

PUBLIC DISCLOSURE

October 7, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The North Side Bank and Trust Company
RSSD #615217

4125 Hamilton Avenue
Cincinnati, Ohio 45223

Federal Reserve Bank of Cleveland

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

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

TABLE OF CONTENTS

Institution’s Community Reinvestment Act (CRA) Rating 2

Scope of Examination 2

Description of Institution 3

Description of Assessment Area 5

Conclusions With Respect to Performance Criteria 13

Fair Lending or Other Illegal Credit Practices Review 25

Appendix A – Map of the Assessment Area 26

Appendix B – Demographic Information 27

Appendix C – HMDA Lending Tables 29

Appendix D – Glossary 33

INSTITUTION'S CRA RATING

North Side Bank and Trust Company (North Side) is rated **Outstanding**.

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Outstanding

This rating is based on the following conclusions with respect to the performance criteria:

- The loan-to-deposit ratio is reasonable given the bank'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 to borrowers reflects a reasonable penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes given the demographics of the AA; and,
- The geographic distribution of loans reflects a reasonable dispersion throughout the AA.
- The bank's community development performance demonstrates an excellent responsiveness to the community development needs of the AA, considering the bank's capacity and the need and availability of such opportunities in the bank's AA.

SCOPE OF EXAMINATION

The Federal Financial Institutions Examination Council's (FFIEC's) Interagency Examination Procedures for Intermediate Small Institutions were utilized to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy and market competition, as well as AA demographic and economic characteristics, and credit needs. Lending performance was assessed within the bank's AA using a full scope review. The following data was reviewed:

- North Side's 18-quarter average net loan-to-deposit ratio.
- Home Mortgage Disclosure Act (HMDA)-reportable (home purchase, refinance, home improvement, other purpose closed end, other purpose lines of credit, and multi-family) loans, small business loans, and consumer (motor vehicle, other secured, other unsecured, and credit cards) loans were analyzed from January 1, 2022, through December 31, 2023.
- Based on the total loan volume by number and dollar amount, HMDA-reportable lending received the most weight, followed by small business and consumer lending, respectively.
- In accordance with CRA examination procedures, the HMDA universe was reviewed,¹ and conclusions were reached in the aggregate. A sample of small business and consumer loans were chosen due to significant volume and as such, an accurate conclusion concerning the bank's lending record could not be reached without their inclusion.

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

- Aggregated 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 North Sides's lending performance in 2022 and 2023.
- Borrower and geographic distribution received equal weight based on a similar percentage of low- and moderate-income (LMI) families and tracts in the AA.
- Lending performance in low-, moderate-, middle-, and upper-income census tracts and to low-, moderate-, middle-, and upper-income borrowers was considered for each product however, comments for activity in middle- and upper-income tracts and to middle- and upper-income borrowers are only included when they impacted the outcome of the analyses.
- Community development activities funded between February 4, 2020, through October 7, 2024, were assessed and qualified investments funded during a prior evaluation period, but still outstanding as of June 30, 2024, were also considered.

DESCRIPTION OF INSTITUTION

North Side is an intrastate community bank headquartered in Cincinnati, Ohio. The bank's characteristics include:

- As of March 31, 2024, North Side has total assets of \$1.0 billion and total deposits of \$823.9 million. This represents a 41.2% increase in total assets and a 47.5% increase in total deposits from September 30, 2019, at the previous CRA evaluation.
- All of North Side's automated teller machines (ATMs) are cash-only. In addition to its main office with an ATM, , the bank has eight branches with ATMs. The main office and seven branches are in Cincinnati (Hamilton County). The remaining branch is in West Chester (Butler County). The main office and two branches are in moderate-income tracts, and three branches are in middle-income tracts in Cincinnati. The West Chester branch and remaining two branches in Cincinnati are in upper-income tracts. Besides the main office that does not offer weekend hours and one branch in an upper-income tract that does not offer drive-thru services; the remaining branches offer weekend hours and drive-thru services. All branches offer extended hours.
- North Side has not opened or closed any branches since the previous evaluation.
- North Side is a full-service retail bank that offers traditional products, including checking and savings accounts, certificates of deposit, commercial, residential real estate, credit card, and consumer loans. North Side offers a website, [nsbt.net](https://www.nsbtc.com), that provides customers with information about the bank's products and services, locations, and contact information. Additionally, North Side offers online and mobile banking to access account information, bill payments, and mobile deposits. North Side also offers wealth management services. During this evaluation period, North Side has experienced an upward trend in mobile banking usage, including mobile check deposits, mobile users, bill pay, and remote deposit capture for businesses.

- During the COVID-19 emergency, North Side offered a forbearance program for mortgage customers, following the Freddie Mac guidance and waived or refunded late charges during the forbearance period for consumer loans customers.

North Side’s loan portfolio composition is shown in the table below.

COMPOSITION OF LOAN PORTFOLIO		
Loan Type	3/31/2024	
	\$ (000s)	Percent
Construction and Development	12,198	1.8%
Secured by One- to Four- Family Dwellings	214,364	31.0%
Other Real Estate: Farmland	0	0.0%
Multifamily	1,679	0.2%
Nonfarm nonresidential	276,621	40.0%
Commercial and Industrial	179,930	26.0%
Loans to Individuals	7,555	1.1%
Agricultural Loans	0	0.0%
Total	\$692,347	100.0%
*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, other loans that do not meet any other category, and contra assets.		

North Side’s investment portfolio as of March 31, 2024, was \$269.1 million, which represents 26.7% of total assets. Since the previous evaluation, total investments increased 61.1%. U.S. Treasury & Agency securities accounted for 71.7%, followed by interest-bearing bank balances, municipal securities, all other securities, and federal funds sold at 13.5%, 11.1%, 2.7%, and 1.0%, respectively of total investments.

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

North Side was rated Satisfactory at its previous CRA performance evaluation (February 3, 2020). The lending test was rated Satisfactory, and the community development test was rated Outstanding.

DESCRIPTION OF ASSESSMENT AREA

North Side has one delineated CRA AA located in the Cincinnati OH-KY-IN Metropolitan Statistical Area (MSA). North Side’s AA is comprised of the entirety of Hamilton County and southern portion of Butler County (excluding Brown, Clermont, and Warren counties in Ohio; Boone, Bracken, Campbell, Gallatin, Grant, Kenton, and Pendleton counties in Kentucky; and Dearborn, Franklin, Ohio, and Union counties in Indiana). See Appendix A for an AA map and Appendix B for additional demographic data.

- The Census Bureau released new size and population data from the 2020 Census on August 12, 2021, as a result, the 2022 demographic information is based on 2020 U.S. Census data. Due to these changes, the AA was comprised of the following tracts for this analysis.

Tract Income Level	2019-2021	2022-2023
	Number of Tracts	Number of Tracts
Low	45	33
Moderate	67	76
Middle	76	79
Upper	78	70
Unknown	3	12
Total	269	270

- The AA lost 12 low- and eight upper-income tracts, and gained nine moderate-, three middle-, and nine unknown-income tracts in 2022.
- According to the June 30, 2024, Federal Deposit Insurance Corporation’s (FDIC) Summary of Deposits Report, North Side ranked ninth amongst 39 financial institutions operating in the AA with a 0.5% deposit market share. U.S. Bank holds the largest share of deposits in the AA at 59.7%, followed by Fifth Third Bank at 26.8%, and PNC Bank at 4.0%. Within the MSA, North Side ranked 14th amongst 57 financial institutions with a 0.5% deposit market share. The three largest market shareholders are the same.
- The 2023 HMDA peer market data shows that North Side ranked 17th among 481 HMDA reporters in the AA having originated 347 loans. The top three HMDA lenders in this market are Fifth Third Bank originating 1,516 loans, The Huntington National Bank originating 1,049 loans, and U.S. Bank originating 948 loans. North Side ranked 14th among 496 HMDA reporters in this market in 2022 and originated 513 loans.

Community Contacts

There were two community contact interviews conducted as part of this evaluation providing supplemental information regarding the area's credit needs and context to demographic and economic conditions of the local community. The first interview was with a representative from a nonprofit organization that provides innovative financing for affordable housing developments and other housing projects in low-income neighborhoods in Cincinnati. The contact stated Cincinnati has been falling behind on the number of affordable housing units since 2018. Increases in construction costs for affordable housing projects are creating significant challenges for developers to generate enough income to support debt obligations. While developers have used tax credits to fill in funding gaps in the past, construction costs are increasing so quickly that by the time the credits are received, the development project is no longer affordable. The contact also indicated attracting investments to revitalize neighborhoods while maintaining affordable housing and the cost of living in those neighborhoods is also an ongoing challenge for economic development in Cincinnati. Another major challenge affecting LMI individuals in Cincinnati is the current wage growth trend that is occurring due to an extremely tight job market. While some niche markets are thriving, wages for the working poor are not increasing, which contributes to an even larger separation of wealth. Lastly, while local banks are involved in the community, the contact stated there are opportunities for financial institutions to support initiatives to increase diversity in the real estate development and banking sectors and address the growing concern of unequal access to capital for LMI individuals and businesses.

