



Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

July 21, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Forcht Bank, National Association
Charter Number: 24349
2404 Sir Barton Way
Lexington, KY 40509

Office of the Comptroller of the Currency
10200 Forest Green Blvd, Suite 501
Louisville, KY 40223

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.

Contents

Overall CRA Rating	1
Description of Institution	1
Scope of the Evaluation	3
Discriminatory or Other Illegal Credit Practices Review	4
Multistate Metropolitan Statistical Area Rating	5
Cincinnati-Middletown MMSA.....	5
State Rating	10
State of Kentucky	10
Appendix A: Scope of Examination	A-1
Appendix B: Summary of MMSA and State Ratings	B-1
Appendix C: Definitions and Common Abbreviations.....	C-1
Appendix D: Tables of Performance Data.....	D-1

Overall CRA Rating

Institution's CRA rating: Satisfactory

The lending test rating: Satisfactory

The community development test rating: Outstanding

The major factors that support these ratings include:

- The lending test rating is based on a combination of the multistate metropolitan statistical area (MMSA) and state rating areas. The primary factor in the satisfactory lending test was the performance in the state of Kentucky with majority lending and deposit activity.
- A substantial majority of Forcht Bank, National Association's (Forcht or bank) loans are inside its assessment areas (AA).
- Forcht's loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, and credit needs of its AAs.
- The community development (CD) test rating is based on excellent responsiveness to CD needs through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AAs.
- The bank did not receive any CRA-related complaints during the evaluation period.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio was reasonable. Forcht's LTD ratio averaged 75.4 percent over the 12-quarter evaluation period, with a quarterly high of 82.6 percent and a quarterly low of 61.7 percent. The bank's LTD ratio was reasonable compared to 15 similarly situated banks with a combined average LTD of 75.9 percent.

Lending in Assessment Area

A substantial majority of the bank's loans were inside its AAs. The bank originated and purchased 81.0 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.

Loan Category	2022-2024											
	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)		
	Inside		Outside			Inside		Outside				
	#	%	#	%		\$	%	\$	%			
Home Mortgage	981	80.54	237	19.46	1,218	339,141	74.86	113,886	25.14	453,027		
Small Business	70	87.5	10	12.5	80	13,932	76.1	4,382	23.9	18,314		
Total	1051	81.0	247	19.0	1,298	353,073	74.9	118,268	25.1	471,341		

Source: 1/1/2022 - 12/31/2024 Bank Data.
Due to rounding, totals may not equal 100.0%

Description of Institution

Forcht is a multi-state financial institution headquartered in Lexington, Kentucky, in Fayette County. The bank is a wholly-owned subsidiary of Forcht Bancorp, Inc, a single bank holding company located in Lexington, Kentucky.

The bank offers traditional banking products and services to serve its communities. Retail product offerings include one- to four-family home purchase, home improvement, construction, and home equity lines of credit alongside consumer loans and credit cards. Business offerings include loans secured by commercial real estate, other business loans, agriculture-related loans, working capital lines of credit, and business credit cards. Forcht offers a variety of personal and business checking and savings account products alongside online and mobile banking services for both consumer and business customers.

As of December 31, 2024, the bank reported \$1.6 billion in assets, \$1.4 billion in deposits, \$1.1 billion in total loans, and \$133 million in tier 1 capital. The loan portfolio breakdown was as follows:

Loan Portfolio Summary by Loan Type December 31, 2025		
Loan Category	\$ (000)	% of total loans
Loans Secured by Real Estate	\$1,014,012	90.5
Consumer Loans	\$24,778	2.2
Commercial Loans	\$58,545	5.2
Agricultural Loans	\$15,423	1.4
Other Loans	\$6,393	0.6
Total Loans	\$1,120,151	100.0

Forcht designated four AAs for CRA purposes: Cincinnati OH-KY-IN MSA (Cincinnati MMSA), Lexington-Fayette, KY MSA (Lexington MSA), Louisville-Jefferson County, KY-IN MSA (Louisville MSA), and the KY Non-MSA comprised of seven counties. The bank served its communities through 23 locations and two loan production offices within 13 counties throughout Kentucky and Ohio. Five of the locations are in moderate-income tracts, and eight are in underserved or distressed middle-income tracts. All offices have drive-up facilities and offer interactive teller machine services.

