



Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

July 6, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Signature Bank, N.A.

Charter Number 24264

4607 West Sylvania Avenue
Toledo, OH 43623

Office of the Comptroller of the Currency

200 Public Square Suite 1610
Cleveland, OH 44114-2301

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.

Table of Contents

OVERALL CRA RATING2
SCOPE OF THE EVALUATION3
DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW4
STATE RATING.....5
 STATE OF OHIO.....5
APPENDIX A: SCOPE OF EXAMINATIONA-1
APPENDIX B: SUMMARY OF MMSA AND STATE RATINGSB-1
APPENDIX C: DEFINITIONS AND COMMON ABBREVIATIONSC-1
APPENDIX D: TABLES OF PERFORMANCE DATAD-1

Overall CRA Rating

Institution’s CRA Rating: This institution is rated **Satisfactory**

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- The Lending Test rating is based on a majority of lending occurring in the bank’s assessment area (AA), a reasonable loan-to-deposit (LTD) ratio, reasonable geographic distribution of small business loans, and a reasonable distribution of small business loans among businesses of different sizes.
- The Community Development (CD) Test rating is based on excellent responsiveness to community needs through qualified CD loans and services, and an adequate level of investments given the bank’s capacity and the need and availability of such opportunities in the bank’s AA.
- The bank showed excellent responsiveness to the credit needs of its borrowers during the COVID-19 Pandemic by participating in the Small Business Administration’s (SBA) Paycheck Protection Program (PPP).

Loan-to-Deposit Ratio

Signature Bank, N.A.’s (SB or bank) LTD ratio is reasonable given the bank’s size, financial condition, and credit needs of its AA. The bank’s LTD ratio is calculated on a bank-wide basis and meets the standard for satisfactory performance. During the evaluation period, the bank’s average quarterly LTD ratio was 90.8 percent, with quarterly ratios ranging from a high of 98.8 percent in the second quarter of 2018 to a low of 79.8 percent in the fourth quarter of 2020. In comparison, the average quarterly LTD ratio for the one similarly situated institution in the bank’s AA was 89.3 percent.

Lending in Assessment Area

A majority of the bank’s loans are inside its AA. During the evaluation period, the bank originated 77.5 percent by number and 75.0 percent by dollar amount of its total small loans to businesses within its AA. This analysis is performed at the bank level, rather than the AA level, resulting in a positive impact on the bank’s overall geographic distribution of lending by income level.

Lending Inside and Outside of the Assessment Area - 2018-2020										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Loans to Businesses	1262	77.5	366	22.5	1628	285,100	75.0	95,075	24.5	380,175

Source: 1/1/2018-12/31/2020 bank data. Due to rounding, totals may not equal 100.0%

Description of Institution

SB is an intrastate community bank headquartered in Toledo, Ohio. It is a wholly owned subsidiary of Signature Bancorp Inc., a one bank holding company, also headquartered in Toledo, Ohio. According to the Reports of Condition and Income, the bank's assets totaled \$1.2 billion as of December 31, 2020. As of year-end 2019 and 2018, the bank's assets totaled \$984.6 million and \$913.7 million, respectively. As of December 31, 2020, tier 1 capital was \$116.5 million, or 9.5 percent of total assets.

SB offers traditional banking products and services, but primarily serves commercial borrowers and their principal owners in the Toledo AA. The bank's loan portfolio grew 26.5 percent during the evaluation period. As of December 31, 2020, the loan portfolio totaled \$895.9 million, with 52.1 percent secured by real estate. The loan portfolio is comprised of 37.1 percent commercial loans, 34.9 percent nonfarm nonresidential properties, 10.0 percent other loans (such as loans for purchasing securities), 8.8 percent residential mortgages, 4.2 percent multi-family loans, 3.1 percent construction or land development loans, 1.1 percent home equity lines of credit (HELOCs), and less than 1.0 percent consumer loans.