The second interview was with a nonprofit community development organization that helps identify priorities and challenges in low-income communities and develops strategies to address these challenges. The contact indicated the most cost-burdened citizens in the city are spending over half their income on housing, leaving very little money for additional expenses. The contact stated the community needs more mixed-income housing; because the lack of mixed-income housing is detrimental to areas experiencing a loss of affordable housing, diversity, and neighborhoods. Specifically, the Over-the-Rhine neighborhood has experienced a sizable loss of affordable housing over the last 20 years due to more market rate housing and higher housing prices. Regarding small business development, the contact indicated there are opportunities for banks to offer more flexible and tailored commercial lending products. The contact believes while traditional financial literacy training is important, it does not directly translate into significant behavioral change. According to the contact, a longer-term approach focusing on behavioral literacy and conscious spending is what will drive real change.

Population Change					
Assessment Area: Cincinnati OH MSA					
Area	2015 Population	2020 Population	Percent Change	2023 Population	Percent Change
Butler County	372,538	390,357	4.8%	393,043	0.7%
Hamilton County	804,194	830,639	3.3%	827,058	-0.4%
Cincinnati, OH-KY-IN MSA	2,162,401	2,256,884	4.4%	2,271,479	0.6%
Ohio	11,575,977	11,799,448	1.9%	11,785,935	-0.1%

Source: 2011-2015 U.S. Census Bureau American Community Survey
2020 U.S. Census Bureau Decennial Census
2023 U.S. Census Bureau Decennial Census

- From 2015 through 2023, Butler and Hamilton counties experienced an increase in population at 5.5% and 2.8%, respectively; however, from 2020 through 2023 Butler County only experienced a 0.7% increase, while Hamilton County experienced a 0.4% decrease in population.
- 77.2% of the AA population was 18 years of age or older, the legal age to enter into a contract.
- 15.2% of the population in the AA was age 65 and over, compared to 16.9% in Ohio.
- While the AA population increased, it is aging resulting in a shrinking working population or lack of labor supply and increasing demand for leisure and healthcare services.
- 37.9% of the AA’s population reside in the AA’s LMI tracts.
- According to 2023 Census data, Cincinnati (Hamilton County) is the largest city in the AA and the third largest city in Ohio with a population of 311,097.² Cincinnati’s population increased by 2.2% since 2020.³ By comparison, West Chester is the largest municipality in Butler County with a population of 66,960. West Chester’s population increased by 0.4% since 2020.⁴

Borrower Income Levels														
Assessment Area: Cincinnati OH-KY-IN MSA														
FFIEC Estimated Median Family Income			Low			Moderate			Middle			Upper		
Year	\$	% Change	0	-	49.9%	50%	-	79.9%	80%	-	119.9%	120%	-	& above
2020	\$80,100		0	-	\$40,049	\$40,050	-	\$64,079	\$64,080	-	\$96,119	\$96,120	-	& above
2021	\$81,900	2.2	0	-	\$40,949	\$40,950	-	\$65,519	\$65,520	-	\$98,279	\$98,280	-	& above
2022	\$97,400	18.9	0	-	\$48,699	\$48,700	-	\$77,919	\$77,920	-	\$116,879	\$116,880	-	& above
2023	\$102,300	5.0	0	-	\$51,149	\$51,150	-	\$81,839	\$81,840	-	\$122,759	\$122,760	-	& above

Source: 2020-2023 FFIEC Census Data

- The median family income (MFI) increased by 27.7% from 2020 to 2023 in the MSA, compared to 21.6% from 2020 to 2022.

² [Ohio Demographics](#)

³ [U.S. Census Bureau QuickFacts - Cincinnati](#)

⁴ [U.S Census Bureau Data – West Chester Township](#)

- Ohio minimum wage for 2023 is \$10.10 per hour or \$21,008 annually.⁵ The Federal minimum wage is \$7.25 per hour and has not increased since 2009.⁶

Poverty Rates			
Assessment Area: Cincinnati OH MSA			
Area	2020	2021	2022
Butler County	10.1%	11.6%	11.7%
Hamilton County	12.7%	15.7%	15.6%
Cincinnati, OH-KY-IN MSA	11.8%	11.8%	11.6%
Ohio	12.6%	13.3%	13.4%
<i>Source: Federal Reserve Economic Data FRED St. Louis Fed</i>			

- While poverty rates in Butler County were consistently lower than poverty rates across Ohio, poverty rates in Hamilton County were consistently higher. Hamilton County poverty rates increased significantly from 2020 to 2021.
- Of the 252,609 families in the AA, 41.8% are designated as LMI with 9.6% living below poverty.
- Of the 424,717 households in the AA, 13.3% are below the poverty level and 2.7% receive public assistance
- Supplemental Nutrition Assistance Program (SNAP)⁷ helps LMI individuals and families, the elderly, and the working poor purchase food and reduce food insecurity and may free up resources for other necessities, such as clothing, housing, and medical expenses. The table below shows the percentage of population by county and state receiving SNAP benefits.

SNAP Recipients		
Assessment Area: Cincinnati OH MSA		
Area	2020	2021
Butler County	10.5%	10.3%
Hamilton County	14.1%	13.4%
Ohio	12.3%	12.7%
<i>Source: Federal Reserve Economic Data FRED St. Louis Fed</i>		

- Hamilton County had the highest poverty rates and percentage of SNAP recipients.
- The percentage of SNAP recipients in Hamilton County was consistently higher than the percentage of SNAP recipients across Ohio.

⁵ [Ohio Minimum Wage](#)

⁶ [Federal Minimum Wage](#)

⁷ [Federal Reserve Economic Data \(FRED\)](#)

Housing Cost Change						
Assessment Area: Cincinnati OH MSA						
Area	Median Housing Value			Median Gross Rent		
	2020	2022	Percent Change	2020	2022	Percent Change
Butler County	\$180,200	\$224,300	24.5%	\$911	\$1,048	15.0%
Hamilton County	\$163,000	\$205,000	25.8%	\$831	\$961	15.6%
Ohio	\$151,400	\$183,300	21.1%	\$825	\$945	14.5%
<i>Source: 2018-2022 U.S. Census Bureau: American Community Survey</i>						
<i>Source: 2016-2020 U.S. Census Bureau: American Community Survey</i>						

- The cost of homes across the AA outpaced MFI (i.e., wage growth) from 2020 to 2022. Home prices rose approximately 25.0%, while MFI rose 21.6% during this period. Rent rose approximately 15.0% during this period of time.
- According to the U.S. Department of Housing and Urban Development’s (HUD) 2022 Fair Market Rents (FMR) data,⁸ the average rent for a two-bedroom unit in the AA was \$968 a month (requiring a minimum annual salary of \$38,720).
- With Ohio’s minimum wage at \$10.10, renters across the state can only afford \$525 in monthly rent. The typical minimum wage worker cannot afford rent for a FMR two-bedroom apartment in this AA.
- According to the National Low Income Housing Coalition and Coalition on Homelessness and Housing in Ohio,⁹ full-time workers must earn at least \$19 an hour (\$39,520 annual salary) in Ohio, which is nearly double the minimum wage to afford an average two-bedroom unit. Rents continue to increase nationwide; currently the national average rent is \$1,486 a month, which requires workers to earn a minimum wage of \$28.58 (\$59,445 annual salary).
- There are 466,214 housing units in the AA, of which 55.0% are owner-occupied, 36.1% are rental and 8.9% are vacant. There are more households in the AA who own their homes than there are renters.
- There are 47,077 (10.1%) total housing units in low-income tracts and 24.1% are owner-occupied, 58.4% are rental, and 17.5% are vacant. There are 138,111 (29.6%) total housing units in moderate-income tracts and 44.3% are owner-occupied, 45.9% are rental, and 9.8% are vacant.
- With 45.0% of total housing units across the AA being either rental or vacant, there may be limited opportunities to originate mortgage loans, particularly in LMI tracts with approximately 60.8% of total housing units being either rental or vacant.
- The presence of the University of Cincinnati and other colleges and universities most likely contributes to the high percentage of rental units in the area. There are at least 47

⁸ [HUD FY 2022 Ohio FMR Summary](#)

⁹ [Ohio Capital Journal](#)

colleges and universities within a 50-mile radius of Cincinnati with a combined student population of 157,631.¹⁰

- The median age of housing stock in the AA is 61 years old, which is the same median age of housing stock in LMI tracts. Across the AA, 29.3% of housing units were built prior to 1950. The age of the housing stock, particularly in LMI tracts demonstrates a potential need for home improvement lending and refinance or home improvement loans to remove lead-based paint that was commonly used on houses and apartments built before 1978.¹¹

Housing Cost Burden						
Assessment Area: Cincinnati OH MSA						
Area	Cost Burden - Owners			Cost Burden - Renters		
	Low Income	Moderate Income	All Owners	Low Income	Moderate Income	All Renters
Butler County	59.0%	26.3%	15.6%	72.1%	16.8%	39.3%
Hamilton County	63.8%	26.3%	17.9%	68.2%	19.9%	40.6%
Assessment Area	62.3%	26.3%	17.1%	69.0%	19.1%	40.3%
Ohio	59.3%	26.1%	16.4%	71.1%	24.7%	38.9%

Cost Burden is housing cost that equals 30 percent or more of household income
Source: U.S. Department of Housing and Urban Development (HUD), 2016-2020 Comprehensive Housing Affordability Strategy

- 62.3% of low-income homeowners and 69.0% of low-income renters are cost burdened, compared to 26.3% of moderate-income homeowners and 19.1% of moderate-income renters.
- 17.1% of all homeowners across the AA are cost burdened, compared to 16.4% of all homeowners in Ohio.
- 40.3% of all renters across the AA are cost burdened, compared to 38.9% of all renters in Ohio.
- The data shows that 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 monies to make a sufficient down payment to purchase a home or otherwise afford increasing rents.
- Cost-burdened households may potentially forgo food, childcare, or medication, and be unable to build emergency, education, or retirement savings.

