.8%	50.4%	0	0.0%	46.3%	0	0.0%	58.1%	3	75.0%	51.3%	730	94.2%	67.5%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	1.2%	0	0.0%	1.0%	0	0.0%	1.1%	0	0.0%	1.1%
	<b>Total</b>	<b>6</b>	<b>100%</b>	<b>903</b>	<b>100%</b>	<b>100.0%</b>	<b>2</b>	<b>100%</b>	<b>100%</b>	<b>128</b>	<b>100%</b>	<b>100%</b>	<b>4</b>	<b>100%</b>	<b>100%</b>	<b>775</b>	<b>100%</b>	<b>100%</b>
MULTI FAMILY	Low	0	0.0%	0	0.0%	13.6%	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%	14.3%	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%	21.7%	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%	50.4%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	1	100.0%	360	100.0%	0.0%	1	100.0%	100.0%	360	100.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%
	<b>Total</b>	<b>1</b>	<b>100%</b>	<b>360</b>	<b>100%</b>	<b>100.0%</b>	<b>1</b>	<b>100%</b>	<b>100%</b>	<b>360</b>	<b>100%</b>	<b>100%</b>	<b>0</b>	<b>0.0%</b>	<b>100%</b>	<b>0</b>	<b>0.0%</b>	<b>100%</b>
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	13.6%	0	0.0%	7.8%	0	0.0%	2.9%	0	0.0%	4.8%	0	0.0%	3.1%
	Moderate	0	0.0%	0	0.0%	14.3%	0	0.0%	17.5%	0	0.0%	12.3%	0	0.0%	21.0%	0	0.0%	18.8%
	Middle	0	0.0%	0	0.0%	21.7%	0	0.0%	27.2%	0	0.0%	32.4%	0	0.0%	31.5%	0	0.0%	31.7%
	Upper	0	0.0%	0	0.0%	50.4%	0	0.0%	44.7%	0	0.0%	50.4%	0	0.0%	39.5%	0	0.0%	44.6%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	2.9%	0	0.0%	2.0%	0	0.0%	3.2%	0	0.0%	1.8%
	<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>100%</b>	<b>0</b>	<b>0.0%</b>	<b>100%</b>	<b>0</b>	<b>0.0%</b>	<b>100%</b>

Originations & Purchases

Based on 2024 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											
		2023, 2024					2023					2024						
		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/EXEMP	Low	0	0.0%	0	0.0%	13.6%	0	0.0%	8.9%	0	0.0%	7.5%	0	0.0%	7.0%	0	0.0%	4.2%
	Moderate	1	10.0%	25	2.3%	14.3%	0	0.0%	24.7%	0	0.0%	22.0%	1	12.5%	22.0%	25	2.7%	18.2%
	Middle	1	10.0%	100	9.4%	21.7%	0	0.0%	21.5%	0	0.0%	17.3%	1	12.5%	29.0%	100	10.9%	26.5%
	Upper	8	80.0%	943	88.3%	50.4%	2	100.0%	43.7%	150	100.0%	51.9%	6	75.0%	39.8%	793	86.4%	48.8%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	1.3%	0	0.0%	1.2%	0	0.0%	2.2%	0	0.0%	2.3%
	<b>Total</b>	<b>10</b>	<b>100%</b>	<b>1,068</b>	<b>100%</b>	<b>100.0%</b>	<b>2</b>	<b>100%</b>	<b>100%</b>	<b>150</b>	<b>100%</b>	<b>100%</b>	<b>8</b>	<b>100%</b>	<b>100%</b>	<b>918</b>	<b>100%</b>	<b>100%</b>
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	13.6%	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%	14.3%	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%	21.7%	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%	50.4%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%
	<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>100%</b>	<b>0</b>	<b>0.0%</b>	<b>100%</b>	<b>0</b>	<b>0.0%</b>	<b>100%</b>
HMDA TOTALS	Low	7	2.8%	674	1.3%	13.6%	5	4.2%	6.6%	475	2.0%	3.7%	2	1.5%	5.1%	199	0.7%	2.7%
	Moderate	52	20.6%	6,874	12.9%	14.3%	28	23.3%	24.3%	3,353	14.0%	18.9%	24	18.0%	22.6%	3,521	12.0%	16.6%
	Middle	64	25.3%	11,922	22.4%	21.7%	25	20.8%	23.8%	4,777	19.9%	22.3%	39	29.3%	24.2%	7,145	24.4%	21.0%
	Upper	111	43.9%	30,641	57.6%	50.4%	54	45.0%	31.0%	14,184	59.2%	38.2%	57	42.9%	30.9%	16,457	56.2%	38.9%
	Unknown	19	7.5%	3,128	5.9%	0.0%	8	6.7%	14.3%	1,166	4.9%	16.9%	11	8.3%	17.2%	1,962	6.7%	20.7%
	<b>Total</b>	<b>253</b>	<b>100%</b>	<b>53,239</b>	<b>100%</b>	<b>100.0%</b>	<b>120</b>	<b>100%</b>	<b>100%</b>	<b>23,955</b>	<b>100%</b>	<b>100%</b>	<b>133</b>	<b>100%</b>	<b>100%</b>	<b>29,284</b>	<b>100%</b>	<b>100%</b>

