



PUBLIC DISCLOSURE

June 28, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank in New Bremen
Charter Number 14294

435 South Washington Street
New Bremen, OH 45869

Office of the Comptroller of the Currency

Central Ohio - Indiana Field Office
655 Metro Place South, Suite 625
Dublin, OH 43017

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, and should not 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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Overall CRA Rating

Institution's CRA Rating: This institution is rated **Satisfactory**.

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on the state rating and the following overall conclusions.
 - The bank's quarterly average loan-to-deposit (LTD) ratio is reasonable.
 - A substantial majority of the bank's loans are inside the assessment area (AA).
 - The bank exhibits reasonable geographic distribution of loans in the AA.
 - The bank exhibits an excellent distribution of loans to businesses of different sizes in the AA.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's loan-to-deposit ratio is reasonable.

The First National Bank in New Bremen's (FNB or the bank) quarterly average LTD ratio over the 11 quarters since the previous Community Reinvestment Act (CRA) evaluation (June 30, 2018 to December 31, 2020) is 48.2 percent. The ratio ranged from a low of 42.9 percent at December 31, 2020 to a high of 51.1 percent at September 30, 2020. The bank's quarterly average LTD of 48.2 percent is lower than other financial institutions of similar size and location, but is overall reasonable. The other five financial institutions of similar size and location have total assets less than \$1 billion and bank offices in the AA, with an average LTD ratio of 74.2 percent. During the evaluation period, there was strong competition from other financial institutions. Additionally, the bank sold 126 home mortgage loans to the secondary market, totaling \$23.8 million during the evaluation period. Furthermore, FNB's total deposits increased \$56.9 million from March 31, 2020 to December 31, 2020. The LTD ratio in 2020 (both loans and deposits) was artificially impacted by Government stimulus programs in response to COVID-19, including the Small Business Administration (SBA) Paycheck Protection Program (PPP). The bank originated a significant volume of these loans.

Lending in Assessment Area

A substantial majority of the bank's loans are inside its AA.

The bank originated and purchased 91.7 percent of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business	55	91.7	5	8.3	60	6,908	78.0	1,944	22.0	8,852
Total	55	91.7	5	8.3	60	6,908	78.0	1,944	22.0	8,852

Source: 01/01/18 – 12/31/20 Bank Data.
Due to rounding, totals may not equal 100%.

Description of Institution

FNB is an independently owned community bank headquartered in New Bremen, Ohio. The main office in New Bremen is in Auglaize County, which is approximately 90 miles northwest of Columbus, Ohio. In addition, FNB has four full-service branch offices. The branches are all located in Ohio in New Knoxville, Wapakoneta, Botkins, and Sidney. The first two listed are in Auglaize County, Ohio, and the latter two branches are in Shelby County, Ohio. Each office has a drive-up facility and a 24-hour automated teller machine (ATM). The bank's branch locations are accessible to the entire community, and all branches are in middle- and upper-income census tracts (CTs). No branches have been opened or closed since the last CRA evaluation in June 2018. There is no merger or acquisition activity that affects the scope of the bank's operations during the evaluation period.

FNB is a single state financial institution with one AA in the State of Ohio, which is the bank's only rating area. FNB's AA is contiguous and includes all CTs in Auglaize County and Shelby County and two CTs (9678 and 9679) in Mercer County, Ohio (Non-MSA AA). The AA is not part of a Metropolitan Statistical Area (MSA). The bank's AA meets the requirements of the CRA regulation and does not arbitrarily exclude any low- and moderate-income (LMI) areas. The AA is described in the "Scope of the Evaluation" and "Description of Institution's Operations in Ohio" sections in this evaluation.

As of December 31, 2020, FNB had \$369.1 million in total assets, \$33.6 million in tier 1 capital, and net loans of \$142.1 million, or 38.5 percent of total assets. The bank offers a variety of traditional lending and deposit products and services through their full-service banking offices to accommodate their customers, including business, farm, home mortgage, and consumer loans. There are no substantial differences in the business focus or services offered between the bank's branches. Additionally, the bank offers online and mobile banking.

The bank's primary business focus is commercial/commercial real estate lending (business loans). The bank's loan portfolio, as of the December 31, 2020 Consolidated Report of Condition and Income (Call Report), is comprised of business loans of 56 percent, home mortgage loans of 25 percent, farm loans of 18 percent, and consumer loans of 1 percent. The COVID-19 pandemic in 2020 impacted the national and local economy. As a result, the SBA PPP provided loans to help businesses keep their workforces employed during the COVID-19 crisis. The bank was particularly responsive to the SBA's PPP and originated a significant volume of PPP loans, given the bank's size and capacity. FNB originated 158 PPP loans totaling \$28.6 million in 2020.