¹⁰ [CollegeSimply](#)

¹¹ [Ohio Department of Health/Know Our Programs/Childhood Lead Poisoning](#)

Unemployment Rates					
Assessment Area: Cincinnati OH MSA					
Area	2019	2020	2021	2022	2023
Butler County	3.8%	7.3%	4.5%	3.6%	3.2%
Hamilton County	3.8%	7.9%	4.9%	3.6%	3.2%
Cincinnati, OH-KY-IN MSA	3.7%	7.0%	4.4%	3.5%	3.3%
Ohio	4.2%	8.2%	5.1%	4.0%	3.5%
<i>Source: Bureau of Labor Statistics(BLS), Local Area Unemployment Statistics</i>					

- In 2020, unemployment rates increased significantly due to the COVID-19 emergency. Unemployment rates rebounded to pre-COVID levels across the AA starting in 2022 and are better than pre-pandemic lows in 2023. Unemployment rates across the AA were consistently lower than unemployment rates in Ohio during this period.
- According to Ohio Office of Research:¹²
 - Land use in Hamilton County is primarily urban with 58.0% of land available for development. Land use in Butler County is primarily rural with only 34.3% of land available for development.
 - The average weekly wage for the private sector is \$1,398 in Hamilton County and \$1,124 in Butler County, which indicates employed persons could afford median rents in the AA.
 - The leading industries in the AA include health care and social assistance, manufacturing, government, and accommodation and food services.
 - Major employers include but are not limited to:
 - Kroger Co., Proctor & Gamble Co., Cincinnati Children’s Hospital, Fifth Third Bancorp, and American Financial Group, Inc. in Hamilton County
 - Cincinnati Financial Corporation, GE Aerospace, Miami University, Mercy Health, and Cleveland Cliffs in Butler County
- A recent study finds the University of Cincinnati (UC) supports over 125,000 regional jobs and adds \$22.7 billion to Ohio’s economic base. Specifically, UC delivers a significant economic boost to the business community in southwest Ohio, northern Kentucky, and eastern Indiana with \$10.6 billion in added income, which supports 125,057 jobs. This equates to one out of every 12 jobs in the region supported by the activities of the university and its students.¹³
- Amazon is hiring 250,000 full-time, part-time, and seasonal roles across the U.S., including 2,000 in Greater Cincinnati. Amazon also announced its largest wage increase ever for hourly associates with front-line team getting at least an additional \$1.50 per hour starting in October 2024. This increase brings the average base wage to more than \$22.00 per hour.¹⁴

¹²[Ohio County Trends](#)

¹³[UC News](#)

¹⁴[NKY Tribune](#)

- The city council of Cincinnati approved public funding for Findlay Parkside, a \$28.4 million project to renovate 12 buildings in the Over-the-Rhine neighborhood near Findlay Market in April 2023. The project includes 51 residential units, half of which will be available to renters making 80.0% of the area median income (AMI).¹⁵
- The first affordable housing project in downtown Cincinnati in over 30 years opened in March 2024. The Bannister includes 44 income-restricted units for households making 30.0% to 60.0% of the AMI (i.e., \$25,600 to \$51,240 for a family of four). This development project relied on several funding sources, including Low-Income Housing Tax Credits (LIHTC), federal and state historic tax credits, a Local Initiative Support Corporation (LISC) loan, and private fundraising.¹⁶
- Pennrose and Walnut Hills Redevelopment Foundation opened Phase I of Thatcher Flats in October 2024. This is a \$27.0 million redevelopment project that will transform a full city block in Cincinnati's Walnut Hills neighborhood with 86 mixed-income rental units, including 50 affordable housing units (56.0%). In addition to the LIHTCs, the project received funding from the City of Cincinnati and the Cincinnati Development Fund.¹⁷
- In urban Hamilton County, only 7.0% of the populated areas and 3.0% of households do not have access to the minimum bandwidth needed for basic internet activity.¹⁸ In more rural Butler County, 17.0% of the populated areas and 5.0% of households do not have access to the minimum bandwidth.¹⁹ Nationally, those with access to a broadband-enabled computer are employed at a higher rate in urban and rural counties.

¹⁵ [CityBeat](#)

¹⁶ [WVXU](#)

¹⁷ [RE Business Online](#)

¹⁸ [Broadband Ohio – Hamilton County](#)

¹⁹ [Broadband Ohio – Butler County](#)

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

North Side’s performance under the lending test is considered Satisfactory. The net loan-to-deposit ratio is reasonable. The bank made a majority of its loans inside its AA. The borrower distribution is reasonable to individuals of different income levels and to businesses of different revenue sizes. Geographic distribution is considered reasonable. There was a significant level of lending gaps.

Net Loan-to-Deposit Ratio (NLTD)

This performance criterion evaluates the bank’s average NLTD ratio to determine the reasonableness of lending in light of performance context, such as North Side’s capacity to lend, the availability of lending opportunities, and the demographic and economic factors present in the AA since the previous evaluation in comparison to similarly situated FDIC-insured institutions (custom peer group). 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 03/31/2024 \$(000)	NLTD Ratio (%)
		18 – Quarter Average*
North Side Bank and Trust Company	\$1,009,577	81.1
Similarly Situated Institutions	\$(000)	Custom Peer Ratio
Guardian Savings Bank	\$1,182,806	77.0
First State Bank	\$991,700	56.2
Merchants NB	\$1,339,597	87.2
Quarterly LTD Ratio Average Since the Previous Evaluation		73.5
<i>*March 31, 2024, through December 31, 2019</i>		

North Side’s NLTD ratio averaged 81.1%, which exceeded the custom peer group average of 73.5%. Bank management indicated they experienced an increase in deposits in 2020, due to the direct payments to consumers and small businesses from various economic stimulus programs in response to the COVID-19 pandemic, and the volume continues to trend up. Loan growth continues to be favorable post-COVID; however, the recent interest rate environment has caused a slowdown in mortgage lending. This was a similar trend amongst other community banks. Therefore, North Side’s NLTD ratio is reasonable given the bank’s size, financial condition, and AA credit needs.

Assessment Area Concentration

Lending Inside and Outside the Assessment Area

Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Loan Data	82	82	\$1,740	83.7	18	18	\$340	16.3
Total Consumer related	82	82	\$1,740	83.7	18	18	\$340	16.3
Home Improvement	276	82.4	\$24,584	79.1	59	17.6	\$6,510	20.9
Home Purchase - Conventional	137	68.2	\$25,431	70.2	64	31.8	\$10,793	29.8
Multi-Family Housing	1	100	\$650	100	0	0	\$0	0
Other Purpose Closed-End	25	69.4	\$1,319	68.9	11	30.6	\$594	31.1
Other Purpose LOC	302	73.8	\$53,468	77.9	107	26.2	\$15,206	22.1
Refinancing	119	83.2	\$21,630	70.1	24	16.8	\$9,204	29.9
Total HMDA related	860	76.4	\$127,082	75	265	23.6	\$42,307	25
Small Business	88	69.8	\$26,735	79.6	38	30.2	\$6,868	20.4
Total Small Bus. related	88	69.8	\$26,735	79.6	38	30.2	\$6,868	20.4
TOTAL LOANS	1,030	76.2	\$155,557	75.9	321	23.8	\$49,515	24.1

Note: Affiliate loans not included

This performance criterion evaluates the percentage of lending extended inside and outside of the AAs. During the evaluation period, 76.2% by volume and 75.9% by dollar amount of the bank's total loans were made inside the AA. Therefore, a majority of loans by volume and other lending-related activities are in the bank's AA.

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

The bank's lending has a reasonable distribution among individuals of different income levels and businesses of different sizes. Borrower distribution of consumer lending is excellent and reasonable for HMDA and small business lending.

HMDA Lending

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

North Side originated 860 HMDA loans totaling \$127.1 million, and 37 (4.3%) of these loans were made to borrowers with unknown incomes. The bank made 4.5% of loans to borrowers with unknown-income designations, compared to the aggregate of all lenders at 15.6% in 2022. The bank made 4.0% of loans to borrowers with unknown-income designations, compared to the aggregate of all lenders at 16.1% in 2023.

