



PUBLIC DISCLOSURE

May 30, 2023

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

INB, National Association
Charter Number 11443

322 East Capitol Street
Springfield, Illinois 62701

Office of the Comptroller of the Currency

211 Fulton Street
Suite 604
Peoria, Illinois 61602

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 Community Development Test is rated: Outstanding

The major factors that support this rating include:

- The Lending Test rating is based on the Satisfactory performance in the State of Illinois
- The Community Development (CD) Test rating is based on the Outstanding performance in the State of Illinois. The bank's response to the COVID-19 pandemic with responsive flexible lending had a positive impact on the bank's CD performance.
- The loan-to-deposit (LTD) ratio is reasonable.
- A majority of INB's loans are originated or purchased inside its assessment areas (AAs).

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio is reasonable.

The quarterly average LTD ratio was 72.4 percent for the 11-quarter period between June 30, 2020, and December 31, 2022. Over the same period, the bank had a low LTD ratio of 63.5 percent and a high of 94.6 percent.

We compared INB's quarterly average LTD ratio to nine other similarly situated FDIC insured financial institutions that compete with the bank for deposits in the AA. The comparable institutions ranged in size from \$441.7 million to \$5.0 billion and reported quarterly average LTD ratios from 61.4 percent to 93.7 percent.

Lending in Assessment Area

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

The bank originated and purchased 86.6 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

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		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	3,784	86.7	581	13.3	4,365	711,722	73.1	261,917	26.9	973,640
Small Business	19	79.2	5	20.8	24	2,476	28.5	6,218	71.5	8,694
Total	3,803	86.6	586	13.4	4,389	714,198	72.7	268,135	27.3	982,333

Source: HMDA data and sample of business loans originated or purchased from January 1, 2020, to December 31, 2021.

Description of Institution

INB, National Association (INB or Bank) is an intrastate bank headquartered in Springfield, Illinois, with total assets of \$1.8 billion at December 31, 2022. The bank has a subsidiary, INB Park, LLC (INB Park), which holds the title to the bank parking deck in Springfield, Illinois. INB is wholly owned by Illinois National Bancorp, Inc. (INBI), a one bank holding company with \$1.8 billion in assets at December 31, 2022. Neither INBI or INB Park negatively affects the bank's ability to meet the credit needs of the community.

INB's mission is to partner with people and technology to provide diversified financial services within the community. Their vision is to help their customers minimize financial pressures and live better lives.

The CRA evaluation has one rating area for INB's six legal AAs in central and east-central Illinois. They include the Springfield, Illinois MSA (Springfield MSA), portions of the Peoria, Illinois MSA (Peoria MSA), the Bloomington, Illinois MSA (Bloomington MSA), the Champaign-Urbana, Illinois MSA (Champaign MSA), the Danville, Illinois MSA (Danville MSA), and one county comprising the Illinois Non-MSA (IL Non-MSA).

The bank sources a majority of its deposits, or 88.1 percent, from the Springfield MSA, as of June 30, 2022. The Peoria MSA is the second largest source of deposits at 7.3 percent. The remaining AAs; Danville MSA, Champaign MSA, Bloomington MSA, and IL Non-MSA comprise the remaining 4.6 percent of bank deposits.

INB offers residential and business loan products in addition to agricultural and consumer loan products to its customers. The bank did not open or close any branch locations over the evaluation period. INB serves the rating area with 13 branch locations. Branch locations offer drive-thru services and an onsite ATM, except the Danville MSA, Champaign MSA, and the Pleasant Plains location in the Springfield MSA. The Danville MSA offers neither drive-thru or on-site ATM services; however, customers have access to a non-INB ATM at a local Casey's at no charge. The Pleasant Plains location in the Springfield MSA does not offer on-site ATM services, but there is a nearby INB ATM located in town. The Champaign MSA does not have drive-thru services. Eight of the 13 branches offer Saturday service, either through the lobby or the drive-thru. Customers have additional banking access through telephone, Internet, and mobile platforms.