Competition in the banks AAs is strong. In Kentucky, there are 54 banks, with 442 branches, and in the Cincinnati MMSA, there are 49 banks with 352 branches. These include branches of large national banks, regional banks, and small community banks.

Based on seven community contacts located throughout Forcht's four AAs, affordable housing, high quality housing, transport improvements, quality jobs, small business loans, and home improvement lending were identified as primary needs. Financial literacy and education were also identified as a need. Additional information can be found in the *Description of Operations in Cincinnati-Middletown MMSA* and *Description of Institution's Operations in Kentucky* sections.

There are no legal or financial impediments affecting Forcht's ability to meet the credit needs of its AAs. The last CRA evaluation was performed by the Office of the Comptroller of the Currency (OCC) on August 29, 2022. The bank received a satisfactory rating.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The OCC assessed Forcht's CRA performance using the OCC's Intermediate Small Bank CRA examination procedures, which include a lending test and CD Test. The lending test evaluated the bank's record of meeting the credit needs of its AAs through lending activities from January 1, 2022, through December 31, 2024. The CD Test evaluated the bank's CD lending, qualified investments, and CD service activities for the same period.

Examiners used call report data and the bank's internal reporting as of December 31, 2024, to determine Forcht's quarterly LTD ratio. The lending test included an analysis of the primary loan product for each AA. The primary loan products were home mortgage loans and small business loans. The OCC analyzed all Home Mortgage Disclosure Act (HMDA) reportable loans and a random sample of small loans to businesses. To perform a meaningful analysis for lending performance, a minimum of 20 loans were sampled for each loan product and each analysis period. Examiners also reviewed all CD loans, qualified investments, and CD services submitted to evaluate the bank's responsiveness to the AA's credit needs.

For analysis purposes, examiners compared the bank's lending performance with demographic data from the 2020 United States (U.S.) Census for the loan originations and purchases during the evaluation period.

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 AAs located within the same metropolitan statistical area (MSA), MMSA, or combined statistical area (CSA), if applicable 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 *Appendix A: Scope of the Examination* for a list of products reviewed with the AAs.

Ratings

The bank's overall rating is a blend of the state of Kentucky and Cincinnati-Middletown KY-OH MMSA ratings. The state of Kentucky rating was based on a full-scope review of KY Non-MSA and a limited-scope review of the Louisville MSA and Lexington MSA. Each of the Louisville MSA and Lexington MSA accounted for 7.1 percent of branches and 10.1 percent and 9.9 percent of deposits, respectively.

The MMSA rating and state ratings in rating areas with a single AA are based on performance in that AA. The MMSA and state ratings in rating areas with multiple AAs are based on the weighted-average conclusions in those AAs. Refer to the "Scope" section under each state and MMSA rating 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) (March 29, 2024) in determining a national banks 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 Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) 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.

Multistate Metropolitan Statistical Area Rating

Cincinnati-Middletown MMSA

CRA rating for Cincinnati-Middletown:¹ Satisfactory

The lending test rating: Satisfactory

The community development test rating: Outstanding

The major factors that support these ratings include:

- The bank exhibited excellent geographic distribution of loans in the Cincinnati MMSA.
- The bank exhibited a reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.
- The bank exhibited excellent responsiveness to CD needs in the Cincinnati-Middletown MMSA through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AA.
- Forcht did not receive any CRA-related complaints during the evaluation period.

Description of Institution's Operations in Cincinnati-Middletown MMSA

The Cincinnati MMSA is comprised of Hamilton and Clermont counties in Ohio and Boone, Grant, and Kenton counties in Kentucky. The AA consisted of 355 census tracts (CT) with 36 low-income, 85 moderate-income, 123 middle-income, 97 upper-income, and 14 with income level not available. The bank operated six branches and six deposit-taking automated teller machines (ATM).

The following table shows demographic information for the Cincinnati MMSA:

Assessment Area(s) - Cincinnati-Middletown MMSA							2022-2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #	
Geographies (Census Tracts)	355	10.14	23.94	34.65	27.32	3.94	
Population by Geography	1,369,213	7.47	23.96	36.08	30.64	1.85	
Housing Units by Geography	593,742	8.63	25.01	35.43	28.62	2.31	
Owner-Occupied Housing by Geography	346,274	3.97	19.91	38.88	36.42	0.83	
Occupied Rental Units by Geography	198,806	14.67	32.42	31.06	17.91	3.94	
Vacant Units by Geography	48,662	17.08	31.04	28.82	16.85	6.21	
Businesses by Geography	61,970	6.56	21.47	32.99	37.31	1.67	
Farms by Geography	1,871	3.90	21.11	39.18	34.42	1.39	
Family Distribution by Income Level	334,508	22.40	17.15	20.51	39.94	0.00	
Household Distribution by Income Level	545,080	26.42	15.86	17.31	40.41	0.00	
Unemployment rate (%)	4.83	11.67	6.25	3.87	3.12	12.42	
Households Below Poverty Level (%)	12.38	34.61	17.33	8.78	4.98	39.56	
Median Family Income (17140 – Cincinnati OH-KY-IN MSA)	\$83,600				Median Housing Value	\$156,900	
Median Family Income (17140 – Cincinnati OH-KY-IN MSA) for 2024	\$103,500				Median Gross Rent	\$861	
					Families Below Poverty Level	8.78	
FFIEC Files – 2020 Census and 2024 Census							
2024 Dun & Bradstreet SBSF Demographics							
Due to rounding, totals may not equal 100.0%							

¹MMSA ratings reflect performance within the multistate metropolitan statistical area. Statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

Assessment Area(s) - Cincinnati-Middletown MMSA						
2022-2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
(*) The NA category consists of geographies that have not been assigned an income classification						

Economic conditions in the AA have been favorable compared to statewide measures in Kentucky and Ohio. Strength in the labor market has weakened slightly over the assessment period, but the MMSA remains near full employment. All counties in the MMSA have had lower unemployment rates than the host state rate for the same year. The Ohio labor market has remained consistently stronger than the Kentucky market during all three years.

Average Annual Unemployment Rate			
	2022	2023	2024
Cincinnati MMSA	3.5	3.5	4.2
Kentucky	4.0	4.3	5.1
<i>Boone</i>	3.3	3.8	4.5
<i>Grant</i>	3.8	4.2	5.0
<i>Kenton</i>	3.4	3.8	4.5
Ohio	4.0	3.7	4.3
<i>Clermont</i>	3.6	3.4	4.1
<i>Hamilton</i>	3.6	3.4	4.1

The local economy is highly diversified with prominent manufacturing, finance, healthcare, and retail sector presence. The largest private employers in the MMSA include Cincinnati Children's Hospital, Procter and Gamble, St Elizabeth Healthcare, TriHealth, GE Aerospace, and Kroger.

The bank has strong competition in the Cincinnati MMSA. According to the June 30, 2024, FDIC deposit market share data, Forcht ranked 18th out of 49 banks with 0.2 percent market share. Major competitors in the AA include U.S. Bank, National Association with 57.7 percent market share; Fifth Third Bank, National Association with 25.8 percent market share; and PNC Bank, National Association with 4.2 percent market share.

In the performance context, examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Assuming a 30-year mortgage with a 6.25 percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$51,750 per year (or less than 50 percent of the 2020 FFIEC median family income in the AA) could afford a \$204,685 mortgage with a payment of \$1,294 per month. A moderate-income borrower making \$82,800 per year (or less than 80 percent of the 2020 FFIEC median family income in the AA) could afford a \$327,496 mortgage with a payment of \$2,070 per month. This illustrates that low-income borrowers were challenged to qualify for a mortgage loan in the Cincinnati MMSA with an estimated payment of \$1,713. The median housing value in the Cincinnati MMSA was \$300,000 in 2022 and \$319,050 in 2024 reflecting a 6.4 percent change according to Realtor.com data.

As part of this evaluation, examiners obtained information from the representatives of four CD organizations active in the AA. Affordable housing and housing renovation were identified as local AA needs. All organizations noted a declining trend in housing availability after the pandemic which has been driven by unstable and increasing construction costs. The contacts also identified a need for seed

funding for new entrepreneurs in the AA. Half of interviewed organizations noted their own needs for volunteers to support financial education and board governance.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CINCINNATI MMSA

LENDING TEST

The bank's performance under the lending test in the Cincinnati MMSA is **Satisfactory**.

Based on a full-scope review, the bank's performance in the Cincinnati MMSA was reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibited excellent geographic distribution of loans in the Cincinnati MMSA.

Home Mortgage Loans

Refer to Table 7 in *Appendix D: Tables of Performance Data* for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of the bank's home mortgage loans was excellent. The bank's lending in both low- and moderate-income CTs exceeded both the demographic and aggregate comparators.