North Side originated 60 (7.0%) HMDA loans to low-income borrowers, which fell significantly below proxy at 24.1%. The bank's performance at 7.2% fell below aggregate lending performance at 13.3% in 2022 and at 6.6% fell below aggregate lending performance at 12.0% in 2023.

North Side originated 108 (12.6%) HMDA loans to moderate-income borrowers, which fell below proxy at 17.7%. The bank’s performance at 12.1% fell below aggregate lending performance at 21.8% in 2022 and at 13.3% fell below aggregate lending performance at 22.2% in 2023.

Borrower distribution of HMDA lending to LMI borrowers is reasonable, considering the high percentage of families that fall below the poverty level.

Small Business Lending

North Side’s performance was compared to the percentage of total small businesses (proxy). North Side originated 88 small business loans totaling \$26.7 million.

Small Business Loans by Business Revenue & Loan Size

Assessment Area: Cincinnati OH MSA

		Bank Lending & Demographic Data				
		2022, 2023				
		Count		Dollar		Total Businesses
		#	%	\$ (000s)	\$ %	%
Revenue	\$1 Million or Less	18	20.5%	4,804	18.0%	89.7%
	Over \$1 Million	70	79.5%	21,931	82.0%	9.4%
	<i>Total Rev. available</i>	88	100.0%	26,735	100.0%	99.1%
	Rev. Not Known	0	0.0%	0	0.0%	0.9%
	<i>Total</i>	<i>88</i>	<i>100%</i>	<i>26,735</i>	<i>100%</i>	<i>100%</i>
Loan Size	\$100,000 or Less	29	33.0%	1,799	6.7%	
	\$100,001 - \$250,000	24	27.3%	4,684	17.5%	
	\$250,001 - \$1 Million	35	39.8%	20,251	75.7%	
	<i>Total</i>	<i>88</i>	<i>100%</i>	<i>26,735</i>	<i>100%</i>	
Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	5	27.8%	235	4.9%	
	\$100,001 - \$250,000	6	33.3%	998	20.8%	
	\$250,001 - \$1 Million	7	38.9%	3,571	74.3%	
	<i>Total</i>	<i>18</i>	<i>100%</i>	<i>4,804</i>	<i>100%</i>	

Originations & Purchases

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

Percentages may not total 100 percent due to rounding

North Side originated 18 (20.5%) loans to businesses with revenues of \$1.0 million or less, which fell significantly below proxy at 89.7%. North Side also made 60.3% of its small dollar loans in amounts of \$250,000 or less. North Side’s willingness to lend in smaller amounts exhibits adequate responsiveness to credit needs of businesses in the AA, since small dollar loans tend to represent amounts typically requested by small businesses. Additionally, a community contact

stated the importance of access to small dollar loans for small businesses. Therefore, the distribution of lending to small businesses is reasonable.

Consumer Lending

Consumer loans are comprised of motor vehicle, other secured, other unsecured loans, and credit cards. North Side’s performance was compared to the percentage of total households by household income (proxy).

North Side originated 82 consumer loans totaling \$1.7 million, and six (7.3%) of these loans were made to borrowers with unknown incomes.

Borrower Distribution of Consumer Loans
Assessment Area: Cincinnati OH MSA

Household Income Levels	Bank Lending & Demographic Data				
	2022, 2023				Households by Household Income %
	Count		Dollar		
#	%	\$ (000s)	\$ %		
Low	29	35.4%	439	25.2%	28.0%
Moderate	17	20.7%	225	12.9%	16.1%
Middle	16	19.5%	248	14.3%	17.2%
Upper	14	17.1%	582	33.4%	38.7%
Unknown	6	7.3%	246	14.1%	0.0%
<i>Total</i>	<i>82</i>	<i>100.0%</i>	<i>1,740</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
Based on 2023 FFIEC Census Data; 2016-2020 ACS data
Percentages may not total 100 percent due to rounding

North Side originated 29 (35.4%) consumer loans to low-income borrowers, which exceeded proxy at 28.0%. North Side originated 17 (20.7%) consumer loans to moderate-income borrowers, which exceeded proxy at 16.1%.

Community contacts stressed the need for more access to affordable credit for lower income individuals. In addition, access to small dollar loans helps LMI individuals build credit and gain access to the mainstream financial system. Therefore, borrower distribution of consumer lending to LMI borrowers is excellent.

Geographic Distribution of Loans

As shown in the table below, there was a significant level of lending gaps.

Lending Penetration								
Tracts	Cincinnati OH MSA - 2022				Cincinnati OH MSA - 2023			
	# Tracts	Tracts w/ no loans	Tracts w/ Loans	Penetration	# Tracts	Tracts w/ no loans	Tracts w/ Loans	Penetration
Low	33	15	18	54.5%	33	22	11	33.3%
Moderate	76	31	45	59.2%	76	32	44	57.9%
Middle	79	16	63	79.7%	79	28	51	64.6%
Upper	70	9	61	87.1%	70	12	58	82.9%
Unknown	12	6	6	50.0%	12	10	2	16.7%
Total	270	77	193	71.5%	270	104	166	61.5%

During the evaluation period, North Side originated loans in 66.5% of its total tracts. In low-income tracts, North Side originated loans in 43.9% of these tracts, which represents a substantial level of lending gaps. In moderate-income tracts, North Side originated loans in 58.6% of these tracts, which represents a significant level of lending gaps. However, there are limited opportunities to originate loans in these tracts, considering the low percentage of families, businesses, and housing units, particularly in low-income tracts. Also, 75.9% of housing units are either rental or vacant and 34.2% of families fall below the poverty level in low-income tracts, and 55.7% of housing units are either rental or vacant and 13.7% of families fall below the poverty level in moderate-income tracts.

Taking these factors into account, the geographic distribution of loans reflects a reasonable dispersion throughout the AA. The geographic distribution of small business lending is excellent and reasonable for HMDA and consumer lending.

HMDA Lending

North Side's performance was compared to the percentage of owner-occupied units (proxy) and aggregate lending performance. North Side originated 860 HMDA loans totaling \$127.1 million.

North Side originated 31 (3.6%) HMDA loans in low-income tracts, which fell slightly below proxy at 4.4%. The bank's performance at 4.1% was comparable to aggregate lending performance at 4.2% in 2022 and at 2.9% fell below aggregate lending performance at 4.9% in 2023.

The bank originated 174 (20.2%) HMDA loans in moderate-income tracts, which fell slightly below proxy at 23.9%. The bank's performance at 18.5% fell below aggregate lending

performance at 26.0% in 2022 and at 22.8% fell slightly below aggregate lending performance at 28.8% in 2023.

The geographic distribution of HMDA lending in LMI tracts is reasonable, considering the limited number of families and high percentage rental and vacant units in these tracts, particularly in low-income tracts.

Small Business Lending

North Side’s performance was compared to the percentage of total businesses by tract income (proxy). North Side originated 88 small business loans totaling \$26.7 million.

Geographic Distribution of Small Business Loans
Assessment Area: Cincinnati OH MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data				
		2022, 2023				
		Count		Dollar		Total Businesses
		#	%	\$ (000s)	\$ %	%
SMALL BUSINESSES	Low	16	18.2%	5,285	19.8%	7.3%
	Moderate	24	27.3%	7,988	29.9%	25.1%
	Middle	26	29.5%	6,487	24.3%	31.3%
	Upper	22	25.0%	6,974	26.1%	34.5%
	Unknown	0	0.0%	0	0.0%	1.8%
	<i>Total</i>		<i>88</i>	<i>100%</i>	<i>26,735</i>	<i>100%</i>

Originations & Purchases
Based on 2023 FFIEC Census Data; 2016-2020 ACS data; 2023 D&B information
Percentages may not total 100 percent due to rounding

North Side originated 16 (18.2%) loans to businesses in low-income tracts, which significantly exceeded proxy at 7.3%. North Side originated 24 (27.3%) loans to businesses in moderate-income tracts, which exceeded proxy at 25.1%.

North Side’s geographic distribution of small business lending in LMI tracts is excellent.

Consumer Lending

North Side’s performance was compared to the percentage of households by tract income (proxy). North Side originated 82 consumer loans totaling \$1.7 million.

Geographic Distribution of Consumer Loans
Assessment Area: Cincinnati OH MSA

Tract Income Levels	Bank Lending & Demographic Data				
	2022, 2023				
	Count		Dollar		Households
	#	%	\$ (000s)	\$ %	%
Low	4	4.9%	38	2.2%	9.1%
Moderate	21	25.6%	282	16.2%	29.3%
Middle	34	41.5%	568	32.6%	30.4%
Upper	23	28.0%	852	49.0%	28.6%
Unknown	0	0.0%	0	0.0%	2.5%
<i>Total</i>	<i>82</i>	<i>100%</i>	<i>1,740</i>	<i>100%</i>	<i>100.0%</i>

Originations & Purchases
Based on 2023 FFIEC Census Data; 2016-2020 ACS data
Percentages may not total 100 percent due to rounding

North Side originated four (4.9%) consumer loans in low-income tracts, which fell below proxy at 9.1%. North Side originated 21 (25.6%) consumer loans in moderate-income tracts, which fell slightly below proxy at 29.3%.

