



## **PUBLIC DISCLOSURE**

May 16, 2022

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

LCNB National Bank  
Charter Number 2360

2 North Broadway  
Lebanon, OH 45036

Office of the Comptroller of the Currency

West Lake Center  
4555 Lake Forest Drive, Suite 520  
Blue Ash, OH 45242-3760

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 following table indicates the performance level of LCNB National Bank (LCNB or the bank) with respect to the Lending, Investment, and Service Tests:

Performance Levels	LCNB National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

\* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based on the state rating and the following overall conclusions.
  - Lending levels reflect good responsiveness to assessment area (AA) credit needs.
  - A substantial majority of the bank’s loans are inside its AAs.
  - The bank exhibits a good distribution of loans to individuals of different incomes and businesses and farms of different sizes.
- The Investment Test rating is based on the state rating and overall good performance in the AAs.
- The Service Test rating is based on the state rating and overall good performance in the AAs. Service delivery systems are accessible to geographies and individuals of different income levels in the bank’s AA.

### Lending in Assessment Area

A substantial majority of the bank’s loans are in its AAs.

The bank originated and purchased 87.3 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.

Lending Inside and Outside of the Assessment Area						
Loan Category	Number of Loans		Total	Dollar Amount of Loans \$(000s)		Total
	Inside	Outside		Inside	Outside	

	#	%	#	%	#	\$	%	\$	%	\$(000s)
Home Mortgage										
2019	340	85.0	60	15.0	400	84,336	74.8	28,468	25.2	112,804
2020	648	82.0	142	18.0	790	132,668	78.3	36,874	21.7	169,542
2021	529	90.4	56	9.6	585	194,165	78.9	51,999	21.1	246,164
<b>Subtotal</b>	1,517	85.5	258	14.5	1,775	411,169	77.8	117,341	22.2	528,510
Small Business										
2019	268	84.8	48	15.2	316	53,781	78.1	15,038	21.9	68,819
2020	565	87.2	83	12.8	648	91,844	82.9	18,988	17.1	110,832
2021	543	91.7	49	8.3	592	77,983	92.6	6,238	7.4	84,221
<b>Subtotal</b>	1,376	88.4	180	11.6	1,556	223,608	84.7	40,264	15.3	263,872
Small Farm										
2019	33	94.3	2	5.7	35	4,612	92.9	355	7.1	4,967
2020	52	96.3	2	3.7	54	10,054	95.0	525	5.0	10,579
2021	59	96.7	2	3.3	61	8,293	92.5	675	7.5	8,968
<b>Subtotal</b>	144	96.0	6	4.0	150	22,959	93.7	1,555	6.3	24,514
<b>Total</b>	3,037	87.3	444	12.7	3,481	657,736	80.5	159,160	19.5	816,896
<i>Source: Bank Data. Evaluation Period – 1/1/19 – 12/31/21.</i>										
<i>Due to rounding, totals may not equal 100.0%.</i>										

## Description of Institution

LCNB is a federally chartered national bank headquartered in Lebanon, Ohio. As of December 31, 2021, LCNB had total assets of \$1.9 billion with \$1.4 billion in net loans and leases, \$1.6 billion in total deposits, and \$175.6 million in tier 1 capital. LCNB is a subsidiary of LCNB Corp., also headquartered in Lebanon, Ohio. The bank has two affiliates, LCNB Title Company and LCNB Risk Management; however, affiliate data was not considered in this evaluation. There was no merger or acquisition activity that affected the scope of the bank's operations during the evaluation period.

LCNB's primary products are mortgage and commercial lending. As of December 31, 2021, net loans and leases represented 71.8 percent of total assets. By dollar volume, the \$1.4 billion loan portfolio is 89.3 percent real estate secured, 7.4 percent commercial and industrial, 2.5 percent consumer, and 0.8 percent agriculture. Of the real estate secured loans, 55 percent are commercial, 28.1 percent are residential, 13.7 percent are multifamily, and 3.2 percent are agriculture. The bank engages primarily in traditional deposit taking activities through physical offices.

LCNB is a single state financial institution with 36 facilities (branches and automated teller machines (ATMs)) as of December 31, 2021. The bank's only rating area is the state of Ohio. Since the prior Community Reinvestment Act (CRA) evaluation, LCNB did not open any new branches, closed four branches, and closed one loan production office (LPO). As of December 31, 2021, the bank's current

facilities included 31 full-service branches, one drive-through auto bank location, and four stand-alone ATMs. Of the 32 offices (full-service and auto bank), one branch is located in a low-income census tract (CT), five in moderate-income CTs, 19 in middle-income CTs, six in upper-income CTs, and one in a CT in which the geography has not been assigned an income classification. The four ATM-only locations are stand-alone ATMs, with one in a middle-income CT and three in upper-income CTs. Additionally, LCNB has 33 ATMs located at branch offices, with two branches having two ATMs. All branches have an ATM except for the Worthington/Columbus Branch. The ATMs do not accept deposits.

During the evaluation period, the bank closed two branches in Preble County in middle-income CTs as of May 7, 2020, and one branch in Warren County in an upper-income CT as of June 25, 2021. LCNB closed one branch in Hamilton County in a middle-income CT as of February 18, 2022, which is after the CRA evaluation period. The bank also closed their only LPO in Columbus, Ohio, as of May 31, 2019. The LPO was in a middle-income CT in Franklin County, Ohio.

The branches are primarily located throughout central and southwest Ohio. The bank entered the Columbus, Ohio, market in 2018. The bank has three AAs that are comprised of portions of three Metropolitan Statistical Areas (MSAs) in Ohio: Cincinnati (a multistate area), Dayton, and Columbus. A fourth AA is comprised of non-MSA areas in Ohio and consists of Clinton, Fayette, Preble, and Ross Counties (Non-MSA AA).

For years 2019 and 2020, the bank's Cincinnati Multistate MSA AA (Cincinnati MMSA AA) consisted of Butler and Warren Counties, six CTs in Clermont County, and 89 CTs in Hamilton County. In 2021, the bank revised their Cincinnati MMSA AA to include whole counties, which included Butler, Clermont, Hamilton, and Warren Counties. The counties in this AA are within Ohio, so this MMSA is not a separate rating area. For years 2019 and 2020, the bank's Columbus MSA AA (Columbus MSA AA) consisted of Franklin County and 27 CTs in Delaware County. In 2021, the bank revised their Columbus MSA AA to include whole counties, which included Delaware and Franklin Counties. For all three years of the evaluation period, the Dayton MSA AA included Montgomery County. There were no changes to the Non-MSA AA during the evaluation period, which included Clinton, Fayette, Preble, and Ross Counties.

LCNB ranked 10<sup>th</sup>, 25<sup>th</sup>, 10<sup>th</sup>, and first in deposit market share in the Cincinnati MMSA AA, Columbus MSA AA, Dayton MSA AA, and Non-MSA AA, respectively, as of the Federal Deposit Insurance Corporation's (FDIC) Deposit Market Share Report as of June 30, 2021. Primary competitors include Fifth Third Bank, National Association (N.A.), U.S. Bank N.A., JPMorgan Chase Bank, N.A., The Huntington National Bank, and Union Savings Bank.

The bank offers a full range of deposit, lending, and trust services. Deposit products include checking accounts, savings accounts, and certificates of deposit for personal or business use. Lending products consist of mortgage, personal, business, and agriculture loans. LCNB offers a full range of trust and investment services, such as personal portfolio management, estate settlement, and retirement accounts. LCNB also offers internet-banking services such as online account opening, electronic statements, mobile deposits, mobile payments, and external transfers.

The global Coronavirus Disease (also referred to as COVID-19) pandemic in 2020 impacted the local economy, including unemployment data. The Small Business Administration's (SBA) Paycheck Protection Program (PPP) provided loans to help businesses keep their workforces employed during the

COVID-19 crisis. The bank was responsive to the SBA's PPP and originated a significant volume of PPP loans in 2020 and 2021. Refer to the Lending Test section of this report for more details.

No legal, financial, or other factors impeded the bank's ability to help meet the credit needs of its AAs during the evaluation period. The bank received a Satisfactory rating at the prior CRA evaluation dated May 13, 2019.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

The Office of the Comptroller of the Currency (OCC) conducted a CRA performance evaluation to assess the bank's record of meeting the credit and CD needs of its entire community, including low- and moderate-income (LMI) areas. The OCC used large bank CRA evaluation procedures to assess the bank's performance under the Lending, Investment, and Service Tests. The evaluation period was January 1, 2019, to December 31, 2021.

For the Lending Test, the OCC evaluated home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA) and small loans to businesses and farms reported under the CRA. Under the Lending Test, the OCC performed separate analyses of the 2019 and 2020 data and the 2021 data due to the change in the AAs as of 2021 with the bank designating whole counties instead of partial counties in its AAs. LCNB did not change its lending strategy during the two analysis periods.

For the Investment and Service Tests, the OCC evaluated CD investments and services during the evaluation period. Additionally, the OCC performed separate analyses of the 2019 and 2020 information and the 2021 information due to the change in the AAs as of 2021 with the bank designating whole counties instead of partial counties in its AAs. LCNB did not change its CD investment and service strategy during the two analysis periods.

For analysis purpose, the OCC compared the bank's lending performance with demographic data from the 2015 American Community Survey (ACS) U.S. Census data and 2021 Dun and Bradstreet (D&B) data. No affiliate activity was included in this analysis. Refer to the table in appendix A, Scope of the Examination, for more information on the scope of the review.

### **Selection of Areas for Full-Scope Review**

In each state where the bank has an office, one or more 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 section 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.

LCNB has four AAs, as described above. The OCC completed a full-scope review for each AA: Cincinnati MMSA AA, Columbus MSA AA, Dayton MSA AA, and Non-MSA AA. A community

profile for each AA is provided in the “Description of Institution’s Operations in Ohio” section of this evaluation.

The OCC evaluated the bank’s performance through an analysis of home mortgage, small loans to businesses, small loans to farms, CD lending, CD investment activity, retail service activity, and CD services.

### **Ratings**

The bank’s overall rating is a blend of the state ratings. Since all LCNB’s offices are in Ohio, the bank’s rating is based on performance solely in Ohio.

The rating is based on performance in all the bank’s AAs. Performance in the Cincinnati MMSA AA was weighted most heavily as 59.1 percent of deposits and 59.4 percent of branch offices are in that AA. Additionally, approximately half of the home mortgage and small business loan originations and purchases are in the Cincinnati MMSA AA. By product type, home mortgage loans received the most weight, followed by small loans to businesses and small loans to farms. Home mortgage loans represented 50 percent by number and 62.5 percent by dollar volume of total home mortgage, small loans to businesses, and small loans to farms during the evaluation period.

### **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 C.F.R. §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 assessment area 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 (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.

## State Rating

### State of Ohio

**CRA rating for the State of Ohio<sup>1</sup>: Satisfactory.**

**The Lending Test is rated: High Satisfactory.**

**The Investment Test is rated: High Satisfactory.**

**The Service Test is rated: High Satisfactory.**

The major factors that support this rating include:

- Lending levels reflect good responsiveness to AA credit needs.
- The bank exhibits a good distribution of loans to individuals of different incomes and businesses and farms of different sizes.
- The bank is a leader in making CD loans which has a positive impact on the bank’s performance.
- LCNB’s CD investment performance is overall good in the AAs and the greater regional area.
- LCNB’s overall service test performance is good. Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank’s AA. The institution provides an adequate level of CD services.

### Description of Institution’s Operations in Ohio

All operations are in the state of Ohio. Refer to the “Description of Institution” section above for additional information. There are no substantial differences in business focus or services offered between the different AAs. LCNB selected the AAs based on their targeted lending area and deposit locations. The AAs meet the requirements of the regulation and do not arbitrarily exclude any LMI CTs. The bank is headquartered in the Cincinnati MMSA AA, with most of the lending and deposit activity in the Cincinnati MMSA AA.

#### Cincinnati MMSA AA

Demographic Information of the Assessment Area						
Assessment Area: Cincinnati MMSA AA 2019 - 2020						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #

<sup>1</sup> [This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.]