Originations & Purchases

Based on 2024 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												
		2023, 2024					2023					2024						
		Bank		Occupied Units %	Count	Dollar \$ (000s) \$ %	Count		Dollar			Count		Dollar				
		#	%				Bank #	Agg %	Bank \$ (000s)	Agg \$ %	Bank #	Agg %	Bank \$ (000s)	Agg \$ %				
HOME PURCHASE	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	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	84	40.6%	16,063	35.1%	45.9%	46	46.5%	61.0%	8,258	40.4%	57.2%	38	35.2%	59.3%	7,805	30.9%	54.6%
	Upper	123	59.4%	29,665	64.9%	54.1%	53	53.5%	39.0%	12,207	59.6%	42.8%	70	64.8%	40.7%	17,458	69.1%	45.4%
	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%
	<b>Total</b>	<b>207</b>	<b>100%</b>	<b>45,728</b>	<b>100%</b>	<b>100.0%</b>	<b>99</b>	<b>100%</b>	<b>100%</b>	<b>20,465</b>	<b>100%</b>	<b>100%</b>	<b>108</b>	<b>100%</b>	<b>100%</b>	<b>25,263</b>	<b>100%</b>	<b>100%</b>
HOME 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	14	48.3%	2,405	46.4%	45.9%	9	56.3%	53.4%	1,538	53.9%	47.8%	5	38.5%	49.7%	867	37.2%	47.8%
	Upper	15	51.7%	2,775	53.6%	54.1%	7	43.8%	46.6%	1,314	46.1%	52.2%	8	61.5%	50.3%	1,461	62.8%	52.2%
	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%
	<b>Total</b>	<b>29</b>	<b>100%</b>	<b>5,180</b>	<b>100%</b>	<b>100.0%</b>	<b>16</b>	<b>100%</b>	<b>100%</b>	<b>2,852</b>	<b>100%</b>	<b>100%</b>	<b>13</b>	<b>100%</b>	<b>100%</b>	<b>2,328</b>	<b>100%</b>	<b>100%</b>
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	2	33.3%	128	14.2%	45.9%	1	50.0%	58.0%	83	64.8%	49.0%	1	25.0%	46.7%	45	5.8%	40.2%
	Upper	4	66.7%	775	85.8%	54.1%	1	50.0%	42.0%	45	35.2%	51.0%	3	75.0%	53.3%	730	94.2%	59.8%
	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%
	<b>Total</b>	<b>6</b>	<b>100%</b>	<b>903</b>	<b>100%</b>	<b>100.0%</b>	<b>2</b>	<b>100%</b>	<b>100%</b>	<b>128</b>	<b>100%</b>	<b>100%</b>	<b>4</b>	<b>100%</b>	<b>100%</b>	<b>775</b>	<b>100%</b>	<b>100%</b>
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%	68.3%	0	0.0%	50.0%	0	0.0%	21.7%	0	0.0%	100.0%	0	0.0%	100.0%
	Upper	1	100.0%	360	100.0%	31.7%	1	100.0%	50.0%	360	100.0%	78.3%	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%
	<b>Total</b>	<b>1</b>	<b>100%</b>	<b>360</b>	<b>100%</b>	<b>100.0%</b>	<b>1</b>	<b>100%</b>	<b>100%</b>	<b>360</b>	<b>100%</b>	<b>100%</b>	<b>0</b>	<b>0.0%</b>	<b>100%</b>	<b>0</b>	<b>0.0%</b>	<b>100%</b>
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	0	0.0%	0	0.0%	45.9%	0	0.0%	59.2%	0	0.0%	51.8%	0	0.0%	49.2%	0	0.0%	44.1%
	Upper	0	0.0%	0	0.0%	54.1%	0	0.0%	40.8%	0	0.0%	48.2%	0	0.0%	50.8%	0	0.0%	55.9%
	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%
	<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>100%</b>	<b>0</b>	<b>0.0%</b>	<b>100%</b>	<b>0</b>	<b>0.0%</b>	<b>100%</b>