During the evaluation period, SB operated in one AA, which is contiguous. The Toledo, Ohio AA includes all of Lucas County and a portion of Wood County and is part of the Toledo Metropolitan Statistical Area (MSA).

There are no legal, financial, or other factors impeding SB's ability to help meet the credit needs of the AA during the evaluation period. The bank received a "Satisfactory" rating on their previous CRA evaluation dated July 9, 2018.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This Performance Evaluation assesses SB's record of meeting the credit needs of its AA. We performed this review using Intermediate-Small Bank CRA procedures, which includes a lending test and a CD test. The Lending Test evaluates the bank's record of meeting the credit needs of the bank's AA through its small business lending activities. The CD Test evaluates the bank's responsiveness to CD needs in its AA through qualified lending, investments, donations, and services. The evaluation period for lending and CD activity covers January 1, 2018 to December 31, 2020.

We evaluated SB's lending performance based on its primary loan product of business loans. While the bank does offer home mortgage loans, HELOCs, and consumer loans, these products are not a primary focus for the bank. As a result, we did not consider these as part of our evaluation, as an analysis of this data would not be meaningful.

Selection of Areas for Full-Scope Review

SB has one AA in Ohio, and we performed a full-scope review of that AA. Please refer to *Appendix A, Scope of Examination*, for more information on the full-scope review of the AA.

Ratings

The bank's overall rating is based on performance within the bank's AA.

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 Consumer Financial Protection Bureau, as applicable.

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

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

State Rating

State of Ohio

CRA rating for the state of Ohio: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- The bank's geographic distribution of small business loans is reasonable.
- The bank exhibits a reasonable distribution of small loans to businesses of different sizes.
- The bank's level of CD loans and services is excellent.
- The bank made an adequate level of CD investments.
- The bank did not receive any complaints regarding its performance in helping meet the credit needs within its AA during the evaluation period.

Description of Institution's Operations in Ohio

During the evaluation period, SB operated a single full-service branch office in its AA, located in an upper-income census tract (CT) in Lucas County. The office is open Monday through Friday with after hours and weekend access by appointment. SB did not open or close any branch locations during the period.

SB's principal line of business is originating business loans. The bank also offers other loan products, including residential mortgages, HELOCs and consumer loans. However, given the bank's emphasis on businesses, these loans are not a lending focus of the bank and tend to be offered as a convenience to existing commercial customers. During 2020, the bank also offered PPP loans through the SBA.

SB's consumer deposit-related products and services include checking, savings, money market accounts, certificates of deposit, online and mobile banking, and bill pay. Business related products and services include checking, savings, business money market accounts, cash management services, courier services, electronic deposit, and online banking. SB does not own or operate any ATMs and does not have a drive-through. However, debit cards are available to customers and the bank reimburses up to \$30 per month in ATM fees.

Toledo AA

Demographic Information of the Assessment Area						
Assessment Area: Signature Bank - Toledo AA 2018-2020						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	140	25.0	17.9	34.3	22.1	0.7
Population by Geography	497,633	15.0	16.1	38.2	30.7	0.0
Housing Units by Geography	228,610	16.7	16.9	38.7	27.7	0.0
Owner-Occupied Units by Geography	126,397	8.1	14.0	41.4	36.5	0.0
Occupied Rental Units by Geography	76,340	24.7	19.3	38.2	17.7	0.0
Vacant Units by Geography	25,873	35.2	23.7	26.9	14.2	0.0
Businesses by Geography	30,364	14.1	10.2	36.9	38.8	0.0
Farms by Geography	728	5.5	10.0	37.6	46.8	0.0
Family Distribution by Income Level	122,956	24.4	16.4	18.9	40.2	0.0
Household Distribution by Income Level	202,737	26.7	15.5	15.9	41.9	0.0
Median Family Income MSA - 45780 Toledo, OH MSA		\$60,742	Median Housing Value			\$110,611
			Median Gross Rent			\$684
			Families Below Poverty Level			15.1%
<i>Source: 2015 ACS and 2020 D&B Data. Due to rounding, totals may not equal 100.0%. (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The Toledo AA meets the requirement of the CRA and does not arbitrarily exclude any low- or moderate-income CTs. The area offers both urban and suburban neighborhoods and is located on the state’s northern border with Michigan. Toledo is the primary city within the AA and contains most of the AA’s low- and moderate-income CTs. Based on 2015 American Community Survey (ACS) data, the AA consists of 140 CTs and includes 35 low-income CTs, 25 moderate-income CTs, 48 middle-income CTs, and 31 upper-income CTs. One CT has no income designation.