Small Loans to Businesses

Refer to Table 9 in *Appendix D: Tables of Performance Data* for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of the bank's small loans to businesses was reasonable. The bank's lending in low-income CTs was near to both the demographic and aggregate comparators. The bank's lending in moderate-income CTs was below both the demographic and aggregate comparators.

Lending Gap Analysis

Examiners reviewed demographic summary data and mapping reports to identify any gaps in the geographic distribution of the bank's home mortgage loans in the Cincinnati MMSA during the evaluation period. The analysis did not identify any unexplained or conspicuous gaps in the bank's lending patterns, given performance context.

Distribution of Loans by Income Level of the Borrower

The bank exhibited 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 8 in *Appendix D: Tables of Performance Data* for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The bank's distribution of loans to borrowers of different income levels was reasonable when considering performance context discussed above. The distribution of loans to low-income borrowers was near to aggregate comparators but below the demographic comparator. The distribution of loans to moderate-income borrowers was well below both the demographic and aggregate comparators. The bank also reported 35.1 percent of loans with income not available, indicating an elevated level of investor-owned and multifamily loans.

Small Loans to Businesses

Refer to Table 10 in *Appendix D: Tables of Performance Data* 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 small loans to businesses of different sizes was reasonable. The percentage of small loans to businesses originated or purchased was below the demographic comparator but was consistent with aggregate lending performance.

Responses to Complaints

Forcht did not receive any CRA-related complaints during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the CD Test in the Cincinnati MMSA is **Outstanding**.

The bank exhibited excellent responsiveness to CD needs in the Cincinnati-Middletown MMSA through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AA.

Number and Amount of Community Development Loans

Refer to the CD Loan table below for the facts 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.

Table 3: Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Cincinnati MMSA	10	100.0	4,511	100.0

During the evaluation period, the bank originated 10 CD loans totaling \$4.5 million or 11.6 percent of allocated tier 1 capital. These included seven loans worth \$4.1 million for affordable housing projects. The bank has made additional efforts to increase availability and affordability of credit for CD purposes in the Cincinnati MMSA.

The following are examples of CD loans the bank originated in the MMSA:

- The bank originated seven new loans for the purchase and improvement of 78 units to be rented at rates below the established fair market rate across the AA, fulfilling an AA need. The bank extended \$942,000 for 22 units in Boone County, Kentucky in the largest project.

Number and Amount of Qualified Investments

Table 4: Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Cincinnati MMSA	0	0	9	2,285	9	100	2,285	100	0	0

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

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

The bank purchased two school bonds supporting low-to-moderate income school districts within the MMSA. These districts have greater than 50 percent of students qualifying for free or reduced meals under the United States Department of Agriculture (USDA) School Lunch Program.

In addition to investments, the bank made \$970 worth of donations to qualified community organizations in the AA. These donations went to multiple food pantries and a low-income support center.

Extent to Which the Bank Provides Community Development Services

Forcht officers and employees serve on boards or in other business capacities to provide technical and financial expertise to various organizations supporting community service needs in the AA. Bank officers and employees have held a variety of positions at CD organizations including board member, treasurer, committee member, secretary, and accounting advisor. Many employees have also been involved in financial literacy education initiatives serving low-and-moderate income schools.

The following are examples of CD services provided by board and bank employees:

- A bank employee served as an advisory member for a local chamber of commerce and economic development, an organization with promotes development through connections between the business and civic communities in the Northern Kentucky region. This organization helps support policy and infrastructure that promotes job creation in the area.
- Four bank employees served in an ongoing program to teach basic financial literacy to elementary school students enrolled in Cincinnati Public Schools.
- Two bank employees served to teach and mentor students on financial literacy and career planning at Grant County Schools.

State Rating

State of Kentucky

CRA rating for the State of Kentucky²: Satisfactory

The lending test rating: Satisfactory

The community development Test rating: Outstanding

The major factors that support these ratings include:

- The bank exhibited a reasonable geographic distribution of loans in the state.
- The bank exhibited a reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.
- The bank exhibited excellent responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD.
- Forcht did not receive any CRA-related complaints during the evaluation period.

Description of Institution's Operations in Kentucky

Forcht designated three AAs in the state of Kentucky. They include portions of the Lexington MSA, portions of the Louisville MSA, and the KY Non-MSA comprised of seven counties. There were no changes in these AAs during the evaluation period. Refer to appendix A for a complete list of counties reviewed.