Geographic distribution of consumer lending in LMI tracts is reasonable, considering the limited number of households and high percentage of households below the poverty level in these tracts, particularly low-income tracts.

Response to Complaints

There were no CRA-related complaints filed against the bank since the previous CRA evaluation.

COMMUNITY DEVELOPMENT TEST

North Side’s performance under the community development test is considered Outstanding.

North Side’s community development performance demonstrates an excellent responsiveness to the credit and community development needs of its AA through community development loans, qualified investments, grants, and donations, and community development services, considering North Side’s capacity and the need and availability of such opportunities in the AA. Community development activities represent a significant increase by dollar amount since the previous evaluation. Community development loans primarily supported businesses during the height of the COVID-19 emergency. North Side was able to obtain new qualified investments that supported LMI school districts and increase its levels of small dollar donations and community development services since the previous evaluation. Community contacts stressed the need for supporting all aspects of affordable housing, access to credit for LMI individuals, capital for small

businesses, and financial literacy training. North Side’s community development activities supported these expressed needs. North Side also delivered multiple community development activities to nine organizations that supported services to LMI individuals/families (qualified donations and services) and to one affordable housing organization (qualified investment and services) further demonstrating responsiveness to community development needs and opportunities in its AA.

North Side facilitated 818 PPP loans totaling \$181.1 million through the U.S. government’s Paycheck Protection Program (PPP) between April 10, 2020, through May 17, 2021, to help small businesses impacted by the COVID-19 emergency. Of these loans, 731 (89.8%) loans totaling \$162.4 million (89.7%) were originated within the bank’s AA. Consistent with information provided in the May 27, 2020, joint statement on CRA Consideration for Activities in Response to Coronavirus FAQs;²⁰ PPP loans originated in LMI tracts were considered in the community development test. PPP loans were originated outside of the evaluation period for the retail lending test.

Community Development Loans

North Side originated 267 community development loans totaling approximately \$56.2 million during the evaluation period. The following table reflects the total number of community development loans by purpose, number, and dollar amount.

Purpose of CD Loan	#	\$
Revitalization / Stabilization	266	\$56,153,740
Services to LMI	1	\$50,000
Total	267	\$56,203,740

266 PPP loans totaling \$56.2 million originated in the AA were made in LMI geographies. These loans are considered responsive to credit needs of small businesses and helped to stabilize these communities in the AA during the height of the COVID-19 emergency.

North Side originated a \$50,000 loan to a nonprofit that provides long-term mentoring to LMI youth to help them achieve sustainable livelihoods. The loan provided gap funding that allowed the nonprofit to be able to meet increased demand for its programs, including hiring additional staff.

²⁰ [May 27, 2020 - Frequently Asked Questions \(FAQs\) for Consideration for Activities in Response to the Coronavirus](#)

Community Development Investments

North Side has \$2.6 million in community development investments, grants, and donations.

The following table reflects the total number of qualified investments by purpose, number, and dollar amount:

Purpose of CD Investment	#	\$
Services to LMI	4	\$1,525,000
Affordable Housing	1	1,000,000
Total	5	\$2,525,000
<i>Totals include qualified investments that benefit broader regional area</i>		

North Side’s qualified investments consist of a participation mortgage loan pool that supports affordable housing and municipal school bonds that benefited LMI school districts in the bank’s AA and broader regional area. New investments represent 92.0% of total qualified investments and prior period investments represent 8.0%.

North Side committed \$1.0 million to a participation loan pool that helps Habitat for Humanity of Greater Cincinnati (Habitat) fund below-market-interest-rate mortgages for LMI families whose homes are built or rehabbed by Habitat. During the evaluation period, North Side disbursed \$669,000 which helped Habitat build and/or rehab 47 housing units in the AA and nine housing units in the broader regional area. The unfunded balance is approximately \$330,000.

North Side also obtained a new municipal school bond worth approximately \$500,000 and holds a prior period municipal school bond with a current book value of approximately \$200,000. These qualified investments benefit LMI school districts in the bank’s AA.

Because North Side has been responsive to community development needs and opportunities in its AA, consideration was given to two new municipal school bonds worth \$835,000 that benefit LMI school districts in broader regional area.

Qualified investments also took the form of small dollar donations and grants totaling \$109,684. North Side partners with an array of organizations and nonprofits to fund initiatives aimed at responding to community needs. These donations help provide wraparound services to LMI individuals and families, economic development, and affordable housing activities.

The following table reflects the total number community development small dollar donations by purpose, number, and dollar amount.

Purpose of CD Donation	#	\$
Services to LMI	58	\$41,634
Economic Development	8	\$8,550
Revitalization / Stabilization	7	\$8,500
Affordable Housing	1	\$1,000
Total	74	\$59,684
<i>Totals include donations that benefit broader regional area</i>		
<i>Totals do not include Welcome Home grants</i>		

North Side made 70 donations totaling \$55,184 to 52 different organizations in its AA during the evaluation period. These small dollar donations primarily support nonprofits that provide wraparound services to LMI individuals and families.

Impactful donations include:

- \$8,550 (eight donations) to a business and economic development research center that serves businesses and clients in the public and private sectors.
- \$6,000 (three donations) to a local neighborhood revitalization group in a moderate-income area that promotes affordable housing, affordable housing for seniors, social and medical services for residents, and economic development.
- \$3,000 (two donations) to a behavior health clinic in a moderate-income area that provides services to LMI individuals and families.
- \$3,000 (one donation) to a health foundation serving a low-income area that provides healthcare services to LMI individuals and families.
- \$2,594 (five donations) to three food pantries providing free food to LMI people in need
- \$2,500 (one donation) to a foundation in a moderate-income area that provides scholarships to LMI college students in need.
- \$2,500 (one donation) to a local nonprofit that offers programs and services to LMI individuals and families.
- \$1,000 donation to a nonprofit affordable housing agency.

North Side works with the Federal Home Loan Bank of Cincinnati to offer qualifying LMI homebuyers Welcome Home Fund grants. During the evaluation period, North Side assisted six LMI homebuyers qualify for \$50,000 of assistance to fund either down payments or closing costs for their new homes in the AA.

Because North Side has been responsive to community development needs and opportunities in its AA, consideration was given to four small dollar donations totaling \$4,500 to two organizations in the broader regional area. These donations supported wraparound services to LMI individuals.

Community Development Services

North Side provided 2,863 hours of community development services supporting various service activities during the evaluation period. Total community development service hours equate to 1.4 annualized persons (ANP).²¹

The following table provides a breakdown of qualified community development services by community development purpose. Employees were involved with organizations and activities that promote or facilitate community services targeted to LMI individuals, affordable housing, and to a lesser extent, revitalization / stabilization.

Purpose of CD Service	# Services	# Organizations	# Employees*	# Hours
Services to LMI	101	20	5	1,856
Affordable Housing	33	3	2	567
Revitalization / Stabilization	17	3	3	440
Total	151	26	10	2,863
*May be double counted if employee provided multiple services Totals include CD services that benefit broader regional area				

North Side’s directors, officers, and staff members provided financial expertise to the community by serving on boards and committees (2,672 hours), providing technical assistance (31 hours), and/or conducting financial literacy training (160 hours) in the AA and broader regional area.

Community development services include:

- Two employees provided financial literacy training to students in an LMI school.
- One employee provided financial literacy training in partnership with three nonprofits, consisting of workshops for first-time home ownership and individual sessions covering budgeting, credit scores, loan programs, and how to apply for grants. These sessions were targeted to LMI first-time homebuyers and/or LMI individuals.
- An employee provided technical expertise to three organizations in the form of fundraising and explaining various program eligibility requirements.
- Six employees served on boards/committees of 10 organizations/nonprofits.

Because North Side has been responsive to community development needs and opportunities in its AA, consideration was given to 65 services to seven organizations, by two employees, totaling 947 hours in the broader regional area. Community development services supported services to LMI individuals and affordable housing, primarily by serving on boards and committees.

²¹ Annualized Persons (ANP): Number CD qualified service hours divided by 2,000 work hours in a year

Financial Education –

- **Banzai**
 - Curriculum consists of real-world finance and practical life skills.
 - Curriculum includes lessons for budgeting, saving, managing debt, internet safety, career planning, and other soft skills.
- **StEP – Student Enterprise Program developed by the Economics Center**
 - Curriculum includes lessons for grade school students related to entrepreneurship, critical thinking, and financial responsibility.
 - North Side employees participate in an on-site school store four times per year at different elementary schools. Students have the opportunity to be consumers and producers and buy and sell their customer-made products (i.e., real-world market simulation).

During the COVID-19 emergency, North Side’s employees did not conduct in-person events due to the transition to virtual learning as well as social distancing guidelines that were in place. However, North Side continued to participate in remote StEP online training sessions during the pandemic. Post-pandemic North Side is providing in-person financial literacy training to students, as requested. North Side funds the cost of the course materials.