Originations & Purchases

Based on 2024 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											
		2023, 2024					2023					2024						
		Bank		Owner Occupied Units	Count		Dollar			Count		Dollar						
		#	%		\$ (000s)	\$ %	%	#	%	\$ (000s)	\$ %	\$ %	#	%	\$ (000s)	\$ %	\$ %	
OTHER PURPOSE	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	2	20.0%	320	30.0%	45.9%	1	50.0%	57.6%	50	33.3%	53.1%	1	12.5%	54.3%	270	29.4%	54.5%
	Upper	8	80.0%	748	70.0%	54.1%	1	50.0%	42.4%	100	66.7%	46.9%	7	87.5%	45.7%	648	70.6%	45.5%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	<b>Total</b>	<b>10</b>	<b>100%</b>	<b>1,068</b>	<b>100%</b>	<b>100.0%</b>	<b>2</b>	<b>100%</b>	<b>100%</b>	<b>150</b>	<b>100%</b>	<b>100%</b>	<b>8</b>	<b>100%</b>	<b>100%</b>	<b>918</b>	<b>100%</b>	<b>100%</b>
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%	45.9%	0	0.0%	60.0%	0	0.0%	73.1%	0	0.0%	83.3%	0	0.0%	91.6%
	Upper	0	0.0%	0	0.0%	54.1%	0	0.0%	40.0%	0	0.0%	26.9%	0	0.0%	16.7%	0	0.0%	8.4%
	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%
	<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>100%</b>	<b>0</b>	<b>0.0%</b>	<b>100%</b>	<b>0</b>	<b>0.0%</b>	<b>100%</b>
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	102	40.3%	18,916	35.5%	45.9%	57	47.5%	58.9%	9,929	41.4%	55.1%	45	33.8%	55.1%	8,987	30.7%	53.2%
	Upper	151	59.7%	34,323	64.5%	54.1%	63	52.5%	41.1%	14,026	58.6%	44.9%	88	66.2%	44.9%	20,297	69.3%	46.8%
	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%
	<b>Total</b>	<b>253</b>	<b>100%</b>	<b>53,239</b>	<b>100%</b>	<b>100.0%</b>	<b>120</b>	<b>100%</b>	<b>100%</b>	<b>23,955</b>	<b>100%</b>	<b>100%</b>	<b>133</b>	<b>100%</b>	<b>100%</b>	<b>29,284</b>	<b>100%</b>	<b>100%</b>