The AA is highly competitive, with a mixture of community banks and large banks serving the area. Per the June 30, 2020, Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, 18 institutions operate in the AA, maintaining 103 offices. This does not include credit unions or other financial services providers. SB ranked third in terms of deposit market share, with 10.8 percent, or \$1.2 billion of insured deposits. The largest competitors for deposits include Fifth Third Bank, Key Bank, PNC Bank, The Huntington National Bank, and Waterford Bank, which hold a combined 75.1 percent of the deposit market. SB’s deposit market share increased 1.8 percent during the evaluation period.

Significant competition for loans exists in the AA. Based on 2019 aggregate business loan data, 659 lenders originated business loans within the AA. The top five business lenders are large banks, which

account for 58.5 percent of the business lending in the AA. SB is not required to report its small business loan data.

A majority of non-farm businesses in the AA are small as measured by the number of employees and gross revenues. According to 2020 Dun & Bradstreet data, 80.8 percent of businesses located in the AA have less than \$1 million in gross annual revenues and 62.2 percent of businesses have fewer than five employees. Only 2.8 percent of businesses are headquartered in the AA, while 85.8 percent operate from a single location. Major employers include ProMedica Health Systems, Mercy Health Partners, The University of Toledo, and the Chrysler Group.

Economic conditions in the AA prior to the COVID-19 Pandemic lagged slightly behind the state of Ohio. The unemployment level at the beginning of 2018 for the AA was 5.9 percent, decreasing to 4.3 percent at year-end 2019. In comparison, the Ohio unemployment rate ranged from 5.3 percent in the beginning of 2018 to 3.9 percent at the end of 2019. The AA was significantly impacted by the COVID-19 Pandemic. At its peak, the AA's unemployment rate was 23.2 percent, and remained over 11.0 percent for five months in 2020. At the end of 2020, the AA's unemployment rate of 5.8 percent exceeded the state of Ohio rate of 5.3 percent. Per Moody's Analytics, the AA's economic recovery is trailing the rest of Ohio. The area's shrinking labor force, population loss, and lack of high-tech jobs are contributing factors to the slow recovery.

We conducted one community contact, which administers several CD programs, including rural development, home repair and rehabilitation, emergency housing assistance, homelessness assistance, senior housing, and small business loans targeted to new, small entrepreneurs, and small businesses in need of capital infusion. There is a high level of competition in the AA from larger banks, such as Fifth Third Bank and The Huntington National Bank, to participate, lend, or invest in CD activities. Areas of opportunities include bank referrals to their agency, grants for auto purchase and auto repairs for low-to moderate-income clients, funding for homeownership counseling, emergency assistance, down payment assistance, and general operating support.

Scope of Evaluation in Ohio

We evaluated SB's performance in the state of Ohio by performing a full-scope review of the bank's Toledo AA. We analyzed the bank's lending from January 1, 2018, through December 31, 2020, for the bank's primary lending product. Based on the bank's strategic plan, reports of lending activities over the review period, Reports of Condition and Income, and discussions with senior management, we determined the bank's primary area of lending focus is business loans. To develop our conclusions, we considered factors within the AA's community profile that would impact the bank's ability to lend within the AA, including demographic and market share information. The Office of Management and Budget (OMB) instituted changes to some MSA delineations that took effect January 1, 2019. The bank's AA was not impacted by the OMB changes, allowing 2018 through 2020 data to be combined for analysis.