As of December 31, 2024, Forcht had nine branches and 20 deposit-taking ATMs within these AAs. Kentucky is the largest rating area in terms of deposits and branches. Based on the June 30, 2024, FDIC summary of deposit information, Forcht had \$960 million in deposits in these AAs, which represented 70.8 percent of the bank's total deposits. The bank ranked 12th in deposit market share with 2.0 percent out of 55 banks. The top three competitors had 44.6 percent of the market share and included PNC Bank, National Association with 42 branches and 17.4 percent market share; JPMorgan Chase Bank, National Association with 30 branches and 17.3 percent market share; and Fifth Third Bank, National Association with 35 branches and 10.0 percent market share.

KY Non-MSA

The following table provides a summary of the demographic information for the KY Non-MSA for 2022-2024:

Assessment Area(s) – KY Non-MSA							2022-2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #	
Geographies (Census Tracts)	102	3.92	21.57	42.16	31.37	0.98	
Population by Geography	324,383	2.75	20.42	44.46	31.53	0.83	
Housing Units by Geography	141,030	2.53	22.21	44.98	29.62	0.66	

² This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

Assessment Area(s) – KY Non-MSA										
2022-2024										
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #				
Owner-Occupied Housing by Geography	80,574	1.76	21.28	44.04	32.37	0.55				
Occupied Rental Units by Geography	40,398	3.57	22.64	42.74	29.83	1.22				
Vacant Units by Geography	20,058	3.52	25.09	53.25	18.15	0.00				
Businesses by Geography	11,417	1.74	22.54	42.44	31.12	2.16				
Farms by Geography	699	1.00	21.03	42.06	34.91	1.00				
Family Distribution by Income Level	80,844	23.44	15.82	17.81	42.92	0.00				
Household Distribution by Income Level	120,972	26.48	14.58	14.54	44.39	0.00				
Unemployment rate (%)	5.95	12.98	7.18	5.67	5.14	6.73				
Households Below Poverty Level (%)	22.50	51.14	33.00	20.05	16.05	40.47				
Median Family Income (Non-MSAs – KY)	\$53,778		Median Housing Value		\$114,500					
Median Family Income (Non-MSAs - KY) for 2024	\$66,100		Median Gross Rent		\$662					
			Families Below Poverty Level		16.61					
<i>FFIEC File - 2020 Census and 2024 Census</i>										
<i>2024 Dun & Bradstreet SBSF Demographics</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>										

The KY Non-MSA is comprised of seven counties: Green, Knox, Laurel, Madison, Pulaski, Taylor, and Whitley. The total population of the KY Non-MSA was 324,383 in 2024. The AA consisted of 102 CTs with four low-income tracts, 22 moderate-income tracts, 43 middle-income tracts, 32 upper-income tracts, and one tract with income level not available.

All middle-income CTs in Green, Knox, and Whitley counties were designated as distressed or underserved by the Board of Governors of the Federal Reserve System, FDIC, and OCC during the evaluation period. Laurel County middle-income CTs were designated as distressed beginning in 2023. Annual designations of distressed or underserved nonmetropolitan middle-income geographies are determined based on rates of poverty, unemployment, and population loss or population size, density, and dispersion.

In the performance context, examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Assuming a 30-year mortgage with a 6.25 percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$33,050 per year (or less than 50 percent of the 2024 FFIEC median family income in the AA) could afford a \$134,193 mortgage with a payment of \$826 per month. A moderate-income borrower making \$52,880 per year (or less than 80 percent of the 2024 FFIEC median family income in the AA) could afford a \$214,709 mortgage with a payment of \$1,322 per month. This illustrates that both low- and moderate-income borrowers were challenged to qualify for a mortgage loan in the KY Non-MSA with an estimated payment of \$1,435. The median housing value in the KY Non-MSA was \$224,500 in 2022 and \$267,290 in 2024 reflecting a 19.0 percent change according to Realtor.com data.

According to the Bureau of Labor Statistics, as of December 31, 2024, unemployment rates for the counties in this AA ranged from 3.4 percent to 8.5 percent during 2022, 2023, and 2024. The average unemployment rates in 2024 for Kentucky and the nation were 5.1 percent and 4.1 percent, respectively. Major industries in this AA include office and administrative support, sales, production workers, and educational services.