Originations & Purchases

Based on 2024 FFIEC Census Data, 2016-2020 ACS data

Borrower Distribution of HMDA Loans - Table 1 of 2  
Assessment Area: OH Dayton-Kettering-Beavercreek MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2023, 2024					2023					2024						
		Bank				Families by Family Income %	Count		Dollar			Count		Dollar				
		Count #	%	Dollar \$(000s)	%		Bank #	Agg %	Bank \$(000s)	%	Agg %	Bank #	Agg %	Bank \$(000s)	%	Agg %		
HOME PURCHASE	Low	4	8.5%	438	4.6%	23.0%	3	12.5%	10.5%	310	6.5%	5.5%	1	4.3%	8.9%	128	2.7%	4.6%
	Moderate	12	25.5%	1,916	20.0%	17.5%	6	25.0%	21.5%	901	18.8%	16.4%	6	26.1%	23.6%	1,015	21.3%	17.5%
	Middle	7	14.9%	1,162	12.1%	21.4%	4	16.7%	21.7%	585	12.2%	21.7%	3	13.0%	20.1%	577	12.1%	20.2%
	Upper	11	23.4%	3,977	41.6%	38.1%	8	33.3%	24.9%	2,723	56.7%	35.4%	3	13.0%	25.2%	1,254	26.3%	35.1%
	Unknown	13	27.7%	2,071	21.7%	0.0%	3	12.5%	21.4%	284	5.9%	20.9%	10	43.5%	22.2%	1,787	37.5%	22.6%
	<b>Total</b>	<b>47</b>	<b>100%</b>	<b>3,564</b>	<b>100%</b>	<b>100.0%</b>	<b>24</b>	<b>100%</b>	<b>100%</b>	<b>4,803</b>	<b>100%</b>	<b>100%</b>	<b>23</b>	<b>100%</b>	<b>100%</b>	<b>4,761</b>	<b>100%</b>	<b>100%</b>
REFINANCE	Low	2	10.0%	122	3.8%	23.0%	2	14.3%	17.3%	122	6.6%	10.6%	0	0.0%	12.4%	0	0.0%	6.0%
	Moderate	1	5.0%	118	3.7%	17.5%	1	7.1%	22.7%	118	6.4%	18.7%	0	0.0%	18.8%	0	0.0%	13.3%
	Middle	5	25.0%	596	18.7%	21.4%	4	28.6%	22.0%	328	17.8%	22.4%	1	16.7%	18.7%	268	19.8%	16.6%
	Upper	7	35.0%	1,357	42.5%	38.1%	3	21.4%	25.0%	347	18.9%	31.9%	4	66.7%	25.1%	1,010	74.5%	29.7%
	Unknown	5	25.0%	1,002	31.4%	0.0%	4	28.6%	13.0%	924	50.2%	16.4%	1	16.7%	25.0%	78	5.8%	34.3%
	<b>Total</b>	<b>20</b>	<b>100%</b>	<b>3,195</b>	<b>100%</b>	<b>100.0%</b>	<b>14</b>	<b>100%</b>	<b>100%</b>	<b>1,839</b>	<b>100%</b>	<b>100%</b>	<b>6</b>	<b>100%</b>	<b>100%</b>	<b>1,356</b>	<b>100%</b>	<b>100%</b>
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	23.0%	0	0.0%	13.9%	0	0.0%	9.1%	0	0.0%	12.9%	0	0.0%	7.3%
	Moderate	0	0.0%	0	0.0%	17.5%	0	0.0%	22.4%	0	0.0%	17.8%	0	0.0%	21.6%	0	0.0%	16.3%
	Middle	0	0.0%	0	0.0%	21.4%	0	0.0%	26.2%	0	0.0%	24.3%	0	0.0%	28.4%	0	0.0%	26.8%
	Upper	0	0.0%	0	0.0%	38.1%	0	0.0%	36.0%	0	0.0%	46.6%	0	0.0%	34.8%	0	0.0%	46.6%
	Unknown	2	100.0%	426	100.0%	0.0%	0	0.0%	1.5%	0	0.0%	2.2%	2	100.0%	2.3%	426	100.0%	3.0%
	<b>Total</b>	<b>2</b>	<b>100%</b>	<b>426</b>	<b>100%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100%</b>	<b>0</b>	<b>0.0%</b>	<b>100%</b>	<b>2</b>	<b>100%</b>	<b>100%</b>	<b>426</b>	<b>100%</b>	<b>100%</b>
MULTI FAMILY	Low	0	0.0%	0	0.0%	23.0%	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%	17.5%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	21.4%	0	0.0%	1.1%	0	0.0%	0.1%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	38.1%	0	0.0%	4.6%	0	0.0%	0.9%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	5	100.0%	2,410	100.0%	0.0%	1	100.0%	94.3%	483	100.0%	99.0%	4	100.0%	100.0%	1,927	100.0%	100.0%
	<b>Total</b>	<b>5</b>	<b>100%</b>	<b>2,410</b>	<b>100%</b>	<b>100.0%</b>	<b>1</b>	<b>100%</b>	<b>100%</b>	<b>483</b>	<b>100%</b>	<b>100%</b>	<b>4</b>	<b>100%</b>	<b>100%</b>	<b>1,927</b>	<b>100%</b>	<b>100%</b>
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	23.0%	0	0.0%	14.0%	0	0.0%	8.6%	0	0.0%	10.4%	0	0.0%	6.4%
	Moderate	0	0.0%	0	0.0%	17.5%	0	0.0%	21.5%	0	0.0%	15.5%	0	0.0%	25.2%	0	0.0%	18.4%
	Middle	0	0.0%	0	0.0%	21.4%	0	0.0%	26.4%	0	0.0%	21.4%	0	0.0%	23.7%	0	0.0%	21.6%
	Upper	0	0.0%	0	0.0%	38.1%	0	0.0%	34.5%	0	0.0%	51.9%	0	0.0%	37.1%	0	0.0%	50.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	3.6%	0	0.0%	2.7%	0	0.0%	3.7%	0	0.0%	3.6%
	<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>100%</b>	<b>0</b>	<b>0.0%</b>	<b>100%</b>	<b>0</b>	<b>0.0%</b>	<b>100%</b>