Geographies (Census Tracts)	208	14.4	20.7	34.1	28.4	2.4
Population by Geography	979,967	9.4	17.2	33.6	37.9	2.0
Housing Units by Geography	401,252	11.5	18.9	34.5	34.3	0.8
Owner-Occupied Units by Geography	251,607	4.4	14.1	37.1	44.3	0.1
Occupied Rental Units by Geography	113,245	22.6	28.0	30.0	17.4	2.0
Vacant Units by Geography	36,400	25.6	23.7	30.6	18.0	2.2
Businesses by Geography	54,834	8.3	14.8	32.4	42.8	1.7
Farms by Geography	1,775	3.7	10.5	45.2	40.3	0.3
Family Distribution by Income Level	250,648	21.2	16.0	20.1	42.6	0.0
Household Distribution by Income Level	364,852	23.6	15.1	17.0	44.2	0.0
Median Family Income MSA - 17140 Cincinnati, OH-KY-IN MSA		\$69,949	Median Housing Value			\$151,802
			Median Gross Rent			\$781
			Families Below Poverty Level			9.8%
<i>Source: 2015 ACS and 2020 D&amp;B Data. Due to rounding, totals may not equal 100.0%. (* The NA category consists of geographies that have not been assigned an income classification.</i>						

<b>Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Cincinnati MMSA AA 2021</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	375	13.9	22.1	33.9	28.0	2.1
Population by Geography	1,596,933	8.9	18.8	35.7	35.0	1.6
Housing Units by Geography	690,732	11.1	20.2	36.0	32.0	0.7
Owner-Occupied Units by Geography	402,304	4.1	15.1	39.2	41.5	0.1
Occupied Rental Units by Geography	217,225	19.6	28.3	31.9	18.8	1.4
Vacant Units by Geography	71,203	25.3	24.3	30.5	18.3	1.6
Businesses by Geography	113,426	7.4	18.0	31.5	41.9	1.3
Farms by Geography	3,083	3.5	13.6	45.1	37.6	0.2
Family Distribution by Income Level	399,586	22.3	16.1	19.4	42.2	0.0
Household Distribution by Income Level	619,529	25.8	15.2	16.6	42.4	0.0
Median Family Income MSA - 17140 Cincinnati, OH-KY-IN MSA		\$69,949	Median Housing Value			\$160,023
			Median Gross Rent			\$763
			Families Below Poverty Level			10.5%

*Source: 2015 ACS and 2021 D&B Data.*

*Due to rounding, totals may not equal 100.0%.*

*(\*) The NA category consists of geographies that have not been assigned an income classification.*

For years 2019 and 2020, the bank's Cincinnati MMSA AA consisted of Butler and Warren Counties, six CTs in northern Clermont County, and 89 CTs in Hamilton County. The Cincinnati MMSA AA was updated in 2021 to include whole counties. As of 2021, the bank's Cincinnati MMSA AA now includes Butler, Clermont, Hamilton, and Warren Counties. As of December 31, 2021, LCNB had 19 branches, 18 full-service and one limited-service auto drive-through, in this AA. There are four stand-alone ATMs in this AA. Additionally, there is an ATM at all branches in this AA, with two branches having two ATMs. Of the 19 branches, one is in a low-income CT, one is in a moderate-income CT, 14 are in middle-income CTs, two are in upper-income CTs, and one is in a CT that has not been assigned an income classification.

Based on the bank's AA in 2021 and U.S. Census data in the above table, the population in the Cincinnati MMSA AA increased by approximately 1 percent, from 2010 to 2015, which compares reasonably to the state of Ohio, which increased about the same. According to the 2015 ACS U.S. Census, the AA consists of 375 CTs, and is comprised of 52 low-income, 83 moderate-income, 127 middle-income, 105 upper-income, and eight CTs in which the geography has not been assigned any income classification.

The economic conditions in the Cincinnati MMSA AA have improved since the start of the COVID-19 pandemic and are overall stable. According to Moody's Analytics, Cincinnati's recovery from COVID-19 is improving and outperforming other major Ohio metro areas. For 2020, COVID-19 was challenging to the economy with higher-than-normal unemployment rates. According to the U.S. Bureau of Labor Statistics as of December 2021, not seasonally adjusted unemployment rates in Butler, Clermont, Hamilton, and Warren Counties were 3.1 percent, 3 percent, 3.2 percent, and 2.8 percent, respectively. These unemployment rates compare favorably to the statewide rate of 3.6 percent.

The economy in the Cincinnati MMSA AA is well diversified with little dependency on one industry. According to Moody's Analytics, top industries include trade, government, professional and business services, education and health services, leisure and hospitality, and manufacturing. Top employers in the area include Procter & Gamble Co., General Electric Co., Cincinnati Children's Hospital Medical Center, Kroger Co., TriHealth Inc., UC Health, Mercy Health, and the University of Cincinnati.

According to the 2015 ACS U.S. Census, the median housing value of owner-occupied housing units is \$160,023. With median family income of \$69,949, moderate-income families make less than \$55,959 and low-income families make less than \$34,975 annually. Median housing values are at least 2.9 times the annual income of moderate-income families and 4.6 times the annual income of low-income families. Thus, the cost of housing is a significant barrier to homeownership among LMI families. As of the 2015 ACS U.S. Census, there are 690,732 total housing units in the Cincinnati MMSA AA, of which 58.2 percent are owner-occupied, 31.5 percent are rental occupied, and 10.3 percent are vacant units. Families living below the poverty level increased from 9.8 percent as of 2019-2020 to 10.5 percent in 2021. The median age of housing stock is approximately 52 years. The cost of homeownership in older housing is typically higher than in newer housing; thus, the median age of housing in LMI geographies is also a significant barrier to mortgage lending in those CTs.

Competition for deposits in the AA is strong. As of the June 30, 2021, FDIC Deposit Market Share Report, LCNB held \$932.8 million or 0.64 percent of the deposits inside this market area. This represents 59.1 percent of LCNB’s total deposits. As of the June 30, 2021, FDIC Deposit Market Share Report, LCNB ranked 10th out of 46 deposit market competitors. The market is dominated by large financial institutions. The top five financial institutions in deposit market share are U.S. Bank N.A., Fifth Third Bank, N.A., PNC Bank, N.A., First Financial Bank, and The Huntington National Bank. These financial institutions hold 90.5 percent of total deposits in the AA.

A little over half of the bank’s home mortgage lending occurs in the Cincinnati MMSA AA. Based on the 2020 Peer Mortgage Data, LCNB has 0.44 percent of the market share for home mortgages, lending \$90.4 million and ranking 50<sup>th</sup> among 564 market participants. The market is dominated by large banks and banks with large secondary mortgage market operations. The top five institutions for home mortgage lending are Union Savings Bank, Fifth Third Bank, N.A., U.S. Bank N.A., The Huntington National Bank, and Quicken Loans, LLC. Combined these five financial institutions have 27.7 percent of the total market share.

About half of the small business lending occurs in this AA. Competition for loans is strong. According to the 2020 Peer Small Business Data, 186 lenders originated or purchased small business loans in the AA. The top five institutions for small business lending are U.S. Bank N.A., Fifth Third Bank, N.A., PNC Bank, N.A., The Huntington National Bank, and JPMorgan Chase Bank, N.A. The top five competitors hold 69.2 percent of the market share, while LCNB holds 0.64 percent, ranking 18<sup>th</sup> out of 186 lenders. According to the D&B data as of June 2021, 82.1 percent of the businesses located in the AA have gross annual revenues of \$1 million or less and 65.6 percent have fewer than five employees.

Approximately 25 percent of the bank’s farm lending occurs in this AA. According to the 2020 Peer Small Farm Data, 21 lenders originated or purchased small farm loans in the AA. The top five institutions for small farm lending are The Huntington National Bank, U.S. Bank N.A., LCNB, Peoples Bank, and Capital One Bank (USA), N.A. The top four competitors hold 72 percent of the market share, while LCNB holds 9 percent, ranking third out of 21 lenders.

Two community contacts were performed with community service organizations that serve the Cincinnati MMSA AA. The contacts discussed the need for additional support for financial literacy and general operating support for community service providers. In terms of specific lending needs, small dollar loans, automobile loans, and home repair/rehabilitation loans were all mentioned. Additionally, affordable housing is a need in the community and one contact mentioned the need for non-FHA (Federal Housing Administration) loans as these loans can be more expensive. One contact mentioned that banks have been more responsive and creative in CD services. Overall, local financial institutions are adequately meeting the credit and CD needs of the community.

Columbus MSA AA

Demographic Information of the Assessment Area						
Assessment Area: Columbus MSA AA 2019 - 2020						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	311	19.6	24.8	24.8	29.9	1.0

Population by Geography	1,362,228	13.2	23.6	26.5	35.8	1.0
Housing Units by Geography	590,977	14.9	24.5	26.6	33.7	0.3
Owner-Occupied Units by Geography	300,336	6.6	19.7	28.3	45.4	0.0
Occupied Rental Units by Geography	232,484	20.8	29.7	26.4	22.6	0.5
Vacant Units by Geography	58,157	34.0	28.4	19.0	17.9	0.7
Businesses by Geography	109,999	10.7	18.1	24.7	45.8	0.6
Farms by Geography	2,038	8.3	18.2	28.2	45.1	0.2
Family Distribution by Income Level	318,757	22.9	16.7	18.5	42.0	0.0
Household Distribution by Income Level	532,820	24.7	16.4	17.1	41.7	0.0
Median Family Income MSA - 18140 Columbus, OH MSA	\$70,454	Median Housing Value				\$163,350
		Median Gross Rent				\$857
		Families Below Poverty Level				11.6%
<i>Source: 2015 ACS and 2020 D&amp;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>						

<b>Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Columbus MSA AA 2021</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	319	19.1	24.1	25.4	30.4	0.9
Population by Geography	1,401,194	12.8	22.9	26.9	36.4	0.9
Housing Units by Geography	605,479	14.5	23.9	27.1	34.2	0.3
Owner-Occupied Units by Geography	312,391	6.4	18.9	28.8	45.9	0.0
Occupied Rental Units by Geography	234,203	20.6	29.5	26.7	22.7	0.5
Vacant Units by Geography	58,885	33.6	28.1	19.4	18.2	0.7
Businesses by Geography	118,892	10.4	17.8	24.9	46.2	0.6
Farms by Geography	2,413	7.6	16.6	29.7	45.8	0.2
Family Distribution by Income Level	329,861	22.5	16.6	18.5	42.4	0.0
Household Distribution by Income Level	546,594	24.4	16.3	17.0	42.2	0.0
Median Family Income MSA - 18140 Columbus, OH MSA	\$70,454	Median Housing Value				\$165,048
		Median Gross Rent				\$858
		Families Below Poverty Level				11.3%
<i>Source: 2015 ACS and 2021 D&amp;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>						

In 2018, LCNB entered the Columbus MSA market area after acquiring Columbus First Bank. For years 2019 and 2020, the bank's Columbus MSA AA consisted of Franklin County and 27 CTs in Delaware County. In 2021, the bank revised their Columbus MSA AA to include whole counties, which now includes Delaware and Franklin Counties in their entirety. As of December 31, 2021, LCNB has one branch in the Columbus MSA AA in an upper-income CT. There is no onsite ATM at this branch. Based on the bank's AA in 2021 and the 2015 ACS U.S. Census, the AA consists of 319 CTs, and is comprised of 61 low-income, 77 moderate-income, 81 middle-income, 97 upper-income, and three CTs in which the geography has not been assigned any income classification.

The economic conditions in the Columbus MSA AA have improved since the start of the COVID-19 pandemic and are overall stable. According to Moody's Analytics, Columbus' recovery is improving with recent job growth. For 2020, COVID-19 was challenging to the economy with higher-than-normal unemployment rates. According to the U.S. Bureau of Labor Statistics as of December 2021, not seasonally adjusted unemployment rates in Delaware and Franklin Counties were 2.4 percent and 3 percent, respectively. These unemployment rates compare favorably to the statewide rate of 3.6 percent.

The economy in the Columbus MSA AA is well diversified with little dependency on one industry. According to Moody's Analytics, top industries include trade, government, transportation and utilities, professional and business services, education and health services, leisure and hospitality, and manufacturing. Top employers in the area include Ohio State University, OhioHealth, JPMorgan Chase Bank & Co., Nationwide, and Nationwide Children's Hospital Inc.

According to the 2015 ACS U.S. Census, the median housing value of owner-occupied housing units is \$165,048. With median family income of \$70,454, moderate-income families make less than \$56,363 and low-income families make less than \$35,227 annually. Median housing values are at least 2.9 times the annual income of moderate-income families and 4.7 times the annual income of low-income families. Thus, the cost of housing is a significant barrier to homeownership among LMI families. As of the 2015 ACS U.S. Census, there are 605,479 total housing units in the Columbus MSA AA, of which 51.6 percent are owner-occupied, 38.7 percent are rental occupied, and 9.7 percent are vacant units. Families living below the poverty level slightly decreased from 11.6 percent as of 2019-2020 to 11.3 percent in 2021. The median age of housing stock is approximately 45 years. The cost of homeownership in older housing is typically higher than in newer housing; thus, the median age of housing in LMI geographies is also a significant barrier to mortgage lending in those CTs.