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

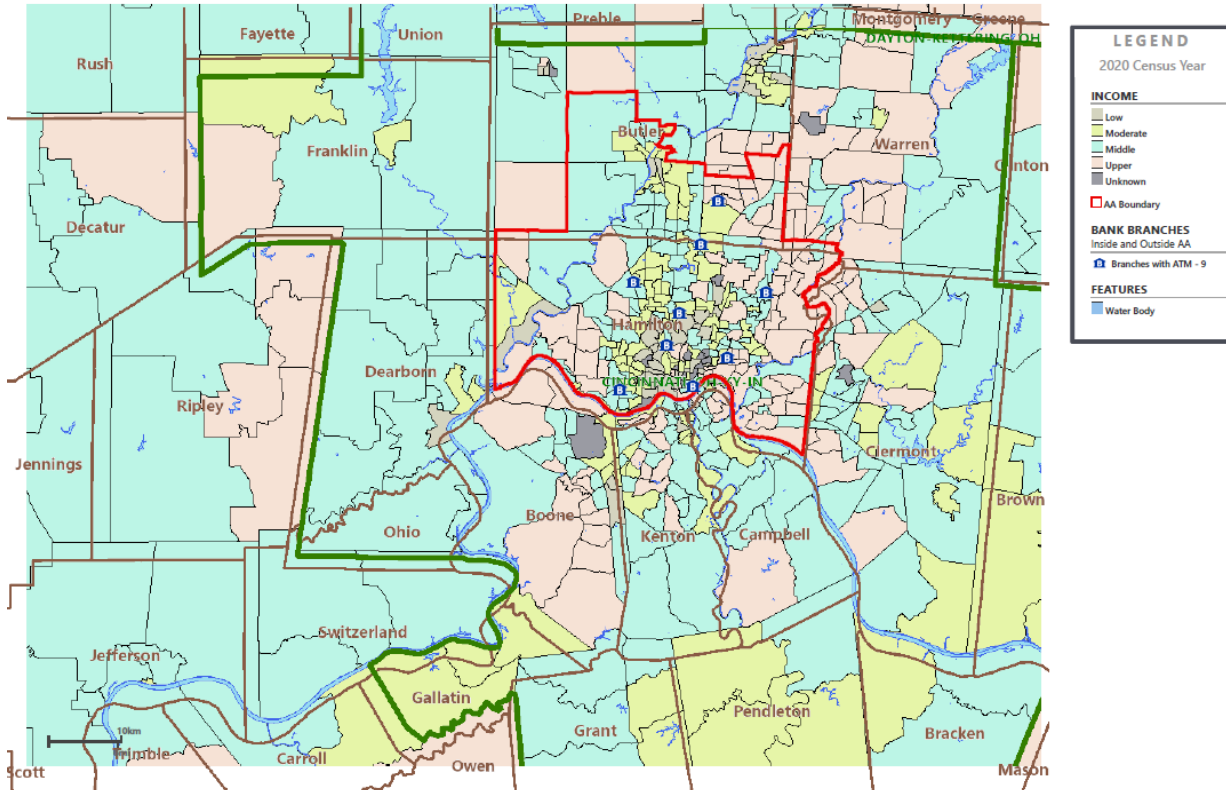
Technical Assistance – North Side’s employees provided technical assistance to community development and nonprofit organizations. Technical assistance included fundraising and explaining various program eligibility requirements.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

APPENDIX A – MAP OF THE ASSESSMENT AREA

Cincinnati OH-KY-IN MSA (Cincinnati OH MSA)



APPENDIX B – DEMOGRAPHIC INFORMATION

Combined Demographics Report

Assessment Area(s): Cincinnati OH MSA 2023

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	33	12.2	18,850	7.5	6,449	34.2	60,841	24.1
Moderate-income	76	28.1	68,152	27.0	9,334	13.7	44,656	17.7
Middle-income	79	29.3	78,790	31.2	4,352	5.5	50,201	19.9
Upper-income	70	25.9	81,928	32.4	2,350	2.9	96,911	38.4
Unknown-income	12	4.4	4,889	1.9	1,813	37.1	0	0.0
Total Assessment Area	270	100.0	252,609	100.0	24,298	9.6	252,609	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	47,077	11,337	4.4	24.1	27,494	58.4	8,246	17.5
Moderate-income	138,111	61,209	23.9	44.3	63,380	45.9	13,522	9.8
Middle-income	138,889	88,385	34.5	63.6	40,927	29.5	9,577	6.9
Upper-income	128,433	92,428	36.1	72.0	28,876	22.5	7,129	5.6
Unknown-income	13,704	2,857	1.1	20.8	7,824	57.1	3,023	22.1
Total Assessment Area	466,214	256,216	100.0	55.0	168,501	36.1	41,497	8.9
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	3,684	7.3	3,176	7.0	488	10.3	20	4.2
Moderate-income	12,627	25.1	11,281	25.0	1,254	26.5	92	19.3
Middle-income	15,736	31.3	14,123	31.3	1,471	31.1	142	29.8
Upper-income	17,331	34.5	15,703	34.8	1,414	29.9	214	44.9
Unknown-income	917	1.8	808	1.8	100	2.1	9	1.9
Total Assessment Area	50,295	100.0	45,091	100.0	4,727	100.0	477	100.0
Percentage of Total Businesses:			89.7		9.4		.9	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	10	3.7	10	3.9	0	0.0	0	0.0
Moderate-income	43	16.0	41	16.0	2	22.2	0	0.0
Middle-income	105	39.2	100	38.9	3	33.3	2	100.0
Upper-income	109	40.7	105	40.9	4	44.4	0	0.0
Unknown-income	1	0.4	1	0.4	0	0.0	0	0.0
Total Assessment Area	268	100.0	257	100.0	9	100.0	2	100.0
Percentage of Total Farms:			95.9		3.4		.7	

2023 FFIEC Census Data and 2023 D&B Information

Combined Demographics Report

Assessment Area(s): Cincinnati OH MSA 2022

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	33	12.2	18,850	7.5	6,449	34.2	60,841	24.1
Moderate-income	76	28.1	68,152	27.0	9,334	13.7	44,656	17.7
Middle-income	79	29.3	78,790	31.2	4,352	5.5	50,201	19.9
Upper-income	70	25.9	81,928	32.4	2,350	2.9	96,911	38.4
Unknown-income	12	4.4	4,889	1.9	1,813	37.1	0	0.0
Total Assessment Area	270	100.0	252,609	100.0	24,298	9.6	252,609	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	47,077	11,337	4.4	24.1	27,494	58.4	8,246	17.5
Moderate-income	138,111	61,209	23.9	44.3	63,380	45.9	13,522	9.8
Middle-income	138,889	88,385	34.5	63.6	40,927	29.5	9,577	6.9
Upper-income	128,433	92,428	36.1	72.0	28,876	22.5	7,129	5.6
Unknown-income	13,704	2,857	1.1	20.8	7,824	57.1	3,023	22.1
Total Assessment Area	466,214	256,216	100.0	55.0	168,501	36.1	41,497	8.9
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	3,618	7.3	3,108	7.0	489	10.3	21	4.2
Moderate-income	12,469	25.2	11,101	25.1	1,272	26.7	96	19.2
Middle-income	15,541	31.4	13,902	31.4	1,492	31.3	147	29.3
Upper-income	16,995	34.3	15,351	34.7	1,417	29.7	227	45.3
Unknown-income	893	1.8	787	1.8	96	2.0	10	2.0
Total Assessment Area	49,516	100.0	44,249	100.0	4,766	100.0	501	100.0
Percentage of Total Businesses:				89.4		9.6		1.0
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	8	3.1	8	3.2	0	0.0	0	0.0
Moderate-income	43	16.4	41	16.4	2	20.0	0	0.0
Middle-income	102	38.9	97	38.8	3	30.0	2	100.0
Upper-income	108	41.2	103	41.2	5	50.0	0	0.0
Unknown-income	1	0.4	1	0.4	0	0.0	0	0.0
Total Assessment Area	262	100.0	250	100.0	10	100.0	2	100.0
Percentage of Total Farms:				95.4		3.8		.8