Originations & Purchases  
Based on 2024 FFIEC Census Data; 2016-2020 ACS data

Borrower Distribution of HMDA Loans - Table 2 of 2  
Assessment Area: OH Dayton-Kettering-Beavercreek MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2023, 2024					2023					2024						
		Bank				Families by Family Income %	Count		Dollar			Count		Dollar				
		Count	Dollar				Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$(000s)	\$%	%	#	%	%	\$(000s)	\$%	\$%	#	%	%	\$(000s)	\$%	\$%		
OTHER PURPOSE CLOSE/EXEMPT	Low	0	0.0%	0	0.0%	23.0%	0	0.0%	12.4%	0	0.0%	9.0%	0	0.0%	13.9%	0	0.0%	9.5%
	Moderate	0	0.0%	0	0.0%	17.5%	0	0.0%	23.6%	0	0.0%	18.6%	0	0.0%	28.6%	0	0.0%	22.4%
	Middle	0	0.0%	0	0.0%	21.4%	0	0.0%	25.3%	0	0.0%	22.5%	0	0.0%	22.2%	0	0.0%	19.9%
	Upper	1	100.0%	200	100.0%	38.1%	0	0.0%	34.3%	0	0.0%	43.3%	1	100.0%	30.5%	200	100.0%	38.9%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	4.4%	0	0.0%	6.1%	0	0.0%	4.7%	0	0.0%	9.3%
	Total	1	100%	200	100%	100.0%	0	0.0%	100%	0	0.0%	100%	1	100%	100%	200	100%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	23.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	12.7%	0	0.0%	7.6%
	Moderate	0	0.0%	0	0.0%	17.5%	0	0.0%	1.5%	0	0.0%	1.3%	0	0.0%	1.8%	0	0.0%	1.5%
	Middle	0	0.0%	0	0.0%	21.4%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	1.8%	0	0.0%	4.7%
	Upper	0	0.0%	0	0.0%	38.1%	0	0.0%	1.5%	0	0.0%	3.0%	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%	95.6%	0	0.0%	83.6%	0	0.0%	86.1%
	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%
HMDA TOTALS	Low	6	8.0%	560	3.5%	23.0%	5	12.8%	12.1%	432	6.1%	5.9%	1	2.8%	10.3%	128	1.5%	4.6%
	Moderate	13	17.3%	2,034	12.9%	17.5%	7	17.9%	21.7%	1,019	14.3%	15.3%	6	16.7%	22.5%	1,015	11.7%	15.1%
	Middle	12	16.0%	1,758	11.1%	21.4%	8	20.5%	22.4%	913	12.8%	20.0%	4	11.1%	20.7%	845	9.7%	17.9%
	Upper	19	25.3%	5,534	35.0%	38.1%	11	28.2%	26.8%	3,070	43.1%	32.8%	8	22.2%	26.7%	2,464	28.4%	31.4%
	Unknown	25	33.3%	5,909	37.4%	0.0%	8	20.5%	16.9%	1,691	23.7%	25.9%	17	47.2%	19.9%	4,218	48.7%	31.0%
	Total	75	100%	15,795	100%	100.0%	39	100%	100%	7,125	100%	100%	36	100%	100%	8,670	100%	100%