Competition for deposits in the AA is strong. As of the June 30, 2021, FDIC Deposit Market Share Report, LCNB held \$113.1 million or 0.13 percent of the deposits inside this market area. This represents 7.2 percent of LCNB's total deposits. As of the June 30, 2021, FDIC Deposit Market Share Report, LCNB ranked 25<sup>th</sup> out of 40 deposit market competitors. The market is dominated by large financial institutions. The top five financial institutions in deposit market share are The Huntington National Bank, JPMorgan Chase Bank, N.A., PNC Bank, N.A., Fifth Third Bank, N.A., and Bank of America, N.A. These financial institutions hold 87.1 percent of total deposits in the AA.

Less than 10 percent of LCNB's home mortgage lending occurs in the Columbus MSA AA. Based on the 2020 Peer Mortgage Data, LCNB has 0.08 percent of the market share for home mortgages, lending \$33.3 million and ranking 128<sup>th</sup> among 571 market participants. The market is dominated by large banks and banks with large secondary mortgage market operations. The top five institutions for home mortgage lending are The Huntington National Bank, Union Savings Bank, JPMorgan Chase Bank,

N.A., Quicken Loans, LLC, and U.S. Bank N.A. Combined these five financial institutions have 26.6 percent of the total market share.

There were no farm loans in the Columbus MSA AA during the evaluation period. However, approximately 18 percent of the bank's small business lending occurred in this AA during the evaluation period. Competition for loans is strong. According to the 2020 Peer Small Business Data, 201 lenders originated or purchased small business loans in the AA. The top five institutions for small business lending are JPMorgan Chase Bank, N.A., The Huntington National Bank, U.S. Bank N.A., PNC Bank N.A., and Fifth Third Bank, N.A. The top five competitors hold 70.1 percent of the market share, while LCNB holds 0.31 percent, ranking 24<sup>th</sup> out of 201 lenders. According to the D&B data as of June 2021, 83.9 percent of the businesses located in the AA have gross annual revenues of \$1 million or less and 66.5 percent have fewer than five employees.

Four community contacts were performed with community service organizations that serve the Columbus MSA AA. The contacts discussed the need for support for financial literacy, utility assistance and food, and general operating support for community service organizations. In terms of specific lending needs, the contacts mentioned affordable housing as a need in the community, as well as support for homeownership counseling. Overall, local financial institutions are adequately meeting the credit and CD needs of the community.

### Dayton MSA AA

<b>Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Dayton MSA AA 2019 – 2021</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	153	15.7	23.5	41.2	19.0	0.7
Population by Geography	533,763	12.8	21.5	46.2	19.4	0.0
Housing Units by Geography	254,415	15.6	23.0	44.2	17.1	0.0
Owner-Occupied Units by Geography	135,689	8.5	18.1	49.8	23.6	0.0
Occupied Rental Units by Geography	86,998	20.2	27.8	41.9	10.1	0.0
Vacant Units by Geography	31,728	33.6	30.6	26.9	8.8	0.0
Businesses by Geography	35,108	10.2	19.8	47.3	22.7	0.0
Farms by Geography	904	5.6	17.0	56.6	20.7	0.0
Family Distribution by Income Level	133,872	25.5	17.8	19.6	37.1	0.0
Household Distribution by Income Level	222,687	27.2	16.7	17.4	38.7	0.0
Median Family Income MSA - 19430 Dayton-Kettering, OH MSA		\$61,957	Median Housing Value			\$109,005
			Median Gross Rent			\$730
			Families Below Poverty Level			14.5%

*Source: 2015 ACS and 2021 D&B Data.*

*Due to rounding, totals may not equal 100.0%.*

*(\*) The NA category consists of geographies that have not been assigned an income classification.*

The Dayton MSA AA includes Montgomery County. There were no changes to the Dayton MSA AA during the evaluation period. As of December 31, 2021, LCNB had three branches with an ATM at each branch in this AA. The Brookville Branch is in a middle-income CT while the Centerville and Oakwood Branches are in upper-income CTs.

Based on the bank's AA and U.S. Census data in the above table, the population in Montgomery County, Ohio, slightly declined by approximately 0.3 percent, from 2010 to 2015, while the state of Ohio population increased about 1 percent. According to the 2015 ACS U.S. Census, the AA consists of 153 CTs, and is comprised of 24 low-income, 36 moderate-income, 63 middle-income, 29 upper-income, and one CT in which the geography has not been assigned any income classification.

The economic conditions in the Dayton MSA AA have improved since the start of the COVID-19 pandemic. However, according to Moody's Analytics, Dayton's recovery is lagging the rest of Ohio and the nation. For 2020, COVID-19 was challenging to the economy with higher-than-normal unemployment rates. According to the U.S. Bureau of Labor Statistics as of December 2021, the not seasonally adjusted unemployment rate in Montgomery County was 3.6, which is the same as the statewide rate of 3.6 percent.

The economy in the Dayton MSA AA is generally diversified with little dependency on one industry. According to Moody's Analytics, top industries include trade, government, professional and business services, education and health services, leisure and hospitality, and manufacturing. Top employers in the area include Wright-Patterson Air Force Base, Premiere Health Partners, Kettering Health Network, Kroger Co., Miami University, and Dayton Children's Hospital.

According to the 2015 ACS U.S. Census, the median housing value of owner-occupied housing units is \$109,005. With median family income of \$61,957, moderate-income families make less than \$49,566 and low-income families make less than \$30,979 annually. Median housing values are at least 2.2 times the annual income of moderate-income families and 3.5 times the annual income of low-income families. Thus, the cost of housing is a barrier to homeownership among LMI families. As of the 2015 ACS U.S. Census, there are 254,415 total housing units in the Dayton MSA AA, of which 53.3 percent are owner-occupied, 34.2 percent are rental occupied, and 12.5 percent are vacant units. Families living below the poverty level was 14.5 percent as referenced in the table above. The median age of housing stock is approximately 58 years. The cost of homeownership in older housing is typically higher than in newer housing; thus, the median age of housing in LMI geographies is also a significant barrier to mortgage lending in those CTs.

Competition for deposits in the AA is strong. As of the June 30, 2021, FDIC Deposit Market Share Report, LCNB held \$160.6 million or 1.34 percent of the deposits inside this market area. This represents 10.2 percent of LCNB's total deposits. As of the June 30, 2021, FDIC Deposit Market Share Report, LCNB ranked 10th out of 20 deposit market competitors. The market is dominated by large financial institutions. The top five financial institutions in deposit market share are Fifth Third Bank, N.A., JPMorgan Chase Bank, N.A., PNC Bank, N.A., Keybank, N.A., and The Huntington National Bank. These financial institutions hold 81.7 percent of total deposits in the AA.

Approximately 8.2 percent of LCNB's home mortgage lending occurs in the Dayton MSA AA. Based on the 2020 Peer Mortgage Data, LCNB has 0.19 percent of the market share for home mortgages, lending \$8.4 million and ranking 68<sup>th</sup> among 412 market participants. The market is dominated by large banks and banks with large secondary mortgage market operations. The top five institutions for home mortgage lending are Union Savings Bank, Wright-Patt Credit Union, Inc., Fifth Third Bank, N.A., Quicken Loans, LLC, and U.S. Bank N.A. Combined these five financial institutions have 34.3 percent of the total market share.

Very little farm lending occurs in this AA. Approximately 12.1 percent of the small business lending occurs in this AA. Competition for loans is strong. According to the 2020 Peer Small Business Data, 115 lenders originated or purchased small business loans in the AA. The top five institutions for small business lending are PNC Bank, N.A., U.S. Bank N.A., Fifth Third Bank, N.A., JPMorgan Chase Bank, N.A., and The Huntington National Bank. The top five competitors hold 64.9 percent of the market share, while LCNB holds 0.66 percent, ranking 16<sup>th</sup> out of 115 lenders. According to the D&B data as of June 2021, 81.7 percent of the businesses located in the AA have gross annual revenues of \$1 million or less and 65.9 percent have fewer than five employees.

One community contact was conducted with a community service organization that serves the Dayton MSA AA. The contact mentioned that access to capital for small businesses was a need in the community. Overall, local financial institutions are adequately meeting the credit and CD needs of the community.

#### Non-MSA AA

<b>Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Non-MSA AA 2019 - 2021</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	45	0.0	22.2	64.4	13.3	0.0
Population by Geography	189,677	0.0	22.0	64.3	13.7	0.0
Housing Units by Geography	80,499	0.0	23.3	63.6	13.0	0.0
Owner-Occupied Units by Geography	49,967	0.0	18.1	66.1	15.9	0.0
Occupied Rental Units by Geography	22,088	0.0	34.3	57.7	7.9	0.0
Vacant Units by Geography	8,444	0.0	25.7	64.7	9.6	0.0
Businesses by Geography	9,218	0.0	33.9	54.7	11.4	0.0
Farms by Geography	856	0.0	13.4	72.2	14.4	0.0
Family Distribution by Income Level	49,786	21.7	19.0	20.9	38.4	0.0
Household Distribution by Income Level	72,055	23.2	17.0	18.6	41.2	0.0
Median Family Income Non-MSAs - OH		\$55,785	Median Housing Value			\$112,104
			Median Gross Rent			\$686
			Families Below Poverty Level			13.0%

*Source: 2015 ACS and 2021 D&B Data.*

*Due to rounding, totals may not equal 100.0%.*

*(\*) The NA category consists of geographies that have not been assigned an income classification.*

The Non-MSA AA includes Clinton, Fayette, Preble, and Ross Counties. There were no changes to the Non-MSA AA during the evaluation period. As of December 31, 2021, LCNB had nine branches with an ATM at each branch. Both Eaton branches and two of the Chillicothe branches are in moderate-income CTs, the Frankfort, Lewisburg, Washington Court House, and Wilmington Branches are in middle-income CTs, and the Chillicothe Branch on Western Avenue is in an upper-income CT.

Based on the bank's AA and U.S. Census data in the above table, the population in the Non-MSA AA declined by approximately 0.9 percent, from 2010 to 2015, while the state of Ohio population increased about 1 percent. According to the 2015 ACS U.S. Census, the AA consists of 45 CTs, and is comprised of 10 moderate-income, 29 middle-income, and six upper-income CTs.

The economic conditions in the Non-MSA AA have improved since the start of the COVID-19 pandemic and are overall stable. For 2020, COVID-19 was challenging to the economy with higher-than-normal unemployment rates. According to the U.S. Bureau of Labor Statistics as of December 2021, not seasonally adjusted unemployment rates in Clinton, Fayette, Preble, and Ross Counties were 3.6 percent, 3.1 percent, 2.9 percent, and 3.6 percent, respectively. These unemployment rates compare reasonably to the statewide rate of 3.6 percent.

The AA has a relatively diverse employer base with many industries including manufacturing, transportation and warehousing, health care and social assistance, retail trade, and educational services. Top employers in Clinton County include R&L Carriers, Ahresty Wilmington Corp., and American Showa. Large employers in Fayette County include Cargill, Inc., Domtar Paper Co., and Fayette County Memorial Hospital. Primary employers in Preble County include Neaton Auto Products Manufacturing, Inc. and Henny Penny. Large employers in Ross County include Kenworth Truck Company, Pixelle Specialty Products, and YSK Corporation.

According to the 2015 ACS U.S. Census, the median housing value of owner-occupied housing units is \$112,104. With median family income of \$55,785, moderate-income families make less than \$44,628 and low-income families make less than \$27,893 annually. Median housing values are at least 2.5 times the annual income of moderate-income families and 4.0 times the annual income of low-income families. Thus, the cost of housing is a significant barrier to homeownership among LMI families. As of the 2015 ACS U.S. Census, there are 80,499 total housing units in the Non-MSA AA, of which 62.1 percent are owner-occupied, 27.4 percent are rental occupied, and 10.5 percent are vacant units. Families living below the poverty level was 13 percent as referenced in the table above. The median age of housing stock is approximately 50 years. The cost of homeownership in older housing is typically higher than in newer housing; thus, the median age of housing in LMI geographies is also a significant barrier to mortgage lending in those CTs.