FNB's previous CRA Performance Evaluation was dated June 4, 2018, and the overall CRA rating was Satisfactory. Presently, there are no financial or legal impediments that affect the bank's ability to help meet the credit needs of its AA.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The Office of the Comptroller of the Currency (OCC) conducted a CRA evaluation to assess the bank's record of meeting the credit needs of its entire community, including LMI areas. The OCC used small bank CRA evaluation procedures to assess the bank's performance under the Lending Test. The OCC

analyzed lending activity in full-year increments during the evaluation period, January 1, 2018 to December 31, 2020.

Based on discussions with management and the number and dollar volume of loan origination data provided by the bank, the bank's primary lending focus is business lending. Based on the number of originated and purchased loans during the evaluation period (2018 – 2020), business loans accounted for 57 percent, home mortgage loans accounted for 9 percent, farm loans accounted for 21 percent, and consumer loans accounted for 13 percent of total loan originations and purchases. Based on the dollar volume of originated and purchased loans during the evaluation period, business loans accounted for 76 percent, home mortgage loans accounted for 8 percent, farm loans accounted for 15 percent, and consumer loans accounted for 1 percent of total loan originations and purchases.

To evaluate the bank's performance, the OCC relied on internal bank reports for the business loans. For the lending analysis, the OCC transaction tested 60 small loans to businesses (20 loans per year of the evaluation period). For analysis purposes, the OCC compared the bank's lending performance with demographic data from the 2015 American Community Survey (ACS) U.S. Census and Dun and Bradstreet (D&B) Data as of June 2020. No affiliate activity was included in this analysis. Refer to the table in Appendix A, Scope of Examination, for more information on the scope of the review.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of the AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

FNB has one AA, the Non-MSA AA. The Non-MSA AA includes Auglaize and Shelby Counties in Ohio and census tracts 9678 and 9679 in Mercer County, Ohio. The bank's AA did not change since the previous CRA evaluation in 2018. The OCC completed a full-scope review of the Non-MSA AA. A community profile for the Non-MSA AA is provided in the "Description of Institution's Operations in Ohio" in the State of Ohio section of this evaluation.

Ratings

The bank's overall rating is based on the State of Ohio rating.

The state rating is based on performance in the bank's only AA, the Non-MSA AA. Refer to the "Scope" section under the state section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this bank has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this bank engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the bank's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

State Rating

State of Ohio

CRA rating for the State of Ohio¹: Satisfactory.

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

- FNB exhibits reasonable geographic distribution of loans in the state.
- The bank's distribution of loans to businesses of different sizes is excellent.

Description of Institution's Operations in Ohio

Non-MSA AA

Demographic Information of the Assessment Area						
Assessment Area: Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	23	0.0	8.7	34.8	56.5	0.0
Population by Geography	103,605	0.0	7.1	31.3	61.6	0.0
Housing Units by Geography	43,883	0.0	8.0	34.3	57.7	0.0
Owner-Occupied Units by Geography	29,276	0.0	4.5	31.1	64.4	0.0
Occupied Rental Units by Geography	10,722	0.0	14.6	39.2	46.2	0.0
Vacant Units by Geography	3,885	0.0	16.1	45.2	38.7	0.0
Businesses by Geography	5,578	0.0	11.1	29.4	59.5	0.0
Farms by Geography	676	0.0	2.1	17.9	80.0	0.0
Family Distribution by Income Level	28,056	13.3	16.6	20.0	50.2	0.0
Household Distribution by Income Level	39,998	16.2	15.2	18.4	50.1	0.0
Median Family Income Non-MSAs - OH		\$55,785	Median Housing Value			\$132,256
			Median Gross Rent			\$670
			Families Below Poverty Level			6.4%

Source: 2015 ACS and 2020 D&B Data.
Due to rounding, totals may not equal 100.0%.
(*) The NA category consists of geographies that have not been assigned an income classification.

FNB has designated one AA in Ohio, the Non-MSA AA. The Non-MSA AA includes Auglaize County, Shelby County, and CTs 9678 and 9679 in Mercer County. The AA is not located in an MSA. The AA

¹ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

is contiguous, meets the requirements of the CRA, and does not arbitrarily exclude LMI geographies. The AA has no designated distressed or underserved tracts. Bank management selected the AA based on its targeted lending territory, the area with the most deposit and lending activity, and office locations. The bank has three offices in Auglaize County, New Bremen, Wapakoneta, and New Knoxville. Wapakoneta is the county seat and largest city in Auglaize County. The bank has two branches in Shelby County, Sidney and Botkins. Sidney is the county seat and largest city in Shelby County.