For comparative purposes for business loans, we used 2018 and 2019 demographic and aggregate data, as 2020 information for business lending was not available at the time of our performance evaluation. We also utilized other supporting information while evaluating SB's CRA performance including 2015 ACS data, 2018 through 2020 bank loan data, internal bank records, FDIC deposit market share data, and information from governmental websites regarding the characteristics and economy of the bank's

AA. We also considered information from a community contact to help assess the needs of the bank's AA and the opportunities for financial institutions to lend and provide services within that area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO

LENDING TEST

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

Conclusions for Area Receiving Full-Scope Reviews

Based upon a full-scope review, the bank's lending performance in the state of Ohio is reasonable.

Distribution of Loans by Income Level of the Geography

SB exhibits reasonable geographic distribution of loans to small businesses in the state.

In determining our conclusion, we 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 low- and moderate-income CTs within the AA. For example, based on the 2015 ACS data, 75.7 percent of businesses in the AA are located in middle- and upper-income CTs.

Small Loans to Businesses

Refer to Table Q in the state of Ohio section of *Appendix D* for the facts and data used to evaluate SB's geographic distribution of small loans to businesses.

The bank's proportion of small loans to businesses at 10.7 percent in low-income CTs is near the percentage of businesses and the percentage of aggregate small loans to businesses at 14.1 percent and 11.4 percent, respectively. The proportion of the bank's small loans to businesses in moderate-income CTs at 10.8 percent exceeds both the percentage of businesses at 10.2 percent and the aggregate percentage of small loans to businesses at 9.8 percent.

Distribution of Loans by Income Level of the Borrower

SB exhibits a reasonable distribution of small loans to businesses of different sizes, given the product lines offered by the bank and the bank's capacity to lend.

Small Loans to Businesses

Refer to Table R in *Appendix D* for the facts and data used to evaluate the bank's distribution of small loans to businesses. In evaluating the borrower distribution of loans to businesses of different sizes, we 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.

The bank’s percentage of small loans to small businesses at 31.4 percent is significantly below the percentage of small businesses in the AA that report revenues of \$1 million or less at 80.6 percent. However, aggregate lending in the AA is also significantly less than the percentage of small businesses at 46.3 percent.

SB showed excellent responsiveness to the credit needs of its borrowers during the COVID-19 Pandemic in 2020 by participating in the SBA's PPP program. According to SB’s records, the bank originated 779 PPP loans totaling \$222.4 million.

Responses to Complaints

SB did not receive any complaints pertaining to the Community Reinvestment Act during the evaluation period.

Community Development Test

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

Conclusions for Areas Receiving Full-Scope Reviews

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

Number and Amount of Community Development Loans

SB demonstrated excellent responsiveness to the CD lending needs of the AA. Refer to the Community Development Loan table below for the facts and data used to evaluate the bank’s level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Toledo AA	30	100.0	\$27,316	100.0

SB originated 30 CD loans totaling \$27.3 million, which benefited the bank’s AA. When drawing our conclusions, we considered the level of competition for CD loans within the bank’s AA from larger financial institutions and the overall economic conditions impacting the bank’s ability to generate CD loans. Examples of CD loans include the following:

- Five loans totaling approximately \$7.0 million to a non-profit organization, located in a low-income CT, providing housing, meals, and other services to lower-income individuals and the homeless.