Competition for deposits in the AA is strong. As of the June 30, 2021, FDIC Deposit Market Share Report, LCNB held \$371.3 million or 11.2 percent of the deposits inside this market area. This represents 23.5 percent of LCNB's total deposits. As of the June 30, 2021, FDIC Deposit Market Share Report, LCNB ranked first out of 22 deposit market competitors. The market is dominated by large financial institutions and other community banks. The top four financial institutions, behind LCNB, in

deposit market share are Fifth Third Bank, N.A., The Huntington National Bank, Kingston National Bank, and Peoples Bank. These four financial institutions hold 37.2 percent of total deposits in the AA.

Approximately 28.6 percent of LCNB's home mortgage lending occurs in the Non-MSA AA. Based on the 2020 Peer Mortgage Data, LCNB has 2.8 percent of the market share for home mortgages, lending \$23.9 million and ranking 8<sup>th</sup> among 284 market participants. The market is dominated by large banks. The top five institutions for home mortgage lending are The Huntington National Bank, Fifth Third Bank, N.A., U.S Bank N.A., Quicken Loans, LLC, and Merchants National Bank. Combined these five financial institutions have 22.5 percent of the total market share.

Almost 73 percent of LCNB's farm lending occurs in this AA. According to the 2020 Peer Small Farm Data, 21 lenders originated or purchased small farm loans in the AA. The top five institutions for small farm lending are LCNB, Peoples Bank, Merchants Bank of Indiana, The Huntington National Bank, and U.S. Bank, N.A. The top four competitors, other than LCNB, hold 42.4 percent of the market share, while LCNB holds 29.3 percent, ranking first out of 21 lenders. According to the D&B data as of June 2021, 98.1 percent of the farms located in the AA have gross annual revenues of \$1 million or less.

Almost 20 percent of the small business lending occurs in this AA. Competition for loans is strong. According to the 2020 Peer Small Business Data, 81 lenders originated or purchased small business loans in the AA. The top five institutions for small business lending are The Huntington National Bank, U.S. Bank, N.A., Fifth Third Bank, N.A., PNC Bank, N.A., and American Express National Bank. The top five competitors hold 55.6 percent of the market share, while LCNB holds 5.8 percent, ranking ninth out of 81 lenders. According to the D&B data as of June 2021, 78.4 percent of the businesses located in the AA have gross annual revenues of \$1 million or less and 67.1 percent have fewer than five employees.

Five community contacts were conducted with community service organizations that serve the Non-MSA AA. The contacts mentioned financial education, funds for emergency shelters and services, low-cost rehabilitation financing, funds for the food pantries, and general operating support for community organizations as needs in the community. Specific to credit needs, the contacts mentioned affordable housing and SBA loans as credit needs in the AA. Overall, local financial institutions are adequately meeting the credit and CD needs of the community.

## **Scope of Evaluation in Ohio**

LCNB was evaluated using the large bank CRA examination procedures to assess the bank's record of meeting the credit and CD needs of its AAs. Large bank procedures include a Lending Test, Investment Test, and Service Test.

For the Lending Test, the OCC evaluated home mortgage loans reported under the HMDA and small loans to businesses and farms reported under the CRA. The evaluation period is January 1, 2019, to December 31, 2021. Under the Lending Test, the OCC performed separate analyses of the 2019 through 2020 data and 2021 data due to a change in the Cincinnati MMSA AA and Columbus MSA AA in 2021 to include whole counties in the AAs. LCNB did not change its lending strategy during the two analysis periods.

The OCC completed full-scope reviews for each AA. Greater weight was given to the performance in the Cincinnati MMSA AA since the majority of the bank's operations are located in that AA. See appendix A for a list of AAs under review.

## Conclusions in Respect to Performance Tests in Ohio

### Lending Test

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

### Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the full-scope AAs is good.

### Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Cincinnati MMSA AA	813	694	36	18	1,561	50.8	59.1
Columbus MSA AA	145	247	0	14	406	13.2	7.2
Dayton MSA AA	125	166	3	2	296	9.6	10.2
Non-MSA AA	434	269	105	2	810	26.4	23.5
Regional Area – No Purpose, Mandate, Function	NA	NA	NA	7	7	NA	NA
<b>Total</b>	<b>1,517</b>	<b>1,376</b>	<b>144</b>	<b>43</b>	<b>3,080</b>	<b>100.0</b>	<b>100.0</b>

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State*	% State Deposits
Cincinnati MMSA AA	215,486	95,580	4,853	34,583	350,502	48.1	59.1
Columbus MSA AA	114,004	66,914	0	34,947	215,865	29.6	7.2
Dayton MSA AA	23,543	29,254	329	356	53,482	7.3	10.2
Non-MSA AA	58,136	31,860	17,777	1,655	109,428	15.0	23.5

Regional Area – No Purpose, Mandate, Function	NA	NA	NA	5,841	5,841	NA	NA
<b>Total</b>	<b>411,169</b>	<b>223,608</b>	<b>22,959</b>	<b>77,382</b>	<b>735,118</b>	<b>100.0</b>	<b>100.0</b>

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

In drawing the overall conclusion, the OCC considered the bank’s lending strategy focus, and the fact that there are considerably more lenders originating or purchasing loans in the AAs than there are depository institutions with branch offices. Lenders include local and non-local depository institutions, as well as non-bank financial institutions.

### Cincinnati MMSA AA

Lending levels in the Cincinnati MMSA AA reflect good responsiveness to AA credit needs. During the evaluation period, LCNB originated 813 home mortgage loans totaling \$215.5 million and 694 small business loans totaling \$95.6 million. Based on the FDIC Deposit Market Share Report from June 30, 2021, there were 46 deposit-taking institutions with one or more banking offices in the AA. The bank ranked 10th with a deposit market share of 0.64 percent, which is equivalent to the top 22 percent of banks in the AA.

Given the competition from other reporting lenders in the AA, LCNB’s lending market share is good compared to its deposit market share in the AA. Aggregate home mortgage data for 2020 indicates the bank’s 0.44 percent market share ranked 50<sup>th</sup> among 564 lenders that reported home mortgage loans. This ranking is the equivalent to the top 9 percent of lenders in the AA. The top five institutions have a combined market share of 27.7 percent and are larger regional banks or mortgage lending businesses. Aggregate business lending data for 2020 shows the bank’s 0.64 percent market share ranked 18<sup>th</sup> among 186 lenders that reported business loans. This ranking is the equivalent to the top 10 percent of reporting lenders in the AA. The top five business lenders are large banks which account for 69.2 percent of the market.

### Columbus MSA AA

Lending levels in the Columbus MSA AA reflect good responsiveness to AA credit needs. During the evaluation period, LCNB originated 145 home mortgage loans totaling \$114.0 million and 247 small business loans totaling \$66.9 million. Based on the FDIC Deposit Market Share Report from June 30, 2021, there were 40 deposit-taking institutions with one or more banking offices in the AA. The bank ranked 25<sup>th</sup> with a deposit market share of 0.13 percent, which is equivalent to the top 63 percent of banks in the AA.

Given the competition from other reporting lenders in the AA, LCNB’s lending market share is good compared to its deposit market share in the AA. Aggregate home mortgage data for 2020 indicates the bank’s 0.08 percent market share ranked 128<sup>th</sup> among 571 lenders that reported home mortgage loans. This ranking is the equivalent to the top 22 percent of lenders in the AA. The top five institutions have a combined market share of 26.6 percent and are larger regional banks or mortgage lending businesses. Aggregate business lending data for 2020 shows the bank’s 0.31 percent market share ranked 24<sup>th</sup> among 201 lenders that reported business loans. This ranking is the equivalent to the top 12 percent of

reporting lenders in the AA. The top five business lenders are large banks which account for 70.1 percent of the market.

#### Dayton MSA AA

Lending levels in the Dayton MSA AA reflects adequate responsiveness to AA credit needs. During the evaluation period, LCNB originated 125 home mortgage loans totaling \$23.5 million and 166 small business loans totaling \$29.3 million. Based on the FDIC Deposit Market Share Report from June 30, 2021, there were 20 deposit-taking institutions with one or more banking offices in the AA. The bank ranked 10<sup>th</sup> with a deposit market share of 1.3 percent, which is equivalent to the top 50 percent of banks in the AA.

Given the competition from other reporting lenders in the AA, LCNB's lending market share is good compared to its deposit market share in the AA. Aggregate home mortgage data for 2020 indicates the bank's 0.19 percent market share ranked 68<sup>th</sup> among 412 lenders that reported home mortgage loans. This ranking is the equivalent to the top 17 percent of lenders in the AA. The top five institutions have a combined market share of 34.3 percent and are larger regional banks, credit unions, or mortgage lending businesses. Aggregate business lending data for 2020 shows the bank's 0.66 percent market share ranked 16<sup>th</sup> among 115 lenders that reported business loans. This ranking is the equivalent to the top 14 percent of reporting lenders in the AA. The top five business lenders are large banks which account for 64.9 percent of the market.

#### Non-MSA AA

Lending levels in the Non-MSA AA reflect good responsiveness to AA credit needs. During the evaluation period, LCNB originated 434 home mortgage loans totaling \$58.1 million, 269 small business loans totaling \$31.9 million, and 105 small farm loans totaling \$17.8 million. Based on the FDIC Deposit Market Share Report from June 30, 2021, there were 22 deposit-taking institutions with one or more banking offices in the AA. The bank ranked first with a deposit market share of 11.2 percent.

Given the competition from other reporting lenders in the AA, LCNB's lending market share is good compared to its deposit market share in the AA. Aggregate home mortgage data for 2020 indicates the bank's 2.8 percent market share ranked 8<sup>th</sup> among 284 lenders that reported home mortgage loans. This ranking is the equivalent to the top 3 percent of lenders in the AA. The top five institutions have a combined market share of 22.5 percent and are larger regional banks or mortgage lending businesses. Aggregate business lending data for 2020 shows the bank's 5.8 percent market share ranked ninth among 81 lenders that reported business loans. This ranking is the equivalent to the top 11 percent of reporting lenders in the AA. The top five business lenders are large banks which account for 55.6 percent of the market. Aggregate farm lending data for 2020 shows the bank's 29.3 percent market share ranked first among 21 lenders that reported farm loans. The top five farm lenders account for 71.7 percent of the market.

### **Distribution of Loans by Income Level of the Geography**

The bank exhibits an adequate geographic distribution of loans in its AAs.

## *Home Mortgage Loans*

The bank's geographic distribution of home mortgage loans is adequate.

Refer to Table O in the state of Ohio 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 OCC compared the percentage of home mortgage loans originated or purchased by the bank to the percentage of owner-occupied housing units (demographic data) in the four geographic income categories, placing emphasis on the LMI geographies. The OCC also compared the bank's performance against the percentage of home mortgage loans of other mortgage lenders (aggregate data) in the AA, as demonstrated by HMDA aggregate data.

In determining the ratings, the OCC weighed demographic factors of the AA that could affect the bank's ability to lend. These factors include competition from larger institutions, the number of LMI geographies, branch presence, area demographics, and the location of most owner-occupied housing.

### Cincinnati MMSA AA

The geographic distribution of home mortgage loans in the Cincinnati MMSA AA is adequate.

The OCC considered that better lending opportunities exist in middle- and upper-income CTs within the AA. According to the 2015 ACS U.S. Census, LMI CTs contained only 19.2 percent of owner-occupied housing units in the bank's 2021 Cincinnati MMSA AA. And while single family homes comprise 62 percent in low-income CTs and 75.4 percent in moderate-income CTs of the total housing units, only 21.3 percent in low-income CTs and 43.6 percent in moderate-income CTs are owner-occupied. In low-income CTs, this represents only 10,153 housing units, which affects the bank's lending opportunities due to the level of competition in the AA.

During 2019 and 2020, the proportion of LCNB's home mortgage loans in low-income CTs at 1 percent is below both the percentage of owner-occupied housing units (demographic data) of 4.4 percent and the aggregate home mortgage lending percentage (aggregate data) of 2.4 percent. The proportion of the bank's home mortgage lending in moderate-income CTs at 5.2 percent is well below the demographic data of 14.1 percent and below the aggregate data of 9.7 percent.

In 2021, the proportion of LCNB's home mortgage loans in low-income CTs at 3.8 percent is near to the demographic data of 4.1 percent and exceeds the aggregate data of 2.5 percent. The proportion of the bank's home mortgage lending in moderate-income CTs at 9.3 percent is below the demographic data of 15.1 percent but near the aggregate data of 11.2 percent.

The majority of LCNB's branches are in Warren County, while the southwestern part of the AA (Hamilton County) contains a significant number of the AA's LMI CTs. The bank had two branches in Hamilton County during the evaluation period, with one branch closing in February 2022. This leads to a competitive disadvantage with several large financial institutions located there and demonstrates the effect competition and limited owner-occupied housing have on the bank's ability to originate residential mortgages within LMI CTs in the AA.