2022 FFIEC Census Data and 2022 D&B Information

APPENDIX C – HMDA LENDING TABLES

Borrower Distribution of HMDA Loans - Table 1 of 2
Assessment Area: Cincinnati OHMSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022					2023						
		Bank		Dollar		Families by Family Income %	Count		Dollar			Count		Dollar				
		#	%	\$(000s)	\$ %		Bank	Agg	Bank	Agg	\$ %	#	%	%	Bank	Agg	\$ %	
HOME PURCHASE	Low	7	5.1%	546	2.1%	24.1%	3	4.4%	12.2%	131	1.0%	6.8%	4	5.8%	10.8%	415	3.5%	5.7%
	Moderate	13	9.5%	1,320	5.2%	17.7%	7	10.3%	22.6%	749	5.6%	16.8%	6	8.7%	23.4%	571	4.8%	17.0%
	Middle	23	16.8%	2,622	10.3%	19.9%	10	14.7%	18.4%	884	6.6%	17.5%	13	18.8%	19.6%	1,738	14.5%	18.0%
	Upper	84	61.3%	18,815	74.0%	38.4%	43	63.2%	27.7%	10,688	79.3%	41.6%	41	59.4%	27.5%	8,127	68.0%	41.2%
	Unknown	10	7.3%	2,128	8.4%	0.0%	5	7.4%	19.0%	1,030	7.6%	17.3%	5	7.2%	18.7%	1,098	9.2%	18.0%
	<i>Total</i>	<i>137</i>	<i>100%</i>	<i>25,431</i>	<i>100%</i>	<i>100.0%</i>	<i>68</i>	<i>100%</i>	<i>100%</i>	<i>13,482</i>	<i>100%</i>	<i>100%</i>	<i>69</i>	<i>100%</i>	<i>100%</i>	<i>11,949</i>	<i>100%</i>	<i>100%</i>
REFINANCE	Low	14	11.8%	599	2.8%	24.1%	8	11.6%	16.3%	419	3.5%	9.4%	6	12.0%	16.2%	180	1.8%	9.9%
	Moderate	19	16.0%	2,039	9.4%	17.7%	10	14.5%	23.2%	1,201	10.1%	17.4%	9	18.0%	22.4%	838	8.6%	18.1%
	Middle	22	18.5%	3,361	15.5%	19.9%	15	21.7%	21.5%	2,308	19.5%	19.2%	7	14.0%	20.4%	1,053	10.8%	18.9%
	Upper	54	45.4%	13,590	62.8%	38.4%	30	43.5%	27.9%	6,874	58.0%	42.2%	24	48.0%	26.5%	6,716	68.7%	36.2%
	Unknown	10	8.4%	2,041	9.4%	0.0%	6	8.7%	11.1%	1,051	8.9%	11.8%	4	8.0%	14.6%	990	10.1%	17.0%
	<i>Total</i>	<i>119</i>	<i>100%</i>	<i>21,630</i>	<i>100%</i>	<i>100.0%</i>	<i>69</i>	<i>100%</i>	<i>100%</i>	<i>11,853</i>	<i>100%</i>	<i>100%</i>	<i>50</i>	<i>100%</i>	<i>100%</i>	<i>9,777</i>	<i>100%</i>	<i>100%</i>
HOME IMPROVEMENT	Low	24	8.7%	587	2.4%	24.1%	17	10.9%	14.5%	445	2.6%	6.1%	7	5.8%	14.0%	142	1.9%	6.7%
	Moderate	44	15.9%	1,394	5.7%	17.7%	24	15.4%	20.1%	826	4.8%	14.2%	20	16.7%	20.1%	568	7.6%	14.5%
	Middle	60	21.7%	3,956	16.1%	19.9%	23	14.7%	23.2%	2,487	14.5%	20.4%	37	30.8%	24.8%	1,469	19.7%	21.1%
	Upper	145	52.5%	18,357	74.7%	38.4%	91	58.3%	38.5%	13,324	77.8%	52.9%	54	45.0%	35.7%	5,033	67.5%	48.5%
	Unknown	3	1.1%	290	1.2%	0.0%	1	0.6%	3.7%	50	0.3%	6.4%	2	1.7%	5.4%	240	3.2%	9.2%
	<i>Total</i>	<i>276</i>	<i>100%</i>	<i>24,584</i>	<i>100%</i>	<i>100.0%</i>	<i>156</i>	<i>100%</i>	<i>100%</i>	<i>17,132</i>	<i>100%</i>	<i>100%</i>	<i>120</i>	<i>100%</i>	<i>100%</i>	<i>7,452</i>	<i>100%</i>	<i>100%</i>
MULTI FAMILY	Low	0	0.0%	0	0.0%	24.1%	0	0.0%	0.7%	0	0.0%	0.0%	0	0.0%	0.7%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	17.7%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	19.9%	0	0.0%	0.7%	0	0.0%	0.1%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	38.4%	0	0.0%	1.6%	0	0.0%	1.1%	0	0.0%	1.3%	0	0.0%	0.1%
	Unknown	1	100.0%	650	100.0%	0.0%	1	100.0%	97.1%	650	100.0%	98.8%	0	0.0%	98.0%	0	0.0%	99.9%
	<i>Total</i>	<i>1</i>	<i>100%</i>	<i>650</i>	<i>100%</i>	<i>100.0%</i>	<i>1</i>	<i>100%</i>	<i>100%</i>	<i>650</i>	<i>100%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>
OTHER PURPOSE LOC	Low	12	4.0%	1,050	2.0%	24.1%	8	3.8%	10.1%	823	2.2%	4.9%	4	4.3%	10.6%	227	1.5%	6.2%
	Moderate	27	8.9%	2,744	5.1%	17.7%	20	9.6%	18.3%	1,917	5.0%	11.5%	7	7.5%	19.3%	827	5.4%	12.4%
	Middle	43	14.2%	6,497	12.2%	19.9%	26	12.4%	22.2%	3,813	10.0%	18.0%	17	18.3%	24.5%	2,684	17.5%	19.7%
	Upper	208	68.9%	41,012	76.7%	38.4%	145	69.4%	45.6%	29,897	78.3%	61.9%	63	67.7%	42.2%	11,115	72.6%	58.6%
	Unknown	12	4.0%	2,165	4.0%	0.0%	10	4.8%	3.8%	1,715	4.5%	3.7%	2	2.2%	3.4%	450	2.9%	3.1%
	<i>Total</i>	<i>302</i>	<i>100%</i>	<i>53,468</i>	<i>100%</i>	<i>100.0%</i>	<i>209</i>	<i>100%</i>	<i>100%</i>	<i>38,165</i>	<i>100%</i>	<i>100%</i>	<i>93</i>	<i>100%</i>	<i>100%</i>	<i>15,303</i>	<i>100%</i>	<i>100%</i>

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

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

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022					2023						
		Bank		Dollar		Families by Family Income %	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank	Agg	\$ (000s)	\$ %	\$ %	Bank	Agg	\$ (000s)	\$ %	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	3	12.0%	101	7.7%	24.1%	1	10.0%	14.5%	72	17.3%	6.9%	2	13.3%	14.6%	29	3.2%	8.2%
	Moderate	5	20.0%	201	15.2%	17.7%	1	10.0%	20.7%	6	1.4%	12.9%	4	26.7%	22.6%	195	21.6%	15.4%
	Middle	6	24.0%	251	19.0%	19.9%	3	30.0%	23.5%	102	24.6%	14.3%	3	20.0%	26.0%	149	16.5%	16.9%
	Upper	10	40.0%	721	54.7%	38.4%	5	50.0%	37.0%	235	56.6%	61.6%	5	33.3%	32.5%	486	53.8%	55.5%
	Unknown	1	4.0%	45	3.4%	0.0%	0	0.0%	4.3%	0	0.0%	4.3%	1	6.7%	4.4%	45	5.0%	4.1%
	Total	25	100%	1,319	100%	100.0%	10	100%	100%	415	100%	100%	15	100%	100%	904	100%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	24.1%	0	0.0%	1.8%	0	0.0%	1.3%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	17.7%	0	0.0%	0.3%	0	0.0%	0.6%	0	0.0%	0.6%	0	0.0%	0.3%
	Middle	0	0.0%	0	0.0%	19.9%	0	0.0%	0.3%	0	0.0%	0.5%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	38.4%	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%	97.6%	0	0.0%	97.6%	0	0.0%	99.4%	0	0.0%	99.7%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%
HMDA TOTALS	Low	60	7.0%	2,883	2.3%	24.1%	37	7.2%	13.3%	1,890	2.3%	6.4%	23	6.6%	12.0%	993	2.2%	5.6%
	Moderate	108	12.6%	7,698	6.1%	17.7%	62	12.1%	21.8%	4,699	5.8%	14.4%	46	13.3%	22.2%	2,999	6.6%	14.7%
	Middle	154	17.9%	16,687	13.1%	19.9%	77	15.0%	19.7%	9,594	11.7%	15.6%	77	22.2%	20.6%	7,093	15.6%	15.9%
	Upper	501	58.3%	92,495	72.8%	38.4%	314	61.2%	29.6%	61,018	74.7%	37.5%	187	53.9%	29.1%	31,477	69.4%	36.2%
	Unknown	37	4.3%	7,319	5.8%	0.0%	23	4.5%	15.6%	4,496	5.5%	26.0%	14	4.0%	16.1%	2,823	6.2%	27.6%
	Total	860	100%	127,082	100%	100.0%	513	100%	100%	81,697	100%	100%	347	100%	100%	45,385	100%	100%