Commercial loans represent the largest portfolio at \$1.3 billion, followed by residential at \$170.6 million, agricultural at \$34.5 million, and consumer at \$10.3 million, per call report data at December 31, 2022. INB originated or purchased over 5,500 loans totaling \$1.6 billion from January 1, 2020, through December 31, 2021, per bank data. INB also originates and sells home mortgage loans into the secondary market.

INB reported a net loans and leases to total asset ratio of 82.8 percent and a tier 1 leverage capital ratio of 10.45 percent, or \$185.4 million at December 31, 2022. There are no legal or financial circumstances that impede the bank's ability to meet the credit needs of its AAs.

The previous CRA rating, which the OCC determined using the Intermediate Small Bank evaluation procedures, was Satisfactory, as detailed in the Performance Evaluation dated May 4, 2020.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period covers the period from the date of the previous CRA Performance Evaluation of May 4, 2020, through May 30, 2023. We evaluated INB under the Intermediate Small Bank evaluation procedures, which includes a Lending Test and a Community Development Test. Lending performance for home mortgage lending is based on the full population of originated or purchased HMDA reportable loans and received a greater weighting in our analysis. Lending performance for business loans is based on a sample of loans originated or purchased, not the full population of data, and is considered in context.

The Lending Test evaluated loans originated or purchased between January 1, 2020, and December 31, 2021, and were compared to the 2015 American Community Survey Census Data.

The Community Development Test evaluated eligible community development investments, loans, and services between January 1, 2020, and December 31, 2021.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas 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.

Ratings

The bank’s overall rating is based on the State of Illinois rating.

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 institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution'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 Illinois

CRA rating for the State of Illinois¹: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- The borrower distribution of loans reflects reasonable performance.
- The geographic distribution of loans reflects reasonable performance.
- The CD activities reflect excellent responsiveness, particularly from CD lending activities. The bank's response to the COVID-19 pandemic with responsive flexible lending had a positive impact on the bank's CD performance.

Description of Institution's Operations in Illinois

INB serves its customers with 13 branches and 15 publicly available ATMs as of December 31, 2022. Each AA contains at least one branch location, except for the Springfield MSA, which contains eight branches. Branch locations offer drive-thru services and an onsite ATM, except the Danville MSA, the Pleasant Plains location in the Springfield MSA, and Champaign MSA. The Danville MSA offers neither drive-thru or on-site ATM services; however, customers have access to a non-INB ATM at a local Casey's at no charge. The Pleasant Plains location in the Springfield MSA does not offer on-site ATM services, but there is a nearby INB ATM located in town. The Champaign MSA does not have drive-thru services. Eight of the 13 branches offer Saturday service, either through the lobby or the drive-thru. Customers have additional banking access through telephone, Internet, and mobile platforms. One branch and one publicly available ATM are located in moderate-income census tracts (CT) in the Springfield MSA.

In the Danville MSA and IL Non-MSA, there are no full-time on-site mortgage loan officers (MLO) due to low demand for home mortgage applications. Applications for home mortgages from these limited-scope AAs are received by MLOs in neighboring AAs.

The local economy of Springfield is concentrated in state government and healthcare as the top three leading employers are the State of Illinois, Memorial Health System, and St. John's Hospital. The economies of the limited-scope AAs include education, healthcare, manufacturing, and finance/insurance.

Unemployment rates were high in 2020 due to the COVID-19 pandemic and then subsequently declined. According to the U.S. Bureau of Labor Statistics, the annual unemployment rate in the State of Illinois was 9.3 percent in 2020, which then declined to 6.1 percent in 2021. The annual unemployment rate in the Springfield MSA for 2021 was 5.6 percent and was comparable to the State of Illinois. The Bloomington MSA (4.7 percent), IL Non-MSA (4.9 percent) and Champaign MSA (4.9 percent) were

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

favorable to the State of Illinois for 2021, while the Danville MSA (6.7 percent) and Peoria MSA (6.1 percent) were unfavorable to the State of Illinois.

Competition for deposits is high among financial institutions. INB held the highest deposit market share position at 16.0 percent in the Springfield MSA among 26 FDIC insured financial institutions competing for the areas \$9.0 billion in deposits, at June 30, 2022. In the limited-scope AAs, INB held less than 1.0 percent of deposit market share in the Bloomington MSA and Champaign MSA, 4.8 percent in the IL Non-MSA, 1.3 percent in the Peoria MSA, and 1.3 percent in the Danville MSA.