Columbus MSA AA

The geographic distribution of home mortgage loans in the Columbus MSA AA is excellent.

The OCC considered that better lending opportunities exist in middle- and upper-income CTs within the AA. According to the 2015 ACS U.S. Census, LMI CTs contained only 25.3 percent of owner-occupied housing units in the bank's 2021 Columbus MSA AA. And while single family homes comprise approximately 70 percent of housing units in both low- and moderate-income CTs, only 22.6 percent in low-income CTs and 40.9 percent in moderate-income CTs are owner-occupied. In low-income CTs, this represents only 13,938 housing units, which affects the bank's lending opportunities due to the level of competition in the AA.

During 2019 and 2020, the proportion of LCNB's home mortgage loans in low-income CTs at 17.5 percent significantly exceeds both the demographic data of 6.6 percent and the aggregate data of 5 percent. The proportion of the bank's home mortgage lending in moderate-income CTs at 15.5 percent is below the demographic data of 19.7 percent but exceeds the aggregate data of 14.6 percent.

In 2021, the proportion of LCNB's home mortgage loans in low-income CTs at 6.3 percent is near to the demographic data of 6.4 percent and exceeds the aggregate data of 4.7 percent. The proportion of the bank's home mortgage lending in moderate-income CTs at 14.6 percent is below the demographic data of 18.9 percent but exceeds the aggregate data of 13.9 percent.

Dayton MSA AA

The geographic distribution of home mortgage loans in the Dayton MSA AA is adequate.

The OCC considered that better lending opportunities exist in middle- and upper-income CTs within the AA. According to the 2015 ACS U.S. Census, LMI CTs contained only 26.6 percent of owner-occupied housing units. And while single family homes comprise 80.7 percent in low-income CTs and 76.9 percent in moderate-income CTs of total housing units, only 29 percent in low-income CTs and 42 percent in moderate-income CTs are owner-occupied. In low-income CTs, this represents only 9,295 housing units, which affects the bank's lending opportunities due to the level of competition in the AA.

The proportion of LCNB's home mortgage loans in low-income CTs at 3.2 percent is below the demographic data of 8.5 percent and exceeds the aggregate data of 3 percent. The proportion of the bank's home mortgage lending in moderate-income CTs at 3.2 percent is significantly below both the demographic data of 18.1 percent and the aggregate data of 12.6 percent.

None of LCNB's three branches in Montgomery County are near to the AAs' LMI CTs, which are mostly in the Dayton downtown area. Significant competition for loans exists mainly from larger, regional banks.

Non-MSA AA

The geographic distribution of home mortgage loans in the Non-MSA AA is overall adequate.

The OCC considered that the AA contains no low-income CTs and moderate-income CTs contain only 18.1 percent of the owner-occupied housing units in the AA. And while single family homes comprise

83.4 percent of housing units in moderate-income CTs, only 48.1 percent in moderate-income CTs are owner-occupied. This represents only 7,536 housing units, which affects the bank's lending opportunities due to the level of competition in the AA. Four of the bank's nine branches in the AA are in moderate-income CTs. Additionally, the median age of housing stock in this AA is approximately 50 years, with the median age of housing in moderate-income CTs at 55 years. The cost of homeownership in older housing is typically higher than in newer housing; thus, the median age of housing in the LMI geographies is also a significant barrier to mortgage lending in those CTs.

The proportion of LCNB's home mortgage loans in moderate-income CTs at 10.4 percent is well below the demographic data of 18.1 percent and below the aggregate data of 16.9 percent, but is overall considered adequate.

### ***Small Loans to Businesses***

The bank's geographic distribution of small loans to businesses is good.

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

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

In determining the conclusions, the OCC gave consideration for opportunities to lend based on the number of CTs in each income level, the level of competition, and the number of non-farm businesses located in LMI CTs within each AA.

### **Cincinnati MMSA AA**

LCNB's distribution of small loans to businesses in the Cincinnati MMSA AA is good. In the analysis, the OCC considered that better lending opportunities exist in middle- and upper-income CTs within the AA. According to 2021 D&B data, LMI CTs contained 25.4 percent of businesses in the AA.

During 2019 and 2020, the proportion of LCNB's small loans to businesses in low-income CTs at 3.4 percent is well below both the percentage of businesses (demographic data) of 8.3 percent and the aggregate small loans to business lending percentage (aggregate data) of 7.5 percent. The proportion of the bank's small loans to businesses in moderate-income CTs at 20.6 percent exceeds both the demographic data of 14.8 percent and aggregate data of 13.3 percent.

In 2021, the proportion of LCNB's small loans to businesses in low-income CTs at 3.2 percent is below both the demographic data of 7.4 percent and the aggregate data of 7 percent. The proportion of the bank's small loans to businesses in moderate-income CTs at 19.2 percent exceeds both the demographic data of 18 percent and the aggregate data of 16.8 percent.

Columbus MSA AA

LCNB's distribution of small loans to businesses in the Columbus MSA AA is good. In the analysis, the OCC considered that better lending opportunities exist in middle- and upper-income CTs within the AA. According to 2021 D&B data, LMI CTs contained 28.2 percent of businesses in the AA.

During 2019 and 2020, the proportion of LCNB's small loans to businesses in low-income CTs at 9.2 percent is near to the percentage of businesses of 10.7 percent and exceeds the aggregate data of 8.9 percent. The proportion of the bank's small loans to businesses in moderate-income CTs at 11.6 percent is below both the percentage of businesses of 18.1 percent and aggregate data of 15.3 percent.

In 2021, the proportion of LCNB's small loans to businesses in low-income CTs at 10.8 percent exceeds the percentage of businesses of 10.4 percent and aggregate data of 8.7 percent. The proportion of the bank's small loans to businesses in moderate-income CTs at 12.2 percent is below the percentage of businesses of 17.8 percent but near the aggregate data of 14.8 percent.

Dayton MSA AA

LCNB's distribution of small loans to businesses in the Dayton MSA AA is adequate. In the analysis, the OCC considered that better lending opportunities exist in middle- and upper-income CTs within the AA. According to 2021 D&B data, LMI CTs contained 30 percent of businesses in the AA.

The proportion of LCNB's small loans to businesses in low-income CTs at 2.4 percent is significantly below both the percentage of businesses of 10.2 percent and the aggregate data of 9.5 percent. However, the proportion of the bank's small loans to businesses in moderate-income CTs at 20.5 percent exceeds both the percentage of businesses of 19.8 percent and aggregate data of 18.9 percent.

None of LCNB's three branches in Montgomery County are near to the AAs' LMI CTs, which are mostly in the Dayton downtown area. Significant competition for loan exists mainly from larger, regional banks.

Non-MSA AA

LCNB's distribution of small loans to businesses in the Non-MSA AA is good. We considered that the AA contains no low-income CTs and moderate-income CTs contain 33.9 percent of the businesses in the AA.

The proportion of the bank's small loans to businesses in moderate-income CTs at 30.5 percent is below the percentage of businesses of 33.9 percent and just slightly below the aggregate data of 30.8 percent.

***Small Loans to Farms***

The bank's geographic distribution of small loans to farms is adequate. However, as this is not a primary product for the bank and due to limited lending volume, small farm lending has a neutral impact on the overall geographic rating.

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

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

In determining the conclusions, the OCC gave consideration for opportunities to lend based on the number of CTs in each income level, the level of competition, and the number of farms located in LMI CTs within each AA.

#### Cincinnati MMSA AA

LCNB's distribution of small loans to farms in the Cincinnati MMSA AA is poor. In the analysis, the OCC considered that this AA is largely urban or suburban, limiting opportunities for farm lending. According to 2020 and 2021 D&B data, LMI CTs contained only 252 farms in 2019-2020 and 527 farms in 2021.

During 2019 and 2020, LCNB did not originate any small loans to farms in LMI CTs. In 2021, the bank did not make a sufficient volume of small loans to farms to allow for meaningful quantitative analysis. However, farm lending is not a primary product in the Cincinnati MMSA AA.

#### Columbus MSA AA

LCNB's origination volume of farm loans in the Columbus MSA AA were not sufficient to allow for meaningful quantitative analysis. As a result, farm loans in this AA were not included in the evaluation. This AA is largely urban or suburban, limiting opportunities for farm lending.

#### Dayton MSA AA

LCNB's origination volume of farm loans in the Dayton MSA AA were not sufficient to allow for meaningful quantitative analysis. As a result, farm loans in this AA were not included in the evaluation. This AA is largely urban or suburban, limiting opportunities for farm lending.

#### Non-MSA AA

LCNB's distribution of small loans to farms in the Non-MSA AA is excellent. In the analysis, the OCC considered that this AA has no low-income CTs, limiting opportunities for farm lending. According to 2020 D&B data, moderate-income CTs contained only 115 farms during the evaluation period.

The proportion of the bank's small loans to farms in moderate-income CTs at 10.5 percent is near to the percentage of farms of 13.4 percent and significantly exceeds the aggregate small loans to farms lending percentage (aggregate data) of 5.8 percent. As noted above, LCNB is ranked first out of 21 lenders in small loans to farms as of the 2020 Peer Small Farm Data in the Non-MSA AA, with LCNB holding 29.3 percent of the total market share. A majority of the bank's farm lending is in the Non-MSA AA.

### ***Lending Gap Analysis***

The OCC evaluated the lending distribution in the full-scope AAs to determine if any unexplained, conspicuous gaps existed. The OCC reviewed summary reports, maps, and analyzed the bank's lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. The OCC did not identify any unexplained, conspicuous gaps.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibits a good distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the institution.

### ***Home Mortgage Loans***

LCNB's distribution of home mortgage loans among borrowers of different income levels is excellent.

Refer to Table P in the state of Ohio 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 OCC compared the percentage of home mortgage loans originated or purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level (demographic data), placing emphasis on lending to LMI families. The OCC also compared the bank's performance against home mortgage loans of other home mortgage lenders (aggregate data), as demonstrated by HMDA aggregate data.

In evaluating the borrower distribution of home mortgage loans, the OCC considered the level of competition and its effect on limiting the bank's ability to lend to borrowers of different incomes, as well as the economic conditions in the AAs. The OCC also considered the percentage of families that live below the poverty level, and the barriers this creates for these families to qualify for home mortgage financing.

### **Cincinnati MMSA AA**

LCNB's distribution of home mortgage loans among borrowers of different income levels throughout the Cincinnati MMSA AA is excellent.

For 2019 and 2020, the proportion of the bank's home mortgage loans to low-income borrowers at 8 percent exceeds the aggregate lending percentage of 7 percent. Though the bank's percentage of home mortgage loans is significantly below the 21.2 percent of low-income families in the AA (demographic data), the bank's level of lending in comparison to the demographic comparator is reasonable given that 9.8 percent of the families in the AA are living below the poverty level. The bank's proportion of home mortgage lending to moderate-income borrowers at 18.5 percent exceeds both demographic data of 16 percent and the aggregate data of 16.2 percent.

In 2021 the bank's proportion of home mortgage loans to low-income borrowers at 6.2 percent is near the aggregate data of 6.7 percent and significantly below the 22.3 percent of low-income families in the AA. Given that the poverty level is 10.5 percent, LCNB's level of lending to low-income borrowers is

reasonable. The bank's proportion of loans to moderate-income borrowers at 15.2 percent is near to both the demographic data of 16.1 percent and aggregate data of 15.9 percent.

#### Columbus MSA AA

LCNB's distribution of home mortgage loans among borrowers of different income levels throughout the Columbus MSA AA is poor.

For 2019 and 2020, the proportion of the bank's home mortgage loans to low-income borrowers at 1 percent is below the aggregate data of 6.6 percent. And both the bank and aggregate percentages of home mortgage loans are significantly below the 22.9 percent of low-income families in the AA. The bank's proportion of home mortgage lending to moderate-income borrowers at 2.1 percent is significantly below both the percentage of moderate-income families in the AA at 16.7 percent and the aggregate data of 16.3 percent.

In 2021 the bank's proportion of home mortgage loans to low-income borrowers at 8.3 percent exceeds the aggregate lending percentage of 6.4 percent and is significantly below the 22.5 percent of low-income families in the AA. Given that the poverty level is 11.3 percent, LCNB's level of lending to low-income borrowers is reasonable. The bank did not make any loans to moderate-income borrowers during 2021. Per the bank's HMDA data, 52.1 percent of loans originated did not have income reported. This is due to the significant number of investment property loans secured by 1-4 family homes.

#### Dayton MSA AA

LCNB's distribution of home mortgage loans among borrowers of different income levels throughout the Dayton MSA AA is excellent.