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

Geographic Distribution of HMDA Loans - Table 1 of 2
Assessment Area: Cincinnati OH MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022					2023						
		Bank				Owner Occupied Units %	Count			Dollar			Count			Dollar		
		Count #	%	Dollar \$ (000s)	\$ %		Bank #	%	Agg %	Bank \$ (000s)	\$ %	Agg \$ %	Bank #	%	Agg %	Bank \$ (000s)	\$ %	Agg \$ %
HOME PURCHASE	Low	5	3.6%	701	2.8%	4.4%	1	1.5%	4.7%	209	1.6%	3.2%	4	5.8%	5.3%	492	4.1%	3.7%
	Moderate	25	18.2%	2,448	9.6%	23.9%	13	19.1%	28.4%	1,117	8.3%	19.6%	12	17.4%	31.5%	1,331	11.1%	23.0%
	Middle	24	17.5%	2,690	10.6%	34.5%	14	20.6%	34.2%	1,383	10.3%	30.8%	10	14.5%	32.4%	1,307	10.9%	29.3%
	Upper	81	59.1%	19,433	76.4%	36.1%	39	57.4%	31.7%	10,704	79.4%	45.4%	42	60.9%	29.7%	8,729	73.1%	42.9%
	Unknown	2	1.5%	159	0.6%	1.1%	1	1.5%	1.1%	69	0.5%	1.1%	1	1.4%	1.0%	90	0.8%	1.1%
	Total	137	100%	25,431	100%	100.0%	68	100%	100%	13,482	100%	100%	69	100%	100%	11,949	100%	100%
REFINANCE	Low	4	3.4%	581	2.7%	4.4%	3	4.3%	3.4%	547	4.6%	2.3%	1	2.0%	4.4%	34	0.3%	3.6%
	Moderate	29	24.4%	2,624	12.1%	23.9%	19	27.5%	24.3%	1,938	16.4%	16.7%	10	20.0%	26.7%	686	7.0%	21.0%
	Middle	37	31.1%	5,172	23.9%	34.5%	20	29.0%	36.3%	3,171	26.8%	31.4%	17	34.0%	35.8%	2,001	20.5%	32.5%
	Upper	46	38.7%	12,698	58.7%	36.1%	24	34.8%	34.9%	5,642	47.6%	48.7%	22	44.0%	31.9%	7,056	72.2%	41.7%
	Unknown	3	2.5%	555	2.6%	1.1%	3	4.3%	1.1%	555	4.7%	0.9%	0	0.0%	1.2%	0	0.0%	1.2%
	Total	119	100%	21,630	100%	100.0%	69	100%	100%	11,833	100%	100%	50	100%	100%	9,777	100%	100%
HOME IMPROVEMENT	Low	13	4.7%	234	1.0%	4.4%	10	6.4%	5.2%	187	1.1%	3.4%	3	2.5%	4.9%	47	0.6%	3.3%
	Moderate	66	23.9%	2,510	10.2%	23.9%	28	17.9%	23.0%	1,462	8.5%	14.4%	38	31.7%	24.5%	1,048	14.1%	15.8%
	Middle	71	25.7%	4,282	17.4%	34.5%	40	25.6%	29.6%	2,620	15.3%	25.1%	31	25.8%	33.4%	1,662	22.3%	29.9%
	Upper	123	44.6%	17,254	70.2%	36.1%	75	48.1%	40.8%	12,559	73.3%	56.0%	48	40.0%	36.5%	4,695	63.0%	50.2%
	Unknown	3	1.1%	304	1.2%	1.1%	3	1.9%	1.4%	304	1.8%	1.0%	0	0.0%	0.8%	0	0.0%	0.8%
	Total	276	100%	24,584	100%	100.0%	156	100%	100%	17,132	100%	100%	120	100%	100%	7,452	100%	100%
MULTI FAMILY	Low	1	100.0%	650	100.0%	15.9%	1	100.0%	13.7%	650	100.0%	10.4%	0	0.0%	15.7%	0	0.0%	19.5%
	Moderate	0	0.0%	0	0.0%	30.7%	0	0.0%	36.3%	0	0.0%	33.8%	0	0.0%	40.5%	0	0.0%	20.6%
	Middle	0	0.0%	0	0.0%	26.9%	0	0.0%	26.1%	0	0.0%	29.8%	0	0.0%	17.6%	0	0.0%	22.7%
	Upper	0	0.0%	0	0.0%	21.2%	0	0.0%	16.3%	0	0.0%	23.0%	0	0.0%	20.9%	0	0.0%	36.1%
	Unknown	0	0.0%	0	0.0%	5.2%	0	0.0%	7.5%	0	0.0%	3.0%	0	0.0%	5.2%	0	0.0%	1.1%
	Total	1	100%	650	100%	100.0%	1	100%	100%	650	100%	100%	0	0.0%	100%	0	0.0%	100%
OTHER PURPOSE LOC	Low	7	2.3%	958	1.8%	4.4%	6	2.9%	1.9%	908	2.4%	1.5%	1	1.1%	2.2%	50	0.3%	1.1%
	Moderate	45	14.9%	4,546	8.5%	23.9%	29	13.9%	15.9%	2,877	7.5%	10.0%	16	17.2%	17.5%	1,669	10.9%	11.4%
	Middle	79	26.2%	10,612	19.8%	34.5%	56	26.8%	34.1%	7,930	20.8%	27.5%	23	24.7%	34.9%	2,682	17.5%	27.0%
	Upper	168	55.6%	36,927	69.1%	36.1%	116	55.5%	47.7%	26,175	68.6%	60.7%	52	55.9%	44.9%	10,752	70.3%	59.8%
	Unknown	3	1.0%	425	0.8%	1.1%	2	1.0%	0.5%	275	0.7%	0.3%	1	1.1%	0.7%	150	1.0%	0.6%
	Total	302	100%	53,468	100%	100.0%	209	100%	100%	38,165	100%	100%	93	100%	100%	15,303	100%	100%

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

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

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022						2023					
		Bank				Owner Occupied Units %	Count			Dollar			Count			Dollar		
		Count #	%	Dollar \$ (000s)	\$ %		Bank #	Agg %	%	Bank \$ (000s)	\$ %	Agg \$ %	Bank #	Agg %	%	Bank \$ (000s)	\$ %	Agg \$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	1	4.0%	45	3.4%	4.4%	0	0.0%	2.0%	0	0.0%	1.2%	1	6.7%	3.4%	45	5.0%	2.4%
	Moderate	9	36.0%	314	23.8%	23.9%	6	60.0%	24.8%	198	47.7%	13.4%	3	20.0%	25.5%	116	12.8%	16.1%
	Middle	7	28.0%	337	25.5%	34.5%	2	20.0%	33.1%	122	29.4%	20.4%	5	33.3%	40.4%	215	23.8%	33.9%
	Upper	8	32.0%	623	47.2%	36.1%	2	20.0%	38.7%	95	22.9%	63.7%	6	40.0%	29.7%	528	58.4%	46.9%
	Unknown	0	0.0%	0	0.0%	1.1%	0	0.0%	1.5%	0	0.0%	1.2%	0	0.0%	1.1%	0	0.0%	0.7%
	Total	25	100%	1,319	100%	100.0%	10	100%	100%	415	100%	100%	15	100%	100%	904	100%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	4.4%	0	0.0%	10.3%	0	0.0%	8.3%	0	0.0%	7.4%	0	0.0%	8.5%
	Moderate	0	0.0%	0	0.0%	23.9%	0	0.0%	40.1%	0	0.0%	31.5%	0	0.0%	48.0%	0	0.0%	46.1%
	Middle	0	0.0%	0	0.0%	34.5%	0	0.0%	31.7%	0	0.0%	34.6%	0	0.0%	30.3%	0	0.0%	27.5%
	Upper	0	0.0%	0	0.0%	36.1%	0	0.0%	16.1%	0	0.0%	23.4%	0	0.0%	10.3%	0	0.0%	12.6%
	Unknown	0	0.0%	0	0.0%	1.1%	0	0.0%	1.8%	0	0.0%	2.3%	0	0.0%	4.0%	0	0.0%	5.3%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%
HMDA TOTALS	Low	31	3.6%	3,169	2.5%	4.4%	21	4.1%	4.2%	2,501	3.1%	3.9%	10	2.9%	4.9%	668	1.5%	5.6%
	Moderate	174	20.2%	12,442	9.8%	23.9%	95	18.5%	26.0%	7,592	9.3%	20.3%	79	22.8%	28.8%	4,850	10.7%	21.8%
	Middle	218	25.3%	23,093	18.2%	34.5%	132	25.7%	34.3%	15,226	18.6%	30.4%	86	24.8%	33.5%	7,867	17.3%	28.9%
	Upper	426	49.5%	86,935	68.4%	36.1%	256	49.9%	34.4%	55,175	67.5%	44.2%	170	49.0%	31.8%	31,760	70.0%	42.6%
	Unknown	11	1.3%	1,443	1.1%	1.1%	9	1.8%	1.1%	1,203	1.5%	1.3%	2	0.6%	1.1%	240	0.5%	1.1%
	Total	860	100%	127,082	100%	100.0%	513	100%	100%	81,697	100%	100%	347	100%	100%	45,385	100%	100%

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

APPENDIX D – GLOSSARY

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

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

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

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

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

Full-scope review: Performance is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

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

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

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

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

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

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

Market share: The number of loans originated and purchased by the institution as a percentage of 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 geography.

Moderate-income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of geography.

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

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

Owner-occupied units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated area: A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area. For these institutions, no state ratings will be received unless the bank also maintains deposit facilities outside of the multistate metropolitan area. CRA activity is captured in either a state rating or a multistate metropolitan area rating, but not both.

Small loan(s) to business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as 'small business loans' if the loans are reported on the TFR as nonmortgage, commercial loans.

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

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