The Springfield AA includes 11 low-income CTs and 10 moderate-income CTs, as of 2021. Housing costs are generally affordable for low- and moderate-income families when considering the median housing value but may present challenges for low-income families when also considering property tax rates in Illinois. Additionally, deteriorating housing quality in low- and moderate-income (LMI) areas, noted by community contacts, may limit opportunities for some borrowers due to cost for improvements.

We relied on information from three community contact interviews to understand area needs and opportunities for the Springfield MSA, which received a full-scope review. The contacts represented organizations focused on economic development and social services. The contacts noted the economic condition as stable. The low- to moderate-income (LMI) areas are located in and around downtown Springfield and east to southeast along Interstate 55. There is little housing in downtown Springfield. The LMI areas present a challenge for lending due to continued deteriorating housing quality and relocation of jobs out of the area. Affordable housing remains a primary need but there are challenges given the increase in housing costs and utility costs. Small business support and financial education continue to be needs in the community. Additional needs were noted with home energy efficiency, financial assistance for education and utilities, and technical assistance to community groups through board member and committee participation. Community development opportunities are limited for the number of financial institutions competing in the area. Much of the affordable housing projects are controlled by the State of Illinois, and there are no community development financial institutions in the Springfield area. The contacts had no negative perceptions of INB.

Springfield MSA

Assessment Area: Springfield MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	56	19.6	17.9	42.9	19.6	0.0
Population by Geography	211,627	14.9	13.7	44.4	27.0	0.0
Housing Units by Geography	96,084	15.3	15.9	43.5	25.2	0.0
Owner-Occupied Units by Geography	61,653	9.2	12.4	45.9	32.4	0.0
Occupied Rental Units by Geography	26,376	27.3	20.8	39.6	12.3	0.0
Vacant Units by Geography	8,055	22.7	26.9	38.0	12.4	0.0
Businesses by Geography	15,643	15.6	16.0	38.7	29.7	0.0
Farms by Geography	768	5.6	7.0	54.3	33.1	0.0
Family Distribution by Income Level	54,423	22.5	16.2	20.7	40.6	0.0

Household Distribution by Income Level	88,029	25.2	15.6	17.2	41.9	0.0
Median Family Income MSA - 44100 Springfield, IL MSA		\$73,402	Median Housing Value			\$126,604
			Median Gross Rent			\$732
			Families Below Poverty Level			10.6%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Illinois

The Springfield MSA received a full-scope review while the Peoria MSA, Bloomington MSA, Champaign MSA, Danville MSA, and IL Non-MSA received limited-scope reviews. The Springfield MSA received a greater weighting as it accounts for a significant portion of the bank's deposit activity. Please refer to Appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on full- and limited-scope reviews, the bank's lending performance in the State of Illinois is reasonable.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table O in the State of Illinois section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans was reasonable.

The proportion of lending in low-income geographies was substantially less than the percentage of owner-occupied housing units but near to the aggregate distribution of all reporting lenders. The proportion of lending in moderate-income geographies was near to both the percentage of owner-occupied housing units and the aggregate distribution of all reporting lenders.

Small Loans to Businesses

Refer to Table Q in the State of Illinois 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 distribution of business loans was reasonable.

The proportion of lending in low-income geographies was less than the percentage of businesses in low-income geographies but near to the aggregate distribution of all reporting lenders. The proportion of lending in moderate-income geographies met the percentage of businesses in moderate-income geographies and exceeded the aggregate distribution of all reporting lenders.

Lending Gap Analysis

The OCC analyzed the bank's geographic lending patterns of home mortgage loans by mapping loan originations and purchases throughout the AA. We did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to Table P in the State of Illinois section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was reasonable.

The proportion of lending to low-income families was substantially less than the percentage of low-income families in the AA but near to the aggregate distribution of all reporting lenders. The proportion of lending to moderate-income families exceeded the percentage of moderate-income families in the AA and was near to the aggregate distribution of all reporting lenders.