The proportion of the bank's home mortgage loans to low-income borrowers at 13.6 percent exceeds the aggregate data of 8.2 percent. Though the bank's percentage of home mortgage loans is significantly below the 25.5 percent of low-income families in the AA, the bank's level of lending in comparison to the demographic comparator is reasonable given that 14.5 percent of the families in the AA are living below the poverty level. The bank's proportion of home mortgage lending to moderate-income borrowers at 20 percent exceeds both demographic data of 17.8 percent and aggregate data of 19 percent.

#### Non-MSA AA

LCNB's distribution of home mortgage loans among borrowers of different income levels throughout the Non-MSA AA is excellent.

The proportion of the bank's home mortgage loans to low-income borrowers at 7.8 percent exceeds the aggregate lending percentage of 5.2 percent. Though the bank's percentage of home mortgage loans is significantly below the 21.7 percent of low-income families in the AA, the bank's level of lending in comparison to the demographic comparator is reasonable given that 13 percent of the families in the AA are living below the poverty level. The bank's proportion of home mortgage lending to moderate-income borrowers at 18.9 percent is near to the percentage of moderate-income families in the AA at 19 percent and exceeds the aggregate lending data of 17 percent.

***Small Loans to Businesses***

LCNB's borrower distribution of small loans to businesses of different sizes is adequate.

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

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

In evaluating the borrower distribution of loans to businesses of different sizes, the OCC considered the level of competition and its effect on limiting the bank's ability to lend, as well as the economic conditions in the AA.

**Cincinnati MMSA AA**

LCNB's borrower distribution of small loans to small businesses in the Cincinnati MMSA AA is adequate.

During 2019 and 2020, the bank originated 43.1 percent of its small loans to businesses with revenues of \$1 million or less. In comparison, the bank's percentage is below the percentage of businesses with revenues of \$1 million or less (demographic data) at 83.7 percent but is near the aggregate lending percentage of small loans to businesses (aggregate data) of 43.8 percent. In 2021, the bank originated 21.7 percent of its small loans to businesses with revenues of \$1 million or less, which is significantly below the percentage of businesses with revenues of \$1 million or less at 82.1 percent and the aggregate lending percentage of small loans to businesses of 43.5 percent. However, the bank's lending to borrowers with gross revenues not available were 64.8 percent. The majority of the loans to businesses without revenues available were SBA PPP loans.

**Columbus MSA AA**

LCNB's borrower distribution of small loans to small businesses in the Columbus MSA AA is adequate.

During 2019 and 2020, the bank originated 45.1 percent of its small loans to businesses with revenues of \$1 million or less. In comparison, the bank's percentage is below the percentage of businesses with revenues of \$1 million or less at 83.8 percent but exceeds the aggregate lending percentage of small loans to small businesses of 41.7 percent. In 2021, the bank originated 36.5 percent of its small loans to businesses with revenues of \$1 million or less, which is below the percentage of businesses with revenues of \$1 million or less at 83.9 percent and below the aggregate lending percentage of small loans to small businesses of 41.9 percent. The OCC noted that 25.7 percent of the loans were to businesses with income not available, with the majority being SBA PPP loans.

**Dayton MSA AA**

LCNB's borrower distribution of small loans to small businesses in the Dayton MSA AA is adequate.

The bank originated 37.3 percent of its small loans to businesses with revenues of \$1 million or less. In comparison, the bank's percentage is below the percentage of businesses with revenues of \$1 million or less at 81.7 percent and below the aggregate lending percentage of small loans to businesses of 40.5 percent. The OCC noted that 41.6 percent of the loans were to businesses with income not available, with the majority being SBA PPP loans.

#### Non-MSA AA

LCNB's borrower distribution of small loans to small businesses in the Non-MSA AA is adequate.

The bank originated 35.7 percent of its small loans to businesses with revenues of \$1 million or less. In comparison, the bank's percentage is below the percentage of businesses with revenues of \$1 million or less at 78.4 percent and below the aggregate lending percentage of small loans to small businesses of 37.4 percent. The OCC noted that 45 percent of the loans were to businesses with income not available, with the majority being SBA PPP loans.

#### ***Small Loans to Farms***

The bank's borrower distribution of small loans to farms is excellent. However, as this is not a primary product for the bank and due to limited lending volume, small farm lending has a neutral impact on the overall lending rating.

Refer to Table T in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

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

#### Cincinnati MMSA AA

LCNB's borrower distribution of small loans to farms in the Cincinnati MMSA AA is excellent. In the analysis, the OCC considered that this AA is largely urban or suburban, limiting opportunities for farm lending.

During 2019 and 2020, the bank originated 90 percent of its small loans to farms with revenues of \$1 million or less. In total, the bank only originated 20 small loans to farms in 2019 – 2020. In comparison, the bank's percentage is near the percentage of farms with revenues of \$1 million or less at 96.3 percent and significantly exceeds the aggregate lending percentage of small loans to farms of 69.5 percent. In 2021, the bank did not make a sufficient volume of small loans to farms to allow for meaningful quantitative analysis.

#### Columbus MSA AA

LCNB's origination volume of farm loans in the Columbus MSA AA were not sufficient to allow for meaningful quantitative analysis. As a result, farm loans in this AA were not included in the evaluation. This AA is largely urban or suburban, limiting opportunities for farm lending.

### Dayton MSA AA

LCNB's origination volume of farm loans in the Dayton MSA AA were not sufficient to allow for meaningful quantitative analysis. As a result, farm loans in this AA were not included in the evaluation. This AA is largely urban or suburban, limiting opportunities for farm lending.

### Non-MSA AA

LCNB's borrower distribution of small loans to farms in the Non-MSA AA is excellent.

The bank originated 81.9 percent of its small loans to farms with revenues of \$1 million or less. In comparison, the bank's percentage is below the percentage of farms with revenues of \$1 million or less at 98.1 percent but significantly exceeds the aggregate lending percentage of small loans to farms of 51 percent. A majority of the bank's farm lending is in the Non-MSA AA.

## **Community Development Lending**

The institution is a leader in making CD loans.

The Lending Activity Tables, shown above under Lending Activity on pages 17 and 18, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

During the evaluation period, the bank originated 36 qualifying CD loans within its AAs, totaling \$71.5 million and representing 40.7 percent of total tier 1 capital.

### Cincinnati MMSA AA

LCNB's CD lending within the Cincinnati MMSA AA is excellent. The bank originated 18 qualified CD loans totaling \$34.6 million, representing 33.3 percent of allocated tier 1 capital based on total deposits in the AA. A majority of the CD loans helped revitalize or stabilize LMI geographies. Examples of CD loans in the AA include:

- Three loans totaling \$8.7 million to a manufacturing plant located in a low-income CT. The company is considered an anchor in the community and employs area residents.
- A \$7.9 million SBA Certified Development Company 504 loan for a brewery.
- A \$3.3 million construction loan to expand a business located in a moderate-income CT, creating new job opportunities for area residents.
- A \$2.5 million construction loan to build apartments in a low-income CT as part of the city of Hamilton's revitalization plan.
- Two loans totaling \$1.3 million for refinancing the city of Cincinnati Development Fund loans for the renovation of affordable housing properties in low-income CTs.

- A \$246,000 loan to an organization, located in a moderate-income CT, that provides affordable housing for developmentally disabled, addicted, or homeless populations.

### Columbus MSA AA

LCNB's CD lending within the Columbus MSA AA is excellent. The bank originated 14 qualified CD loans totaling \$34.9 million, representing 277.7 percent of allocated tier 1 capital based on total deposits in the AA. A majority of the CD loans helped revitalize and stabilize LMI geographies and provided economic development within the AA. Examples of CD loans in the AA include:

- A \$10 million loan for construction of a mixed-use property located in a low-income CT. The project is in a neighborhood designated by the city of Columbus for redevelopment/revitalization.
- Two loans totaling \$5.9 million under the SBA Certified Development Company 504 loan program for the purchase of a hotel.
- A \$1.2 million loan to acquire office and warehouse space in a moderate-income CT which will promote economic development and employ area residents.
- A \$975,000 loan to purchase an affordable housing multifamily building which has received funding, in part, through the Low-Income Housing Tax Credit (LIHTC) program.
- A \$122,000 loan to refinance a loan for an affordable housing multiunit property located in a low-income CT.

### Dayton MSA AA

LCNB's CD lending within the Dayton MSA AA is adequate. The bank originated two qualified CD loans totaling \$356,250, representing 2 percent of allocated tier 1 capital based on total deposits in the AA. Both loans were for multifamily affordable housing in LMI CTs.

### Non-MSA AA

LCNB's CD lending within the Non-MSA AA is adequate. The bank originated two qualified CD loans totaling \$1.7 million, representing 4 percent of allocated tier 1 capital based on total deposits in the AA. One loan for \$1 million was for multifamily affordable housing in a moderate-income CT. The other loan for \$621,187 was made as part of the United States Department of Agriculture (USDA) Beginning Farmer and Rancher Loan program in a moderate-income CT.

### Statewide/Regional

LCNB is adequately responsive to the CD needs in its AAs so additional consideration was given to seven CD loans, totaling \$5.8 million, in the broader regional areas. Five loans were for affordable housing properties in LMI CTs and two loans were SBA 504 loans for the purchase of commercial real

estate. Statewide/Regional CD development lending equated to 3.3 percent of the bank's total tier 1 capital.

### **Product Innovation and Flexibility**

The institution makes use of innovative and/or flexible lending practices in order to serve AA credit needs.

#### *Paycheck Protection Program (PPP)*

The bank made use of responsive flexible lending during the COVID-19 pandemic in 2020 and 2021 by originating loans to stabilize small businesses and communities through the SBA PPP. According to internal bank records, the bank originated 359 PPP loans totaling \$39.6 million in the Cincinnati MMSA AA, 59 PPP loans totaling \$5.7 million in the Columbus MSA AA, 70 PPP loans totaling \$9.3 million in the Dayton MSA AA, 127 PPP loans totaling \$7.9 million in the Non-MSA AA, and 58 PPP loans totaling \$6.8 million outside the bank's AAs. This activity received positive consideration as it provided stabilization of small businesses and communities.

#### *Covid-19 Emergency Loan Assistance*

During the COVID-19 pandemic, LCNB offered emergency hardship assistance to both consumer and business customers through payment deferrals. According to internal bank reports, LCNB approved 613 loan deferrals totaling \$3.9 million in deferred interest during the evaluation period.

#### *Unsecured Home Improvement Loans*

LCNB identified availability of loans for home improvements as a need within its communities and offered an unsecured home improvement loan to help homeowners maintain their homes without the need for additional collateral. These are typically smaller dollar loans. According to internal bank reports, LCNB originated 54 unsecured home improvement loans during the evaluation period, with the majority in the Non-MSA AA. Overall, the bank originated approximately 16.7 percent of these loans in LMI CTs and 24.1 percent to LMI borrowers.

### **Investment Test**

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

### **Conclusions for Areas Receiving Full-Scope Reviews**

Based on full-scope reviews, the bank's performance in the Dayton MSA AA and Columbus MSA AA is excellent. The bank's performance in the Cincinnati MMSA AA is good, while the Non-MSA AA is adequate. During the evaluation period, LCNB made a total of 178 qualifying investments, including broader regional investments, totaling \$19.9 million which equates to 11.4 percent of total tier 1 capital based on total deposits in the AA.

The institution has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits good responsiveness to credit and community economic development needs. The institution occasionally uses innovative and/or complex investments to support CD initiatives.

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 AA	5	1,080	87	1,354	92	51.7	2,434	12.2	0	0
Columbus MSA AA	0	0	17	2,590	17	9.5	2,590	13.0	0	0
Dayton MSA AA	4	281	26	3,231	30	16.9	3,512	17.6	0	0
Non-MSA AA	0	0	32	54	32	18.0	54	0.3	0	0
Regional Area – with Purpose, Mandate, Function	4	3,335	3	8,000	7	3.9	11,335	56.9	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.

### Cincinnati MMSA AA

The quantity of qualifying investments specifically attributable to the Cincinnati MMSA AA is good. LCNB made 92 qualifying investments totaling \$2.4 million which equates to 2.3 percent of allocated tier 1 capital based on total deposits in the AA. LCNB has five prior period investments in mortgage-backed securities with a book value of almost \$1.1 million as of December 31, 2021, relating primarily to mortgages granted to LMI borrowers. The bank also purchased almost \$1.2 million in mortgage-backed securities with similar characteristics during the evaluation period as part of a CRA qualified investment fund. In addition, LCNB made 86 donations totaling \$197,000 that supported child welfare, homeless shelters, emergency food needs, and job training assistance to LMI families in the area. The bank also provided funds to support the unexpected needs brought forth from the COVID-19 pandemic in 2020 above what was anticipated for the year. The support of numerous community service organizations reflects good responsiveness to identified investment needs.