The bank has moderate competition within the AA. The June 30, 2024, FDIC Deposit Market Share Report indicated Forcht ranked second with 9.8 percent market share. Competition in the AA included

local community and regional banks. Major competitors in the AA include Community Trust Bank, Inc. (10.1 percent market share), Cumberland Valley National Bank & Trust company (9.1 percent market share) and Whitaker Bank (7.1 percent market share).

Examiners relied on three community contacts to understand the AA's needs and opportunities. These community contacts represented two social service organizations and one affordable housing organization. They indicated the needs of low-cost funding to support the creation of affordable housing, financial literacy classes, and volunteers on local boards. Forcht has actively provided funding for Federal Home Loan Bank Welcome Home program applications to facilitate the construction of five single-family homes for low- and moderate-income clients and general donations.

Scope of Evaluation in Kentucky

Examiners selected one AA for full-scope reviews. Examiners completed a full-scope review for the KY Non-MSA as it is the largest AA in the state of Kentucky in terms of deposits, branches, and lending activity. The Lexington MSA and Louisville MSA received limited-scope reviews. Refer to the table in Appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KENTUCKY

LENDING TEST

The bank's performance under the lending test in Kentucky is **Satisfactory**.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's lending performance in the state of Kentucky was reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibited a reasonable geographic distribution of loans in the state.

Home Mortgage Loans

Refer to Table 7 in *Appendix D: Tables of Performance Data* for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans in the KY Non-MSA is reasonable.

The geographic distribution of the bank's home mortgage lending was reasonable. The bank's lending in low-income CTs was near to both the demographic comparator and aggregate lending. The bank's lending in moderate-income CTs was near to the demographic comparator but exceeded aggregate lending.

Small Loans to Businesses

Refer to Table 9 in *Appendix D: Tables of Performance Data* for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of the bank's small loans to businesses was reasonable. The bank's lending in low-income CTs was well below both the demographic comparator and aggregate lending in the geography. The bank's lending in moderate-income CTs was near to the demographic comparator but exceeded the aggregate lending in the geography.

Lending Gap Analysis

Examiners review demographic summary data and mapping reports to identify any gaps in the geographic distribution of the bank's home mortgage loans in the KY-based AAs during the evaluation period. The analysis did not identify any unexplained or conspicuous gaps in the bank's lending patterns, given the performance context.

Distribution of Loans by Income Level of the Borrower

The bank exhibited 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 8 in *Appendix D: Tables of Performance Data* for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The bank's distribution of loans to borrowers of different income levels was excellent. The distribution of loans to low-income borrowers was well below the demographic comparator but exceeded the aggregate lending performance. The distribution of loans to moderate-income borrowers exceeded both the demographic comparator and aggregate lending performance.

Small Loans to Businesses

Refer to Table 10 in *Appendix D: Tables of Performance Data* for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The overall distribution of loans to businesses of different sizes was reasonable. The bank was below the demographic comparator but near to the aggregate lending performance.

Responses to Complaints

Forcht did not receive any CRA-related complaints 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 Lexington MSA and Louisville MSA was consistent with the bank's overall performance under the lending test in the full scope area.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the CD test in the state of Kentucky is **Outstanding**.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibited excellent responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's KY Non-MSA.

Number and Amount of Community Development Loans

The CD 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.

Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
KY Non-MSA	16	61.5	3,982	30.2
Lexington MSA	4	15.4	2,350	17.8
Louisville MSA	6	23.1	6,852	52.0
Total	26	100.0	13,184	100.0

The bank originated 16 CD loans with two small business loans supporting new jobs in the area and 14 loans supporting the operations of community service providers.

The following are examples of CD loans the bank originated or purchased in the KY Non-MSA:

- The bank provided operating lines of credit supporting the operations of a community health center servicing multiple low-income and poverty distressed census tracts in a designated health service shortage area.
- The bank provided loans and lines of credit supporting non-profits which support disadvantaged families, families in distress, and children from those situations.
- The bank originated a loan for \$1.3 million to a lessor of a commercial office center who provided office space to nonprofits below market rates.