According to the 2015 ACS U.S. Census data, the population of the AA is 103,605, with 7.1 percent of the population living in moderate-income CTs, 31.3 percent in middle-income CTs, and 61.6 percent in upper-income CTs. The AA includes 28,056 families and 39,998 households. Low-income families represent 13.3 percent and moderate-income families represent 16.6 percent of total families in the AA. The median housing value in the Non-MSA AA was \$132,256. Based on the weighted average of Census MSA Median Family Income in the Non-MSA of \$55,785 in the table above, low-income families make less than \$27,893 (individual income that is less than 50 percent of the area median family income) and moderate-income families make at least \$27,893 but less than \$44,628 (individual income that is at least 50 percent and less than 80 percent of the area median family income). Overall median housing values are approximately 3.0 to 4.7 times the weighted average of Census MSA median family income of the LMI families in the AA. The housing costs relative to income may have a limiting effect on mortgage demand among some LMI families. As of the 2015 ACS U.S. Census, there are 43,883 total housing units in the Non-MSA AA, of which 66.7 percent are owner-occupied, 24.4 percent are rental occupied units, and 8.9 percent are vacant housing units. Approximately 6.4 percent of the families live below the poverty level.

Competition in the AA is strong due to the presence of many regional and community banks. Competitors with significant deposit market share include The Peoples Bank Co., U.S. Bank National Association (N.A.), Minster Bank, First Financial Bank, and JP Morgan Chase Bank, N.A. These five financial institutions account for about 61 percent of the total deposits in Auglaize, Shelby, and Mercer counties. As of the June 30, 2020 Federal Deposit Insurance Corporation's (FDIC's) Deposit Market Share Report, there were 18 financial institutions operating 61 banking offices in Auglaize, Shelby, and Mercer counties, including FNB. The June 30, 2020 FDIC deposit market share data shows FNB's \$310.8 million in total deposits in the AA ranks sixth in overall deposit market share at 8.5 percent.

Business lending (small loans to businesses) is a primary business focus. According to the 2019 Peer Small Business Data, five banks dominate the small business lending market share in the AA, accounting for about 62 percent of the number of small loans originated, with two banks responsible for 40 percent of the number of small business loans made in the AA. FNB is not a CRA loan reporter; therefore, the bank's data is not included in the Peer Small Business Data Report. According to the D&B Data as of June 2020, the AA has 5,578 non-farm businesses. The total number of non-farm businesses with gross revenues of \$1 million or less is 4,366, representing 78.3 percent of all non-farm businesses. Additionally, 65 percent of the businesses have fewer than five employees, 2.7 percent of the businesses are headquartered in the bank's AA, and 86 percent operate from a single location.

The economic conditions in the AA were overall stable during most of the evaluation period. The country's economy suffered from a global pandemic (COVID-19) in 2020 and many people temporarily lost their jobs as a result. Therefore, unemployment rates were higher in 2020 over 2019. The unemployment rates for Auglaize, Shelby, and Mercer Counties (not seasonally adjusted) as of December of each year in the evaluation period and the average annual rates compared favorably to the state rates as they were overall lower than the state unemployment rates.

Average Annual Unemployment Rates			
	2018	2019	2020
Auglaize County	3.3	3.0	6.9
Shelby County	3.8	3.6	7.7
Mercer County	2.7	2.6	5.4
State of Ohio	4.5	4.2	8.1

Source: U.S. Bureau of Labor Statistics.

Unemployment Rates as of December of each year (not seasonally adjusted)			
	2018	2019	2020
Auglaize County	3.4	2.9	3.4
Shelby County	3.8	3.4	4.0
Mercer County	2.9	2.5	2.8
State of Ohio	4.4	3.9	5.3

Source: U.S. Bureau of Labor Statistics.

The AA has a diversified economic base, including manufacturing, trade, services, and government. Primary employers in Auglaize County include Crown Equipment Corporation, Grand Lake Health System, and Nidec-Minster Machine. Primary employers in Shelby County include Honda of America Manufacturing, Inc., Emerson Climate Technologies, and Airstream. Large employers in Mercer County include Crown Equipment Corporation, Cooper Farms Inc., and Mercer Health. Other major employers in the AA include local governments and school systems.