- Two loans totaling \$5.8 million used for the revitalization of a central Toledo industrial park located in a low-income CT, which will create jobs for area residents.
- One loan for \$1.5 million to a non-profit foundation for a solar panel array in a low-income CT. Proceeds generated from the sale of electricity will be reinvested in the surrounding community through grants to local non-profit organizations.
- Three loans totaling approximately \$1.2 million to a non-profit foundation providing housing for low- and moderate-income individuals with autism.
- Three loans totaling \$750,000 to a non-profit organization serving as a clearing house for agencies such as food pantries and daycare centers that feed those in need.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Toledo AA	0	0	122	\$793	122	100.0	\$793	100.0	0	0

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

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

The bank’s overall CD investment performance is adequate. The Qualified Investment Table, shown above, sets forth the information and data used to evaluate the bank’s level of qualified CD investments. This table includes all CD investments, including prior period investments that remain outstanding as of the evaluation date.

SB made 122 qualifying investments and donations, totaling \$793,000 inside the AA. The bank maintained five deposit accounts totaling \$375,000 at two local Community Development Financial Institutions (CDFIs) located in low-income CTs that provide financial services to low- and moderate-income individuals within the AA. The bank also made financial grants and in-kind donations totaling \$418,000 to 51 local community organizations for CD initiatives including affordable housing, social services for low- and moderate-income individuals, and neighborhood revitalization.

Extent to Which the Bank Provides Community Development Services

SB demonstrated an excellent level of responsiveness to community needs in the AA by participating in a variety of organizational services, mostly in leadership roles, that benefited low- and moderate-income individuals and supported economic development in the AA. SB provided financial and technical expertise to non-profit groups involved in affordable housing, social services for low- or moderate-income individuals, and economic revitalization. Examples of bank officer and staff participation are detailed below:

- Fourteen employees served as board members or treasurers of organizations focused on affordable housing and general social services for low- and moderate-income individuals.
- One employee served on several committees of a non-profit organization that facilitates charitable donations, assesses needs in the community, and provides grants for CD projects.
- One employee served on the board of a non-profit which solicits donations from businesses for financial aid that benefits low- and moderate-income students.
- One employee served as co-chair of the leadership group for a non-profit organization that provides access to healthcare for uninsured low-income residents.
- One employee served on the finance committee of a health foundation which organizes charitable giving to support low-income patients through programs, education, and financial assistance.

The bank also participates with the Federal Home Loan Bank of Cincinnati's Affordable Housing program and the Carol M. Peterson Housing Fund in conjunction with the Maumee Valley Habitat for Humanity Homeownership program, which provides grants to assist low- and moderate-income borrowers with home purchases, and up to \$7,500 per homeowner to fund emergency home repairs for low-income special needs and elderly homeowners.

Appendix A: Scope of Examination

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

Time Period Reviewed:	Lending Test (excludes CD loans): (01/01/18 to 12/31/20) Investment, Service Tests and CD Loans: (01/01/18 to 12/31/20)	
Bank Products Reviewed:	Business loans, CD loans, qualified investments, and CD services	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Ohio – Toledo AA	Full-Scope	All of Lucas County and a portion of Wood County. Part of the Toledo MSA

Appendix B: Summary of MMSA and State Ratings

Ratings – Signature Bank, N.A.			
Overall Bank:	Lending Test Rating	CD Test Test Rating	Overall Bank/State/Multistate Rating
Signature Bank, N.A.	Satisfactory	Outstanding	Satisfactory
State:			
Ohio	Satisfactory	Outstanding	Satisfactory

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Rating Area: A rated area is a state or multi-state metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.

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

Ohio Lending

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2018-2020**

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
Toledo	1,262	285,100	100.0	6,206	14.1	10.7	11.4	10.2	10.8	9.8	36.9	30.6	33.1	38.8	47.9	45.6	0.0	0.0	0.0

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 bank data; 2019 CRA aggregate data, "--" data not available. Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2018-2020**

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
Toledo	1,262	285,100	100.0	6,206	80.6	31.4	46.3	7.0	64.3	12.4	4.3

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 bank data; 2019 CRA aggregate data, "--" data not available. Due to rounding, totals may not equal 100.0%