Number and Amount of Qualified Investments

Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
KY Non-MSA	6	4,005	39	9,409	45	52.9	13,414	49.7	0	0
Lexington MSA	4	1,433	14	85	18	21.2	1,517	5.6	0	0
Louisville MSA	1	1,421	3	1	4	4.7	1,421	5.3	0	0
Broader Statewide or Regional Area	16	9,405	2	1,253	18	21.2	10,659	39.5	0	0
Total	27	16,264	58	10,747	85	100.0	27,011	100.0	0	0

The bank purchased 13 CD investments during the evaluation period for \$9.4 million or 13.9 percent of tier 1 capital. All new investments benefitted school districts where a majority of students qualify for free or reduced meals under the USDA School Lunch Program. Additionally, the bank held six prior period investments with a book value of \$4.0 million.

In addition to these qualified investments, the bank made donations of \$5,205 benefitting low- and moderate-income areas in the AA. These donations benefitted food banks, homeless shelters, clothes closets, a volunteer fire department, and local school districts.

Statewide

The bank purchased two investments totaling \$1.3 million in the broader statewide area supporting local school districts with majority students qualifying for free or reduced meals without a purpose, mandate, or function to benefit the bank's AAs. Also, the bank held 16 prior period investments totaling \$9.4 million and without a purpose, mandate, or function to benefit the bank's AAs. These investments supported local school districts where the majority of students qualified for free or reduced meals and affordable housing needs.

Extent to Which the Bank Provides Community Development Services

Forcht officers and employees serve on boards or in other business capacities to provide technical and financial expertise to various organizations supporting community service needs in the AA. Bank operations in this AA are well established and key figures in the communities. Bank officers and employees have held a variety of positions at CD organizations including board member, treasurer, committee member, secretary, and accounting advisor. Many employees have also been involved in financial literacy education initiatives serving schools in low-and-moderate income areas.

- A bank employee served as a board member for a local community organization which helps low- and moderate-income families in central Kentucky become financially self-sufficient and obtain affordable housing as first-time homebuyers.
- Fourteen bank employees and officers worked to provide financial literacy education and career counseling to students at local school systems. These employees volunteered on multiple occasions in all three years of the evaluation period.
- A bank employee served as a board member and treasurer for a local nonprofit who operates a homeless shelter in the AA. This organization provides material assistance to low- and moderate-

income residents of the AA through shelter services, career services, housing coordination, and nutritional assistance in coordination with local food pantries.

Conclusions for Areas Receiving Limited Scope Reviews

Based on limited-scope reviews, the bank's performance under the CD Test in the Lexington MSA and the Louisville MSA is consistent with the overall performance under the CD test in the full-scope KY Non-MSA area.

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, 2022 to December 31, 2024	
Bank Products Reviewed:	Home mortgage and small business Community development loans, qualified investments, and community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Abaco, Inc.	Investment subsidiary engaged in management of investment securities.	Qualified Investments
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		
Cincinnati-Middletown MMSA	Full-scope	Kentucky counties of Boone, Grant, and Kenton. Select CT in Ohio counties of Clermont and Hamilton.
Kentucky		
KY Non-MSA	Full-scope	Green, Knox, Laurel, Madison, Pulaski, Taylor, and Whitley counties
Lexington-Fayette MSA	Limited-scope	Fayette County only
Louisville-Jefferson County, KY-IN MSA	Limited-scope	Jefferson County only

Appendix B: Summary of MMSA and State Ratings

RATINGS			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/ Multistate Rating
Forcht Bank, NA	Satisfactory	Outstanding	Satisfactory
MMSA or State:			
Cincinnati-Middletown MMSA	Satisfactory	Outstanding	Satisfactory
Kentucky	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 CD loans and qualified investments, branch distribution, and CD services).

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

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the 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.

Multistate Metropolitan Statistical Area (MMSA): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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.

Prior Period Investments: Investments made in a previous evaluation period that are outstanding as of the end of the evaluation period.

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 multistate 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 multistate metropolitan statistical area, the institution will receive a rating for the multistate 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.

Unfunded Commitments: Legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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/AA. 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 7. 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 8. 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/AA. The table also presents aggregate peer data for the years the data is available.

Table 9. 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 AA.

Table 10. 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 11. 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 AA.

Table 12. 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 \$500,000) 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 13. 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 14. 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/AA.

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.