As part of this CRA evaluation, the OCC reviewed information provided from interviews with representatives from affordable housing, economic development, or other non-profit organizations. The contacts identified quality, affordable housing as a need in the community, including affordable rental units. Credit needs also include short-term small dollar loans and loans for home repairs. One contact stated that there is a demand for both residential and commercial properties, including the construction of these properties. Small business lending is a credit need in the community. In general, local financial institutions are adequately meeting the credit and community development needs of the community.

Scope of Evaluation in Ohio

The OCC performed a full-scope review of the Non-MSA AA. The data in the AA was analyzed and presented as one AA for purposes of this evaluation. Business loans are the bank's primary lending product and were evaluated under the Lending Test. The OCC transaction tested 60 business loans (20 loans per year) that were originated or purchased inside the AA for the geographic distribution and borrower income analysis. Refer to the "Scope of the Evaluation" section for more details.

LENDING TEST

The bank's performance under the Lending Test in Ohio is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Non-MSA AA is good.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the State.

Small Loans to Businesses

Refer to Table Q in the State of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The OCC compared the percentage of the number of small loans to businesses originated or purchased by the bank in the four geographic income categories to the distribution of businesses throughout those geographies (demographic data), placing emphasis on the LMI geographies. The OCC also compared the bank's performance against the percentage of small loans to businesses of other lenders (aggregate data), as demonstrated by CRA aggregate data.

FNB exhibits an overall reasonable geographic distribution of small loans to businesses in the Non-MSA AA.

In 2018 – 2020, the percentage of small loans to businesses originated or purchased by the bank in the moderate-income CTs was below the demographic data, but slightly above the CRA aggregate lending data of other lenders, demonstrating overall reasonable performance. There were no low-income CTs in the AA during the evaluation period. All the bank's branches are in middle- and upper-income CTs.

Lending Gap Analysis

Overall, the OCC did not identify any unexplained, conspicuous gaps in the lending distribution. The OCC reviewed internal bank reports to identify potential significant gaps in the distribution of loans during the evaluation period.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans to businesses of different sizes, given the product lines offered by the bank.

Small Loans to Businesses

Refer to Table R in the State of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The OCC compared the percentage distribution of the number of small loans to businesses originated and purchased by the bank (by annual gross revenue level) to businesses with annual gross revenues of \$1 million or less (demographic data). The OCC also compared the bank's performance to aggregate small business data, as demonstrated by CRA aggregate data.

FNB exhibits an excellent distribution of small loans to businesses of different sizes within the AA.

As evidenced in Table R in appendix D for 2018 – 2020, FNB's percentage of small loans to businesses with annual gross revenues of \$1 million or less significantly exceeds CRA aggregate lending data, but is below the percentage of businesses with annual gross revenues of \$1 million or less. In the lending

analysis, the OCC considered performance context factors, including strong competition in the AA. Ten larger financial institutions account for over 77.2 percent of the small business lending market share based on the number of small business loans in the AA. Two of the 10 account for almost 40 percent of the market share, as of the 2019 Peer Small Business Data Report. As of the June 2020 D&B data, only 2.7 percent of the businesses are headquartered in FNB's AA.

Responses to Complaints

The bank has not received any complaints about its CRA performance in helping to meet the AA's credit needs during the evaluation period.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	1/1/18 – 12/31/20	
Bank Products Reviewed:	Small business loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Ohio		
Non-MSA AA	Full-Scope	The Non-MSA AA in Ohio includes Auglaize County, Shelby County, and CTs 9678 and 9679 in Mercer County.

Appendix B: Summary of State Ratings

RATINGS: First National Bank in New Bremen	
Overall Bank:	Lending Test Rating
First National Bank in New Bremen	Satisfactory
State:	
Ohio	Satisfactory

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances. Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

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

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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 non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., 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 conduct 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 applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

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 state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division (MD): As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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.

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.

Rating Area: A rated area is a state or multi-state metropolitan statistical 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 multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical 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.

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

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-,

and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -** Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography -** Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower -** Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

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Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2018-20

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Non-MSA AA	60	7,604	100.0	1,373	0.0	0.0	0.0	11.1	8.3	7.9	29.4	16.7	27.0	59.5	75.0	65.0	0.0	0.0	0.0
Total	60	7,604	100.0	1,373	0.0	0.0	0.0	11.1	8.3	7.9	29.4	16.7	27.0	59.5	75.0	65.0	0.0	0.0	0.0

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0%.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2018-20

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Non-MSA AA	60	7,604	100.0	1,373	78.3	65.0	44.5	7.4	31.7	14.3	3.3
Total	60	7,604	100.0	1,373	78.3	65.0	44.5	7.4	31.7	14.3	3.3

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0%.