Originations & Purchases  
Based on 2024 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of HMDA Loans - Table 1 of 2  
Assessment Area: OH Dayton-Kettering-Beavercreek MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2023, 2024					2023					2024						
		Bank				Owner Occupied Units %	Count		Dollar			Count		Dollar				
		Count #	%	Dollar \$ (000s)	%		Bank #	Agg %	Dollar \$ (000s)	%	Agg %	Bank #	Agg %	Dollar \$ (000s)	%	Agg %		
HOME PURCHASE	Low	1	2.1%	98	1.0%	6.2%	1	4.2%	5.9%	98	2.0%	3.2%	0	0.0%	6.3%	0	0.0%	3.3%
	Moderate	11	23.4%	1,113	11.6%	18.5%	5	20.8%	20.3%	370	7.7%	14.3%	6	26.1%	18.7%	743	15.6%	12.9%
	Middle	19	40.4%	3,722	38.9%	46.5%	10	41.7%	46.1%	2,191	45.6%	44.1%	9	39.1%	47.8%	1,531	32.2%	45.9%
	Upper	16	34.0%	4,631	48.4%	28.6%	8	33.3%	27.6%	2,144	44.6%	38.4%	8	34.8%	27.0%	2,487	52.2%	37.7%
	Unknown	0	0.0%	0	0.0%	0.3%	0	0.0%	0.2%	0	0.0%	0.1%	0	0.0%	0.2%	0	0.0%	0.1%
	<b>Total</b>	<b>47</b>	<b>100%</b>	<b>3,564</b>	<b>100%</b>	<b>100.0%</b>	<b>24</b>	<b>100%</b>	<b>100%</b>	<b>4,803</b>	<b>100%</b>	<b>100%</b>	<b>23</b>	<b>100%</b>	<b>100%</b>	<b>4,761</b>	<b>100%</b>	<b>100%</b>
REFINANCE	Low	3	15.0%	241	7.5%	6.2%	2	14.3%	4.6%	163	8.9%	3.3%	1	16.7%	4.9%	78	5.8%	4.1%
	Moderate	2	10.0%	228	7.1%	18.5%	2	14.3%	16.7%	228	12.4%	13.1%	0	0.0%	16.3%	0	0.0%	12.5%
	Middle	9	45.0%	1,802	56.4%	46.5%	8	57.1%	50.1%	1,327	72.2%	47.2%	1	16.7%	49.7%	475	35.0%	46.5%
	Upper	6	30.0%	924	28.9%	28.6%	2	14.3%	28.4%	121	6.6%	36.2%	4	66.7%	28.9%	803	59.2%	36.8%
	Unknown	0	0.0%	0	0.0%	0.3%	0	0.0%	0.3%	0	0.0%	0.2%	0	0.0%	0.1%	0	0.0%	0.1%
	<b>Total</b>	<b>20</b>	<b>100%</b>	<b>3,195</b>	<b>100%</b>	<b>100.0%</b>	<b>14</b>	<b>100%</b>	<b>100%</b>	<b>1,839</b>	<b>100%</b>	<b>100%</b>	<b>6</b>	<b>100%</b>	<b>100%</b>	<b>1,356</b>	<b>100%</b>	<b>100%</b>
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	6.2%	0	0.0%	5.8%	0	0.0%	3.1%	0	0.0%	5.2%	0	0.0%	3.2%
	Moderate	2	100.0%	426	100.0%	18.5%	0	0.0%	16.7%	0	0.0%	12.3%	2	100.0%	15.5%	426	100.0%	11.7%
	Middle	0	0.0%	0	0.0%	46.5%	0	0.0%	45.8%	0	0.0%	44.8%	0	0.0%	46.7%	0	0.0%	43.8%
	Upper	0	0.0%	0	0.0%	28.6%	0	0.0%	31.3%	0	0.0%	39.6%	0	0.0%	32.3%	0	0.0%	41.2%
	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%
	<b>Total</b>	<b>2</b>	<b>100%</b>	<b>426</b>	<b>100%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100%</b>	<b>0</b>	<b>0.0%</b>	<b>100%</b>	<b>2</b>	<b>100%</b>	<b>100%</b>	<b>426</b>	<b>100%</b>	<b>100%</b>
MULTI FAMILY	Low	1	20.0%	483	20.0%	12.4%	1	100.0%	20.7%	483	100.0%	6.8%	0	0.0%	27.1%	0	0.0%	10.1%
	Moderate	2	40.0%	787	32.7%	31.3%	0	0.0%	31.0%	0	0.0%	17.7%	2	50.0%	32.9%	787	40.8%	41.6%
	Middle	1	20.0%	440	18.3%	34.4%	0	0.0%	34.5%	0	0.0%	48.1%	1	25.0%	22.9%	440	22.8%	31.3%
	Upper	1	20.0%	700	29.0%	20.6%	0	0.0%	13.8%	0	0.0%	27.4%	1	25.0%	11.4%	700	36.3%	14.6%
	Unknown	0	0.0%	0	0.0%	1.3%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	5.7%	0	0.0%	2.3%
	<b>Total</b>	<b>5</b>	<b>100%</b>	<b>2,410</b>	<b>100%</b>	<b>100.0%</b>	<b>1</b>	<b>100%</b>	<b>100%</b>	<b>483</b>	<b>100%</b>	<b>100%</b>	<b>4</b>	<b>100%</b>	<b>100%</b>	<b>1,927</b>	<b>100%</b>	<b>100%</b>
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	6.2%	0	0.0%	2.8%	0	0.0%	1.4%	0	0.0%	2.0%	0	0.0%	1.1%
	Moderate	0	0.0%	0	0.0%	18.5%	0	0.0%	12.9%	0	0.0%	7.6%	0	0.0%	14.9%	0	0.0%	10.8%
	Middle	0	0.0%	0	0.0%	46.5%	0	0.0%	46.1%	0	0.0%	38.5%	0	0.0%	49.0%	0	0.0%	44.8%
	Upper	0	0.0%	0	0.0%	28.6%	0	0.0%	38.0%	0	0.0%	52.4%	0	0.0%	34.0%	0	0.0%	43.1%
	Unknown	0	0.0%	0	0.0%	0.3%	0	0.0%	0.1%	0	0.0%	0.1%	0	0.0%	0.1%	0	0.0%	0.2%
	<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>100%</b>	<b>0</b>	<b>0.0%</b>	<b>100%</b>	<b>0</b>	<b>0.0%</b>	<b>100%</b>