Small Loans to Businesses

Refer to Table R in the State of Illinois 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 distribution of business loans among businesses of different sizes was reasonable.

The proportion of lending to small businesses was substantially less than the percentage of small businesses in the AA and less than the aggregate distribution of all reporting lenders. For 57.9 percent of bank loans, revenue information was not available as these represented SBA Paycheck Protection Program (PPP) loans. Performance under this criterion is reasonable.

Responses to Complaints

INB did not receive any complaints about its performance in helping to meet the credit needs of its AAs during the evaluation period.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Peoria MSA, Champaign MSA, Danville MSA, and IL Non-MSA is consistent with the bank's overall performance under the Lending Test in the full-scope area. Based on a limited-scope review, the bank's performance under the Lending Test in the Bloomington MSA is weaker than the bank's overall performance under the Lending Test in the full-scope area. The bank's performance is weaker in the Bloomington MSA due to a weaker borrower distribution. Performance differences in the limited-scope areas did not impact the overall Lending Test conclusion for the State of Illinois.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the State of Illinois is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on full-scope and limited-scope reviews, the bank exhibits excellent responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AAs.

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Springfield MSA	8	80.0	19,859	86.4
Peoria MSA	1	10.0	2,000	8.7
Bloomington MSA	1	10.0	1,134	4.9
Champaign MSA	0	0.0	0	0.0
Non-MSA	0	0.0	0	0.0

Source: Bank submitted activity from January 1, 2020, to December 31, 2021. Due to rounding, totals may not equal 100.0 percent.

In the Springfield MSA, INB made eight CD loans totaling \$19.9 million, which represented 12.2 percent of tier 1 capital allocated to the AA. Of the eight CD loans, five were PPP loans totaling \$13.4 million, that supported area businesses during the COVID-19 pandemic. By dollar volume, 32.7 percent supported community services, and 67.3 percent funded economic development activities.

Examples of CD loans in the Springfield MSA:

- One loan totaling \$6.0 million to support an organization that provides services to persons with developmental disabilities who are primarily LMI persons or children of LMI parents.
- Two loans totaling \$503 thousand to support an organization that provides affordable housing, workforce development, and life skills for persons with developmental disabilities, who are primarily LMI persons.
- One PPP loan totaling \$137 thousand to a foodbank during the COVID-19 pandemic.

INB made use of responsive flexible lending during the COVID-19 pandemic by originating loans to stabilize small businesses and communities through the SBA PPP. The bank originated 747 PPP loans totaling \$87.9 million across the bank, excluding any counted as a CD loan, representing 47.4 percent of tier 1 capital. This activity received positive consideration as it provided stabilization of small businesses and communities.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Springfield MSA	0	0	141	230	141	84.9	230	93.5	0	0
Peoria MSA	0	0	4	1	4	2.4	1	0.4	0	0
Bloomington MSA	0	0	11	6	11	6.6	6	2.4	0	0
Champaign MSA	0	0	10	9	10	6.0	9	3.7	0	0
Non-MSA	0	0	0	0	0	0.0	0	0.0	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

In the Springfield MSA, INB made 141 investments consisting of grants and donations totaling \$230 thousand. The dollar volume of qualifying investments represents 0.1 percent of tier 1 capital allocated to the AA. By dollar volume, 2.3 percent funded affordable housing 62.9 percent funded community services to LMI individuals, and 34.8 percent funded economic development.

Examples of CD investments in the Springfield MSA:

- A total of \$22,999 donated to an organization that provides financial literacy courses to schools, including schools in LMI communities.
- A total of \$11,500 donated to an organization that provides services to persons with developmental disabilities who are primarily LMI persons or children of LMI parents.
- A total of \$6,000 donated to an organization that provides services, such as after-school programs and mentoring, to children from low-income and underprivileged families.

Extent to Which the Bank Provides Community Development Services

In the Springfield MSA, INB provided 17 service activities, of which 15 were in leadership roles. Hours were not provided for consideration. Two activities supported affordable housing, 11 supported community services, and four supported economic development. In the statewide area, an employee served on a committee for a non-profit organization that builds and provides housing for LMI persons.