Cincinnati-Middletown MMSA

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography															2022 - 2024				
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	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
Cincinnati MMSA	362	171,119	100.00	82,124	3.97	4.97	3.93	19.91	29.28	23.73	38.88	35.64	37.90	36.42	29.83	33.63	0.83	0.28	0.78
Total	362	171,119	100.00	82,124	3.97	4.97	3.93	19.91	29.28	23.73	38.88	35.64	37.90	36.42	29.83	33.63	0.83	0.28	0.78

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower															2022 - 2024				
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Cincinnati MMSA	362	171,119	100.00	82,124	22.40	7.18	11.78	17.15	8.84	22.27	20.51	13.26	20.93	39.94	35.64	29.17	--	35.08	15.85
Total	362	171,119	100.00	82,124	22.40	7.18	11.78	17.15	8.84	22.27	20.51	13.26	20.93	39.94	35.64	29.17	--	35.08	15.85

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																	2022 - 2024		
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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Cincinnati MMSA	21	6,015	100.0	54,299	6.56	4.8	6.38	21.47	14.3	21.13	32.99	38.1	34.14	37.31	33.3	36.81	1.67	9.5	1.55
Total	21	6,015	100.0	54,299	6.56	4.8	6.38	21.47	14.3	21.13	32.99	38.1	34.14	37.31	33.3	36.81	1.67	9.5	1.55

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2024		
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Cincinnati MMSA	21	6,015	100.0	54,299	80.93	52.4	52.85	8.97	42.9	10.10	4.8		
Total	21	6,015	100.0	54,299	80.93	52.4	52.85	8.97	42.9	10.10	4.8		

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Kentucky

Assessment Area:	2022 - 2024																		
	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	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
KY Non MSA	403	84,994	65.11	13,307	1.76	0.99	1.41	21.28	20.84	15.83	44.04	45.91	42.23	32.37	31.27	39.87	0.55	0.99	0.66
Lexington MSA	81	39,418	13.09	16,647	3.48	4.94	4.08	17.61	23.46	16.14	35.74	33.33	38.89	42.61	38.27	40.07	0.57	--	0.77
Louisville MSA	135	43,610	21.81	42,627	4.52	4.44	5.13	20.72	28.89	20.67	40.17	40.00	38.90	33.94	26.67	34.69	0.65	--	0.59
Total	619	168,022	100.00	72,581	3.66	2.26	4.21	20.21	22.94	18.74	40.16	42.97	39.50	35.36	31.18	36.87	0.61	0.65	0.65

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Assessment Area:	2022 - 2024																		
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
KY Non MSA	403	84,994	65.11	13,307	23.44	7.94	4.81	15.82	17.12	14.82	17.81	17.62	22.84	42.92	42.93	41.35	--	14.39	16.18
Lexington MSA	81	39,418	13.09	16,647	22.45	6.17	7.90	16.17	12.35	18.30	19.17	9.88	20.27	42.21	39.51	38.46	--	32.10	15.07
Louisville MSA	135	43,610	21.81	42,627	22.22	4.44	11.72	18.11	13.33	22.45	19.40	13.33	19.85	40.27	31.11	31.87	--	37.78	14.11
Total	619	168,022	100.00	72,581	22.56	6.95	9.58	17.15	15.67	20.10	18.97	15.67	20.49	41.32	39.90	35.12	--	21.81	14.71

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																2022 - 2024			
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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
KY Non MSA	28	4,069	41.2	10,225	1.74	0.0	1.90	22.54	21.4	19.76	42.44	46.4	45.11	31.12	32.1	31.62	2.16	0.0	1.61
Lexington MSA	20	3,367	29.4	15,609	4.79	10.0	4.66	18.26	20.0	17.39	32.88	30.0	33.54	36.68	40.0	38.54	7.38	0.0	5.86
Louisville MSA	20	5,923	29.4	33,698	7.31	0.0	6.00	17.69	25.0	16.53	36.81	65.0	36.21	36.20	10.0	39.48	1.98	0.0	1.78
Total	68	13,359	100.0	59,532	5.77	2.9	4.95	18.63	22.1	17.31	36.74	47.1	37.04	35.49	27.9	37.88	3.38	0.0	2.82

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data,

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues										2022-2024			
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
KY Non MSA	28	4,069	41.2	10,225	80.63	42.9	50.98	8.15	42.9	11.22	14.3		
Lexington MSA	20	3,367	29.4	15,609	81.42	55.0	51.73	8.46	45.0	10.12	0.0		
Louisville MSA	20	5,923	29.4	33,698	82.39	65.0	50.65	8.33	35.0	9.27	0.0		
Total	68	13,359	100.0	59,532	81.86	52.9	50.99	8.33	41.2	9.81	5.9		

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data,

Due to rounding, totals may not equal 100.0%