### Columbus MSA AA

The quantity of qualifying investments specifically attributable to the Columbus MSA AA is excellent. LCNB made 17 qualifying investments totaling \$2.6 million which equates to 20.6 percent of allocated tier 1 capital based on total deposits in the AA. The bank purchased a mortgage-backed security related primarily to mortgages granted to LMI borrowers in the amount of approximately \$2.6 million. LCNB also made 16 donations totaling \$33,000 that support scholarships, financial literacy, and food banks for LMI individuals and families. The support of numerous community service organizations reflects excellent responsiveness to identified investment needs.

### Dayton MSA AA

The quantity of qualifying investments specifically attributable to the Dayton MSA AA is excellent. LCNB made 30 qualifying investments totaling \$3.5 million which equates to 19.7 percent of allocated tier 1 capital based on total deposits in the AA. Prior to the current review period, the bank purchased mortgage-backed securities related primarily to mortgages granted to LMI borrowers with a current book value of approximately \$281,000 as of December 31, 2021. The bank purchased an additional \$172,000 in mortgage-backed securities with similar characteristics during the evaluation period as part of a CRA qualified investment fund. Additionally, the bank purchased \$3 million in Low-Income Housing Tax Credits (LIHTC) to rehabilitate a senior living facility with 100 percent occupancy of low-income senior residents. LCNB made 24 donations totaling \$59,000 that support child welfare, senior citizen services, health screenings, and job training assistance to LMI individuals and families in the AA. The bank provided additional funds throughout 2020 to support the community during the COVID-19 pandemic.

### Non-MSA AA

The quantity of qualifying investments specifically attributable to the Non-MSA AA is adequate. LCNB made 32 qualifying investments totaling \$54,000 which equates to less than 1 percent of allocated tier 1 capital based on total deposits in the AA. These donations support scholarships, homelessness, economic development, and financial literacy. Fewer opportunities exist in this AA as needs tend to be less pronounced in these largely stable middle-income geographies.

### Broader Regional Area

LCNB is adequately responsive to the CD needs in its AAs so additional consideration was given to broader regional investments. In addition to the investments mentioned above that are attributable to specific AAs, LCNB made significant amounts of qualified investments that are responsive to affordable housing needs. The bank purchased LIHTC from the Ohio Capital Corporation for Housing (OCCH) in the amount of \$8 million. This investment assisted in the creation or preservation of housing units throughout Ohio. Housing units are primarily in the Cincinnati and Dayton AAs with additional units in the Columbus and Non-MSA AA. The OCCH is an independent, mission-driven nonprofit that works with private and public developers to create affordable housing opportunities throughout Ohio. The bank also maintained a prior period investment in the OCCH valued at \$3.3 million.

### **Service Test**

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

### **Conclusions for Areas Receiving Full-Scope Reviews**

Based on full-scope reviews, the bank's performance in the Cincinnati MMSA AA and Non-MSA AA is good, while overall performance in the Columbus MSA AA and Dayton MSA AA is adequate.

## Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System, as of December 31, 2021											
Assessment Area	Deposits % of Rated Area Deposits in AA	Branches						Population			
		# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Cincinnati MMSA AA	59.1	19	59.4	5.3	5.3	73.7	10.5	8.9	18.8	35.7	35.0
Columbus MSA AA	7.2	1	3.1	0.0	0.0	0.0	100.0	12.8	22.9	26.9	36.4
Dayton MSA AA	10.2	3	9.4	0.0	0.0	33.3	66.7	12.8	21.5	46.2	19.4
Non-MSA AA	23.5	9	28.1	0.0	44.4	44.4	11.1	0.0	22.0	64.3	13.7

\*Totals may not equal 100% due to rounding and/or a non-applicable (NA) geographic category which consists of geographies that have not been assigned an income classification.

Distribution of Branch Openings/Closings, as of December 31, 2021						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Cincinnati MMSA AA	0	1				-1
Columbus MSA AA	0	0				
Dayton MSA AA	0	0				
Non-MSA AA	0	2			-2	

To the extent changes have been made, the bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. LCNB did not open any branches and closed three branches during the evaluation period. The bank closed one branch in the Cincinnati MMSA AA in an upper-income CT in 2021. LCNB closed two branches in the Non-MSA AA in 2020, both in middle-income CTs. None of the closed branches were located adjacent to LMI CTs.

Services, including where appropriate, business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or individuals. Business hours are overall standard and uniform across the branches. Management complements its traditional service delivery methods with certain alternative delivery channels, including online banking, mobile banking, ATMs, and telephone banking. These delivery methods provide access to banking services throughout all portions of the AAs. Management was able to provide limited data on mobile banking that indicated its use has increased significantly over the evaluation period. The OCC could not place significant weight on these alternative delivery systems because management did not maintain metrics to determine their effectiveness in helping to meet the credit needs of LMI individuals.

#### Cincinnati MMSA AA

LCNB's branch distribution in the Cincinnati MMSA AA is good. Branches are reasonably accessible to geographies and individuals of different income levels in the AA. There is one branch located in a low-income CT and one branch located in moderate-income CT. The percentage of branches in low-income geographies was below the percentage of the population in low-income geographies. The percentage of branches located in the moderate-income geographies was significantly below the percentage of the population in the moderate-income geographies. However, LCNB has three additional branches located within a half mile of moderate-income CTs. These branches serve the nearby moderate-income communities. When considering the branches in proximity to moderate-income CTs, the percentage of branches serving moderate-income CTs exceeded the percentage of the population in those geographies. In addition, LCNB is a small market participant in Hamilton County where the majority of the LMI CTs are located. During the evaluation period, one of the two branches in Hamilton County was near several moderate-income CTs.

#### Columbus MSA AA

LCNB's branch distribution is poor. Branches are not readily accessible to LMI CTs. LCNB has only one full-service branch in the Columbus MSA and no ATMs. The sole branch is near one low- and one moderate-income CT. Even with proximity to LMI tracts, the population of LMI individuals greatly exceeds the number potentially serviced by the branch. LCNB is not a significant holder of deposit market share in the Columbus MSA (less than 1 percent) where there are many large banks who provide services to the LMI tracts and are significant Columbus MSA AA market participants.

#### Dayton MSA AA

LCNB's branch distribution is poor. Branches are not readily accessible to LMI CTs. LCNB maintains only three banking offices in the Dayton MSA AA, none of which are in or near LMI CTs. However, the LMI CTs in the Dayton MSA AA are being served by several large banks that are significant Dayton MSA AA market participants.

#### Non-MSA AA

LCNB's branch distribution is excellent. Branches are readily accessible to moderate-income CTs within the AA. LCNB operates nine full-service branches in the AA which is comprised of Clinton, Fayette, Ross, and Preble Counties. There are ten moderate-income CTs in this area and no low-income CTs. Six of the nine branches are in, or very accessible to, the moderate-income CTs. The percentage

of branches located in or adjacent to the moderate-income tracts is significantly higher than the population of moderate-income individuals in the AA.

## **Community Development Services**

The institution provides an adequate level of CD services.

### Cincinnati MMSA AA

In the Cincinnati MMSA AA, LCNB's performance in providing CD services is good. Within the AA, 12 employees provided services to 17 different organizations, with most on an annual basis. In the AA, a few employees participated in more than one CD service. Of the services performed, 13 demonstrated leadership by serving on the board or a leadership committee of an organization. Approximately 11 services supported community services for LMI individuals, two supported affordable housing initiatives, and four supported economic development and/or revitalization/stabilization efforts. Given that many employees and 19 of the bank's branches in the state are located in this AA, this is considered an overall good level of CD services.

### Columbus MSA AA

In the Columbus MSA AA, LCNB's performance in providing CD services is adequate. Within the AA, two employees provided services to two organizations, with most on an annual basis. Employees demonstrated leadership by serving on the board or committee of one of the organizations. The organizations supported economic development and/or revitalization/stabilization efforts. Given the small number of employees and with only one branch located in the Columbus MSA, this is considered an adequate level of CD services.

### Dayton MSA AA

In the Dayton MSA AA, LCNB's performance in providing CD services is adequate. Within the AA, four employees provided services to four organizations, with most on an annual basis. Employees demonstrated leadership by serving on the board or committee of two of the organizations. Three services supported community services for LMI individuals and one supported economic development and supported revitalization/stabilization efforts. Given the small number of employees and with just three branches located in the Dayton MSA, this is considered an adequate level of CD services.

### Non-MSA AA

In the Non-MSA AA, LCNB's performance in providing CD services is adequate. Within the AA, six employees provided services to seven different organizations, with most on an annual basis. In the AA, one employee participated in more than one CD service. Of the services performed, seven demonstrated leadership by serving on the board or a leadership committee of an organization. Three services supported community services for LMI individuals and/or affordable housing initiatives and four supported economic development, business development, and/or revitalization/stabilization efforts. Given that many employees and nine of the bank's branches in the state are located in this AA, this is considered an adequate level of CD services.

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed:</b>	01/01/19 – 12/31/21	
<b>Bank Products Reviewed:</b>	Home mortgage, small business, and small farm loans CD loans, qualified investments, CD services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>State of Ohio</b>		
Cincinnati MMSA AA	Full-scope	2019 – 2020: Counties of Butler and Warren; partial counties of Clermont and Hamilton. 2021: Counties of Butler, Clermont, Hamilton, and Warren.
Columbus MSA AA	Full-scope	2019 – 2020: County of Franklin; partial county of Delaware. 2021: Counties of Delaware and Franklin.
Dayton MSA AA	Full-scope	County of Montgomery
Non-MSA AA	Full-scope	Counties of Clinton, Fayette, Preble, and Ross

## Appendix B: Summary of State Ratings

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RATINGS: LCNB NATIONAL BANK				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
LCNB National Bank	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
MMSA or State:				
Ohio	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory

(\*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

## Appendix C: Definitions and Common Abbreviations

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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/AA.

**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 CT delineated by the U.S. 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 §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

**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/AA.

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

**Middle-Income:** Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography.

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

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

**MMSA (state):** 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.

**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.

**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

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### 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 loans are treated the same 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 30<sup>th</sup> 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/AA. 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 AA
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. 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 T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** – Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/AA.

## State of Ohio

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
Cincinnati MMSA AA	524	112,165	84.4	58,625	4.4	1.0	2.4	14.1	5.2	9.7	37.1	43.9	34.2	44.3	49.0	53.6	0.1	1.0	0.1
Columbus MSA AA	97	55,061	15.6	85,889	6.6	17.5	5.0	19.7	15.5	14.6	28.3	15.5	26.4	45.4	50.5	54.0	0.0	1.0	0.0
<b>Total</b>	<b>621</b>	<b>167,226</b>	<b>100.0</b>	<b>144,514</b>	<b>5.6</b>	<b>3.5</b>	<b>3.9</b>	<b>17.2</b>	<b>6.8</b>	<b>12.6</b>	<b>32.3</b>	<b>39.5</b>	<b>29.6</b>	<b>44.9</b>	<b>49.3</b>	<b>53.8</b>	<b>0.0</b>	<b>1.0</b>	<b>0.1</b>

*Source: 2015 ACS; 01/01/2019 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%*

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
Cincinnati MMSA AA	289	103,321	85.8	92,843	4.1	3.8	2.5	15.1	9.3	11.2	39.2	39.4	36.5	41.5	45.3	49.7	0.1	2.1	0.1
Columbus MSA AA	48	58,943	14.2	90,128	6.4	6.3	4.7	18.9	14.6	13.9	28.8	25.0	26.6	45.9	52.1	54.8	0.0	2.1	0.0
<b>Total</b>	<b>337</b>	<b>162,264</b>	<b>100.0</b>	<b>182,971</b>	<b>5.1</b>	<b>4.2</b>	<b>3.6</b>	<b>16.8</b>	<b>10.1</b>	<b>12.5</b>	<b>34.6</b>	<b>37.4</b>	<b>31.6</b>	<b>43.4</b>	<b>46.3</b>	<b>52.2</b>	<b>0.1</b>	<b>2.1</b>	<b>0.1</b>

*Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%*

**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2019-21**

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
Dayton MSA AA	125	23,543	22.4	21,900	8.5	3.2	3.0	18.1	3.2	12.6	49.8	65.6	52.7	23.6	28.0	31.8	0.0	0.0	0.0
Non-MSA AA	434	58,136	77.6	6,923	0.0	0.0	0.0	18.1	10.4	16.9	66.1	71.0	65.0	15.9	18.7	18.1	0.0	0.0	0.0
<b>Total</b>	<b>559</b>	<b>81,679</b>	<b>100.0</b>	<b>28,823</b>	<b>6.2</b>	<b>0.7</b>	<b>2.3</b>	<b>18.1</b>	<b>8.8</b>	<b>13.6</b>	<b>54.2</b>	<b>69.8</b>	<b>55.6</b>	<b>21.5</b>	<b>20.8</b>	<b>28.5</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2019-2020**

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
Cincinnati MMSA AA	524	112,165	84.4	58,625	21.2	8.0	7.0	16.0	18.5	16.2	20.1	22.5	19.9	42.6	42.2	40.7	0.0	8.8	16.2
Columbus MSA AA	97	55,061	15.6	85,889	22.9	1.0	6.6	16.7	2.1	16.3	18.5	6.2	20.0	42.0	34.0	40.7	0.0	56.7	16.3
<b>Total</b>	<b>621</b>	<b>167,226</b>	<b>100.0</b>	<b>144,514</b>	<b>22.2</b>	<b>6.9</b>	<b>6.8</b>	<b>16.4</b>	<b>15.9</b>	<b>16.3</b>	<b>19.2</b>	<b>20.0</b>	<b>20.0</b>	<b>42.3</b>	<b>40.9</b>	<b>40.7</b>	<b>0.0</b>	<b>16.3</b>	<b>16.3</b>

Source: 2015 ACS; 01/01/2019 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%

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
Cincinnati MMSA AA	289	103,321	85.8	92,843	22.3	6.2	6.7	16.1	15.2	15.9	19.4	19.0	19.5	42.2	48.1	42.0	0.0	11.4	15.9
Columbus MSA AA	48	58,943	14.2	90,128	22.5	8.3	6.4	16.6	0.0	16.0	18.5	12.5	20.0	42.4	27.1	41.3	0.0	52.1	16.3
<b>Total</b>	<b>337</b>	<b>162,264</b>	<b>100.0</b>	<b>182,971</b>	<b>22.4</b>	<b>6.5</b>	<b>6.6</b>	<b>16.3</b>	<b>13.1</b>	<b>15.9</b>	<b>19.0</b>	<b>18.1</b>	<b>19.7</b>	<b>42.3</b>	<b>45.1</b>	<b>41.7</b>	<b>0.0</b>	<b>17.2</b>	<b>16.1</b>

*Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%*

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
Dayton MSA AA	125	23,543	22.4	21,900	25.5	13.6	8.2	17.8	20.0	19.0	19.6	18.4	20.5	37.1	35.2	33.6	0.0	12.8	18.8
Non-MSA AA	434	58,136	77.6	6,923	21.7	7.8	5.2	19.0	18.9	17.0	20.9	22.4	23.6	38.4	47.2	35.4	0.0	3.7	18.8
<b>Total</b>	<b>559</b>	<b>81,679</b>	<b>100.0</b>	<b>28,823</b>	<b>24.5</b>	<b>9.1</b>	<b>7.4</b>	<b>18.1</b>	<b>19.1</b>	<b>18.5</b>	<b>20.0</b>	<b>21.5</b>	<b>21.2</b>	<b>37.5</b>	<b>44.5</b>	<b>34.0</b>	<b>0.0</b>	<b>5.7</b>	<b>18.8</b>

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%*

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																			<b>2019-2020</b>		
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		
Cincinnati MMSA AA	413	62,153	70.5	19,161	8.3	3.4	7.5	14.8	20.6	13.3	32.4	47.0	31.6	42.8	28.8	46.1	1.7	0.2	1.5		
Columbus MSA AA	173	45,611	29.5	32,610	10.7	9.2	8.9	18.1	11.6	15.3	24.7	20.8	22.6	45.8	57.8	52.8	0.6	0.6	0.3		
<b>Total</b>	<b>586</b>	<b>107,764</b>	<b>100.0</b>	<b>51,771</b>	<b>9.9</b>	<b>5.1</b>	<b>8.4</b>	<b>17.0</b>	<b>17.9</b>	<b>14.5</b>	<b>27.3</b>	<b>39.2</b>	<b>26.0</b>	<b>44.8</b>	<b>37.4</b>	<b>50.3</b>	<b>1.0</b>	<b>0.3</b>	<b>0.8</b>		

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

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																			<b>2021</b>		
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		
Cincinnati MMSA AA	281	33,427	79.2	36,254	7.4	3.2	7.0	18.0	19.2	16.8	31.5	41.3	31.4	41.9	34.9	43.9	1.3	1.4	0.9		
Columbus MSA AA	74	21,303	20.8	33,556	10.4	10.8	8.7	17.8	12.2	14.8	24.9	24.3	22.9	46.2	52.7	53.2	0.6	0.0	0.3		
<b>Total</b>	<b>355</b>	<b>54,730</b>	<b>100.0</b>	<b>69,810</b>	<b>9.0</b>	<b>4.8</b>	<b>7.8</b>	<b>17.9</b>	<b>17.7</b>	<b>15.9</b>	<b>28.1</b>	<b>37.7</b>	<b>27.3</b>	<b>44.1</b>	<b>38.6</b>	<b>48.4</b>	<b>0.9</b>	<b>1.1</b>	<b>0.6</b>		

*Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0%*

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2019-21**

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
Dayton MSA AA	166	29,254	38.2	8,970	10.2	2.4	9.5	19.8	20.5	18.9	47.3	58.4	46.3	22.7	18.7	25.3	0.0	0.0	0.0
Non-MSA AA	269	31,860	61.8	1,990	0.0	0.0	0.0	33.9	30.5	30.8	54.7	62.5	56.7	11.4	7.1	12.5	0.0	0.0	0.0
<b>Total</b>	<b>435</b>	<b>61,114</b>	<b>100.0</b>	<b>10,960</b>	<b>8.1</b>	<b>0.9</b>	<b>7.7</b>	<b>22.7</b>	<b>26.7</b>	<b>21.1</b>	<b>48.8</b>	<b>60.9</b>	<b>48.2</b>	<b>20.3</b>	<b>11.5</b>	<b>23.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0%.

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2019-2020**

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
Cincinnati MSA AA	413	62,153	70.5	19,161	83.7	43.1	43.8	5.3	19.6	11.0	37.3
Columbus MSA AA	173	45,611	29.5	32,610	83.8	45.1	41.7	5.3	31.2	10.9	23.7
<b>Total</b>	<b>586</b>	<b>107,764</b>	<b>100.0</b>	<b>51,771</b>	<b>83.8</b>	<b>43.7</b>	<b>42.5</b>	<b>5.3</b>	<b>23.0</b>	<b>10.9</b>	<b>33.3</b>

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

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2021</b>
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
Cincinnati MMSA AA	281	33,427	79.2	36,254	82.1	21.7	43.5	5.9	13.5	12.0	64.8
Columbus MSA AA	74	21,303	20.8	33,556	83.9	36.5	41.9	5.0	37.8	11.1	25.7
<b>Total</b>	<b>355</b>	<b>54,730</b>	<b>100.0</b>	<b>69,810</b>	<b>83.0</b>	<b>24.8</b>	<b>42.7</b>	<b>5.5</b>	<b>18.6</b>	<b>11.5</b>	<b>56.6</b>

*Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0%.*

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2019-21</b>
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
Dayton MSA AA	166	29,254	38.2	8,970	81.7	37.3	40.5	6.1	21.1	12.2	41.6
Non-MSA AA	269	31,860	61.8	1,990	78.4	35.7	37.4	4.9	19.3	16.6	45.0
<b>Total</b>	<b>435</b>	<b>61,114</b>	<b>100.0</b>	<b>10,960</b>	<b>81.0</b>	<b>36.3</b>	<b>40.0</b>	<b>5.9</b>	<b>20.0</b>	<b>13.1</b>	<b>43.7</b>

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0%.*

<b>Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography</b>																			<b>2019-2020</b>		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate		
Cincinnati MMSA AA	20	2,586	100.0	105	3.7	0.0	3.8	10.5	0.0	3.8	45.2	80.0	53.3	40.3	20.0	39.0	0.3	0.0	0.0		
Columbus MSA AA	0	0	0.0	158	8.3	0.0	6.3	18.2	0.0	10.8	28.2	0.0	31.0	45.1	0.0	51.9	0.2	0.0	0.0		
<b>Total</b>	<b>20</b>	<b>2,586</b>	<b>100.0</b>	<b>263</b>	<b>6.1</b>	<b>0.0</b>	<b>5.3</b>	<b>14.6</b>	<b>0.0</b>	<b>8.0</b>	<b>36.1</b>	<b>80.0</b>	<b>39.9</b>	<b>42.9</b>	<b>20.0</b>	<b>46.8</b>	<b>0.2</b>	<b>0.0</b>	<b>0.0</b>		

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

<b>Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography</b>																			<b>2021</b>		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate		
Cincinnati MMSA AA	16	2,267	100.0	155	3.5	0.0	3.9	13.6	18.8	7.7	45.1	43.8	49.7	37.6	37.5	38.7	0.2	0.0	0.0		
Columbus MSA AA	0	0	0.0	181	7.6	0.0	5.5	16.6	0.0	9.4	29.7	0.0	32.6	45.8	0.0	52.5	0.2	0.0	0.0		
<b>Total</b>	<b>16</b>	<b>2,267</b>	<b>100.0</b>	<b>336</b>	<b>5.3</b>	<b>0.0</b>	<b>4.8</b>	<b>14.9</b>	<b>18.8</b>	<b>8.6</b>	<b>38.4</b>	<b>43.8</b>	<b>40.5</b>	<b>41.2</b>	<b>37.5</b>	<b>46.1</b>	<b>0.2</b>	<b>0.0</b>	<b>0.0</b>		

*Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0%*

**Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2019-21**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Dayton MSA AA	3	329	2.8	37	5.6	0.0	0.0	17.0	0.0	8.1	56.6	66.7	73.0	20.7	33.3	18.9	0.0	0.0	0.0
Non-MSA AA	105	17,777	97.2	206	0.0	0.0	0.0	13.4	10.5	5.8	72.2	86.7	83.0	14.4	2.9	11.2	0.0	0.0	0.0
<b>Total</b>	<b>108</b>	<b>18,106</b>	<b>100.0</b>	<b>243</b>	<b>2.9</b>	<b>0.0</b>	<b>0.0</b>	<b>15.3</b>	<b>10.2</b>	<b>6.2</b>	<b>64.2</b>	<b>86.1</b>	<b>81.5</b>	<b>17.6</b>	<b>3.7</b>	<b>12.3</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0%.

**Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2019-2020**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Cincinnati MMSA AA	20	2,586	100.0	105	96.3	90.0	69.5	1.9	0.0	1.7	10.0
Columbus MSA AA	0	0	0.0	158	94.1	0.0	63.9	3.4	0.0	2.6	0.0
<b>Total</b>	<b>20</b>	<b>2,586</b>	<b>100.0</b>	<b>263</b>	<b>95.1</b>	<b>90.0</b>	<b>66.2</b>	<b>2.7</b>	<b>0.0</b>	<b>2.2</b>	<b>10.0</b>

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

<b>Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues</b>											<b>2021</b>
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Cincinnati MMSA AA	16	2,267	100.0	155	96.0	68.8	64.5	2.0	0.0	2.0	31.3
Columbus MSA AA	0	0	0.0	181	94.6	0.0	63.5	2.9	0.0	2.5	0.0
<b>Total</b>	<b>16</b>	<b>2,267</b>	<b>100.0</b>	<b>336</b>	<b>95.4</b>	<b>68.8</b>	<b>64.0</b>	<b>2.4</b>	<b>0.0</b>	<b>2.2</b>	<b>31.3</b>
<i>Source: 2021 D&amp;B Data; 01/01/2021 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0%.</i>											

<b>Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues</b>											<b>2019-21</b>
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Dayton MSA AA	3	329	2.8	37	95.5	66.7	48.6	2.5	0.0	2.0	33.3
Non-MSA AA	105	17,777	97.2	206	98.1	81.9	51.0	1.2	12.4	0.7	5.7
<b>Total</b>	<b>108</b>	<b>18,106</b>	<b>100.0</b>	<b>243</b>	<b>96.8</b>	<b>81.5</b>	<b>50.6</b>	<b>1.9</b>	<b>12.0</b>	<b>1.4</b>	<b>6.5</b>
<i>Source: 2021 D&amp;B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0%.</i>											