Originations & Purchases  
Based on 2024 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of HMDA Loans - Table 2 of 2  
Assessment Area: OH Dayton-Kettering-Beavercreek MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2023, 2024					2023					2024						
		Bank				Owner Occupied Units	Count			Dollar			Count		Dollar			
		#	%	\$ (000s)	\$ %		#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	6.2%	0	0.0%	3.8%	0	0.0%	3.0%	0	0.0%	4.3%	0	0.0%	3.0%
	Moderate	0	0.0%	0	0.0%	18.5%	0	0.0%	14.1%	0	0.0%	11.9%	0	0.0%	17.3%	0	0.0%	14.8%
	Middle	0	0.0%	0	0.0%	46.5%	0	0.0%	48.4%	0	0.0%	42.8%	0	0.0%	51.3%	0	0.0%	45.9%
	Upper	1	100.0%	200	100.0%	28.6%	0	0.0%	33.2%	0	0.0%	42.2%	1	100.0%	27.0%	200	100.0%	36.0%
	Unknown	0	0.0%	0	0.0%	0.3%	0	0.0%	0.5%	0	0.0%	0.2%	0	0.0%	0.1%	0	0.0%	0.2%
	<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>200</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>200</b>	<b>100.0%</b>	<b>100.0%</b>
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	6.2%	0	0.0%	7.4%	0	0.0%	3.5%	0	0.0%	7.3%	0	0.0%	6.3%
	Moderate	0	0.0%	0	0.0%	18.5%	0	0.0%	22.1%	0	0.0%	14.2%	0	0.0%	30.9%	0	0.0%	32.9%
	Middle	0	0.0%	0	0.0%	46.5%	0	0.0%	48.5%	0	0.0%	52.9%	0	0.0%	50.9%	0	0.0%	57.5%
	Upper	0	0.0%	0	0.0%	28.6%	0	0.0%	22.1%	0	0.0%	29.4%	0	0.0%	10.9%	0	0.0%	3.2%
	Unknown	0	0.0%	0	0.0%	0.3%	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>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	5	6.7%	822	5.2%	6.2%	4	10.3%	5.5%	744	10.4%	3.5%	1	2.8%	5.7%	78	0.9%	4.1%
	Moderate	17	22.7%	2,554	16.2%	18.5%	7	17.9%	18.7%	598	8.4%	14.2%	10	27.8%	17.8%	1,956	22.6%	15.6%
	Middle	29	38.7%	5,964	37.8%	46.5%	18	46.2%	46.8%	3,518	49.4%	44.7%	11	30.6%	48.2%	2,446	28.2%	44.6%
	Upper	24	32.0%	6,455	40.9%	28.6%	10	25.6%	28.8%	2,265	31.8%	37.6%	14	38.9%	28.1%	4,190	48.3%	35.5%
	Unknown	0	0.0%	0	0.0%	0.3%	0	0.0%	0.2%	0	0.0%	0.1%	0	0.0%	0.2%	0	0.0%	0.3%
	<b>Total</b>	<b>75</b>	<b>100.0%</b>	<b>15,795</b>	<b>100.0%</b>	<b>100.0%</b>	<b>39</b>	<b>100.0%</b>	<b>100.0%</b>	<b>7,125</b>	<b>100.0%</b>	<b>100.0%</b>	<b>36</b>	<b>100.0%</b>	<b>100.0%</b>	<b>8,670</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

### Small Business Lending Tables

#### Geographic Distribution of Small Business Loans

Assessment Area: Nonmetropolitan Ohio

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data				
		2024				
		Count		Dollar		Total Businesses
		#	%	\$(000s)	\$%	%
SMALL BUSINESSES	Low	0	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	0.0%
	Middle	23	46.9%	5,430	54.4%	45.1%
	Upper	26	53.1%	4,557	45.6%	54.9%
	Unknown	0	0.0%	0	0.0%	0.0%
	<i>Total</i>		<i>49</i>	<i>100%</i>	<i>9,988</i>	<i>100%</i>