Examples of CD services in the Springfield MSA:

- A bank officer served as a chair member of an organization that provides services to persons with developmental disabilities who are primarily LMI persons or children of LMI parents.
- A bank officer served as a board member of an organization that provides affordable housing, workforce development, and life skills for persons with developmental disabilities, who are primarily LMI persons.
- A bank lender served on a committee for an organization that builds affordable housing for LMI persons.

In the Springfield MSA, INB maintains one branch and one ATM in a moderate-income geography. The bank also provides banking access via online and mobile platforms.

INB participates in lending programs to help meet the credit needs of LMI homebuyers and small businesses.

- INB participates in a downpayment assistance program with the FHLB Chicago where LMI borrowers can receive up to \$6,000 in grants forgiven within five years of home ownership. Under the program, 134 loans were originated where borrowers benefited from \$792 thousand in downpayment assistance grants during the CD evaluation period.
- INB participates in lending programs with the SBA. Under the program, INB originated five SBA program loans totaling \$3.4 million.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the CD Test in the Peoria MSA and Bloomington MSA is consistent with the bank's overall performance under the CD Test in the full-scope area. Based on limited-scope reviews, the bank's performance under the CD Test in the Champaign MSA, Danville MSA, and IL Non-MSA is weaker than the bank's overall performance under the CD Test in the full-scope area. The bank's performance in the Champaign MSA, Danville MSA, and IL Non-MSA is weaker due lower levels of CD lending. Performance differences in the limited-scope areas did not impact the overall CD Test conclusion for the State of Illinois.

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 MSA(s) and non-MSA(s) 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:	January 1, 2020 – December 31, 2021	
Bank Products Reviewed:	Home mortgage and small business	
Affiliate(s)	Affiliate Relationship	Products Reviewed
NA	NA	NA
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State: Illinois		
Springfield MSA	Full-Scope	Sangamon and Menard Counties
Peoria MSA	Limited-Scope	Peoria, Tazewell, and Woodford Counties
Bloomington MSA	Limited-Scope	McLean County
Champaign-Urbana MSA	Limited-Scope	Champaign and Piatt Counties
Danville MSA	Limited-Scope	Vermillion County
Non-MSA	Limited-Scope	Logan County

Appendix B: Summary of State Ratings

Ratings - INB, National Association			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
INB, National Association	Satisfactory	Outstanding	Satisfactory
State:			
Illinois	Satisfactory	Outstanding	Satisfactory

(*) The Lending Test and Community Development Test carry equal weight in the overall rating.

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: 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: 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.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-21	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Springfield MSA	1,771	335,451	46.8	8,398	9.2	4.5	5.1	12.4	10.6	12.3	45.9	40.5	47.6	32.4	44.4	35.0	0.0	0.0	0.0	
Peoria MSA	1,073	178,463	28.4	14,832	3.8	1.2	1.4	13.4	8.9	11.8	50.3	42.0	49.5	32.6	47.9	37.3	0.0	0.0	0.0	
Bloomington MSA	252	64,539	6.7	8,249	2.3	2.8	2.7	14.3	7.1	11.9	53.9	37.3	49.8	29.5	52.8	35.6	0.0	0.0	0.0	
Champaign MSA	553	117,002	14.6	7,743	4.9	3.8	3.6	10.8	7.4	9.4	58.1	64.6	58.2	26.1	24.2	28.6	0.1	0.0	0.2	
Danville MSA	33	3,575	0.9	1,659	2.8	0.0	1.1	11.4	3.0	4.1	49.6	36.4	49.4	36.2	60.6	45.3	0.0	0.0	0.0	
Non-MSA	102	12,693	2.7	794	0.0	0.0	0.0	0.0	0.0	0.0	90.6	90.2	90.4	9.4	9.8	9.6	0.0	0.0	0.0	
Total	3,784	711,722	100.0	41,675	4.7	3.2	2.8	12.4	9.0	10.9	52.2	45.6	51.6	30.7	42.2	34.7	0.0	0.0	0.0	

Source: 2015 ACS; 01/01/2020 - 12/13/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