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data; 2024 D&B information

Percentages may not total 100 percent due to rounding

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

Assessment Area: OH Dayton-Kettering-Beavercreek MSA

		Bank Lending & Demographic Data				
		2024				
		Count		Dollar		Total Businesses
		#	%	\$(000s)	\$%	%
Revenue	\$1Million or Less	14	38.9%	2,335	39.0%	91.0%
	Over \$1Million	21	58.3%	3,594	60.0%	8.2%
	<i>Total Rev. available</i>	<i>35</i>	<i>97.2%</i>	<i>5,929</i>	<i>98.9%</i>	<i>99.3%</i>
	Rev. Not Known	1	2.8%	65	1.1%	0.7%
	<i>Total</i>	<i>36</i>	<i>100%</i>	<i>5,994</i>	<i>100%</i>	<i>100%</i>
Loan Size:	\$100,000 or Less	18	50.0%	1,134	18.9%	
	\$100,001 - \$250,000	10	27.8%	1,670	27.9%	
	\$250,001 - \$1Million	8	22.2%	3,191	53.2%	
	<i>Total</i>	<i>36</i>	<i>100%</i>	<i>5,994</i>	<i>100%</i>	
Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	5	35.7%	242	10.4%	
	\$100,001 - \$250,000	6	42.9%	989	42.4%	
	\$250,001 - \$1Million	3	21.4%	1,104	47.3%	
	<i>Total</i>	<i>14</i>	<i>100%</i>	<i>2,335</i>	<i>100%</i>	

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data; 2024 D&B information

Percentages may not total 100 percent due to rounding

**Geographic Distribution of Small Business Loans**  
Assessment Area: OH Dayton-Kettering-Beavercreek MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data				
		2024				
		Count		Dollar		Total Businesses
		#	%	\$(000s)	\$%	%
SMALL BUSINESSES	Low	1	2.8%	550	9.2%	8.8%
	Moderate	3	8.3%	335	5.6%	20.0%
	Middle	14	38.9%	2,981	49.7%	39.2%
	Upper	18	50.0%	2,129	35.5%	31.3%
	Unknown	0	0.0%	0	0.0%	0.6%
	<i>Total</i>		36	100%	5,994	100%

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data; 2024 D&B information

Percentages may not total 100 percent due to rounding

### Consumer Lending Tables

#### Geographic Distribution of Consumer Loans

Assessment Area: Nonmetropolitan Ohio

Tract Income Levels	Bank Lending & Demographic Data 2024				
	Count		Dollar		Households
	#	%	\$(000s)	\$\$%	%
Low	0	0.0%	0	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	0.0%
Middle	25	37.9%	389	30.5%	49.8%
Upper	41	62.1%	886	69.5%	50.2%
Unknown	0	0.0%	0	0.0%	0.0%
<b>Total</b>	<b>66</b>	<b>100%</b>	<b>1,275</b>	<b>100%</b>	<b>100.0%</b>

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

Percentages may not total 100 percent due to rounding

#### Borrower Distribution of Consumer Loans

Assessment Area: OH Dayton-Kettering-Beavercreek MSA

Household Income Levels	Bank Lending & Demographic Data 2024				
	Count		Dollar		Households by Household
	#	%	\$(000s)	\$\$%	%
Low	1	16.7%	5	5.3%	26.2%
Moderate	1	16.7%	8	8.4%	16.6%
Middle	1	16.7%	13	13.7%	17.3%
Upper	3	50.0%	68	71.6%	39.9%
Unknown	0	0.0%	0	0.0%	0.0%
<b>Total</b>	<b>6</b>	<b>100.0%</b>	<b>95</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

Percentages may not total 100 percent due to rounding

**Geographic Distribution of Consumer Loans**  
Assessment Area: OH Dayton-Kettering-Beavercreek MSA

Tract Income Levels	Bank Lending & Demographic Data				
	2024				
	Count		Dollar		Households
	#	%	\$ (000s)	\$ %	%
Low	0	0.0%	0	0.0%	9.8%
Moderate	0	0.0%	0	0.0%	23.1%
Middle	2	33.3%	46	48.4%	42.8%
Upper	4	66.7%	49	51.6%	23.7%
Unknown	0	0.0%	0	0.0%	0.6%
<i>Total</i>	6	100%	95	100%	100.0%

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

Percentages may not total 100 percent due to rounding

## Appendix D – Glossary of Terms

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

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

**Community development:** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

**Consumer loan(s):** A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity lines of credit, other secured consumer loans, and other unsecured consumer loans.

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

**Full-scope review:** Performance is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar

amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

**Geography:** A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

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

**Household:** Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

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

**Low-income:** Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of 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) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

**Small loan(s) to farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Reports of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

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