INB National Association (10000011443) excluded from Aggregate

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Springfield MSA	1,771	335,451	46.8	8,398	22.5	9.7	11.7	16.2	19.0	20.4	20.7	22.0	19.5	40.6	37.3	29.4	0.0	12.0	19.0
Peoria MSA	1,073	178,463	28.4	14,832	20.6	7.3	11.3	17.8	17.2	18.4	21.2	22.8	19.5	40.4	48.4	29.2	0.0	4.3	21.6
Bloomington MSA	252	64,539	6.7	8,249	19.4	7.9	12.5	17.3	9.1	17.9	22.2	34.9	21.7	41.1	35.3	28.8	0.0	12.7	19.1
Champaign MSA	553	117,002	14.6	7,743	21.8	8.1	9.2	16.5	17.0	19.6	20.7	20.3	20.9	41.0	43.4	33.9	0.0	11.2	16.3
Danville MSA	33	3,575	0.9	1,659	21.7	6.1	5.8	16.8	12.1	19.0	20.7	18.2	23.7	40.8	51.5	33.3	0.0	12.1	18.1
Non-MSA	102	12,693	2.7	794	19.4	10.8	8.7	15.0	34.3	19.0	20.8	22.5	23.8	44.7	30.4	26.8	0.0	2.0	21.7
Total	3,784	711,722	100.0	41,675	21.1	8.6	11.0	17.0	17.9	19.0	21.1	22.8	20.4	40.8	41.1	30.2	0.0	9.5	19.5
<i>Source: 2015 ACS; 01/01/2020 - 12/13/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>																			
<i>INB National Association (10000011443) excluded from Aggregate</i>																			

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-21	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Springfield MSA	38	8,131	27.3	3,072	15.6	10.5	13.0	16.0	15.8	14.3	38.7	39.5	38.9	29.7	34.2	33.3	0.0	0.0	0.5	
Peoria MSA	26	28,033	18.7	6,484	11.2	3.8	10.4	12.1	7.7	10.6	44.3	26.9	44.7	32.4	61.5	34.0	0.0	0.0	0.2	
Bloomington MSA	27	23,621	19.4	2,911	8.4	0.0	8.2	12.6	0.0	12.2	54.2	66.7	51.7	24.7	33.3	27.2	0.0	0.0	0.7	
Champaign MSA	24	12,830	17.3	3,530	10.2	16.7	10.6	17.0	25.0	15.0	42.8	45.8	45.7	27.8	12.5	27.4	2.2	0.0	1.3	
Danville MSA	12	8,600	8.6	843	3.9	0.0	3.9	23.2	8.3	18.0	42.4	16.7	40.1	30.4	75.0	37.1	0.0	0.0	0.9	
Non-MSA	12	2,836	8.6	340	0.0	0.0	0.0	0.0	0.0	0.0	91.1	83.3	90.6	8.9	16.7	8.8	0.0	0.0	0.6	
Total	139	84,051	100.0	17,180	10.9	6.5	10.0	14.5	10.8	12.6	45.1	45.3	45.7	29.0	37.4	31.0	0.5	0.0	0.6	
<i>Source: 2021 D&B Data; 01/01/2020 - 12/13/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>																				
<i>INB National Association (10000011443) excluded from Aggregate</i>																				

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-21	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Springfield MSA	38	8,131	27.3	3,072	79.1	36.8	54.6	5.2	5.3	15.7	57.9	
Peoria MSA	26	28,033	18.7	6,484	80.5	46.2	50.6	5.8	23.1	13.7	30.8	
Bloomington MSA	27	23,621	19.4	2,911	81.6	48.1	43.8	4.8	48.1	13.5	3.7	
Champaign MSA	24	12,830	17.3	3,530	81.8	25.0	45.6	4.3	66.7	13.9	8.3	
Danville MSA	12	8,600	8.6	843	77.3	50.0	42.7	5.4	0.0	17.3	50.0	
Non-MSA	12	2,836	8.6	340	76.4	25.0	48.8	5.3	0.0	18.3	75.0	
Total	139	84,051	100.0	17,180	80.3	38.8	48.7	5.2	26.6	14.5	34.5	
<i>Source: 2021 D&B Data; 01/01/2020 - 12/13/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>												
<i>INB National Association (10000011443) excluded from Aggregate</i>												

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.