



PUBLIC DISCLOSURE

June 16, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Home National Bank of Thorntown
Charter Number 5842

117 East Main Street
Thorntown, IN 46071

Office of the Comptroller of the Currency
Indianapolis Field Office
8777 Purdue Road, Suite 105
Indianapolis, IN 46268

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: The Home National Bank (HNB) of Thorntown is rated Satisfactory.

The lending test is rated: Satisfactory.

The Lending Test rating is based on the bank's assessment area (AA) located in the state of Indiana. The major factors that support this rating include:

- A majority of loans are originated inside the bank's AA.
- The bank's loan-to-deposit (LTD) ratio is reasonable.
- Lending to individuals of different income levels and businesses and farms of different sizes is reasonable.
- Geographic distribution of loans in the AA is reasonable.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is reasonable. HNB's quarterly LTD ratio averaged 55.5 percent. This was calculated since the last evaluation using 16 quarters of LTD ratios from March 31, 2016, to December 31, 2019. The LTD ratio fluctuated from a low of 52.8 percent, at June 30, 2019, to a high of 59.3 percent, at September 30, 2017. The LTD ratio includes a notable level of public funds. If the ratios are adjusted for the public funds, the average increases from 55.5 percent to 69.1 percent.

The OCC compared HNB's LTD ratio to three other banks that are similarly situated, with assets ranging from \$412.8 million to \$619.0 million. These banks' ratios averaged between 84.5 percent and 90.1 percent.

Lending in Assessment Area

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

The bank originated and purchased 66.1 percent of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	87	66.4	44	33.6	131	10,241	56.6	7,858	43.4	18,098
Small Business	13	65.0	7	35.0	20	1,327	76.2	415	23.8	1,742
Small Farm	13	65.0	7	35.0	20	2,591	58.8	1,815	41.2	4,406
Total	113	66.1	58	33.9	171	14,159	58.4	10,088	41.6	24,246

Description of Institution

HNB is a full-service, intrastate bank wholly owned by Home National Corporation, a one-bank holding company, headquartered in Thorntown, Indiana. At December 31, 2019, HNB reported total assets of \$116.6 million and \$11.2 million in tier 1 capital. HNB opened a loan production office (LPO) within the AA (Frankfort, Indiana) in June 2019. The OCC did not consider lending activity of the LPO due to the limited time it was operational and low loan volume. The location did not accept cash transactions during the evaluation period. No merger or acquisition activity occurred since the last CRA evaluation.

The bank offers traditional banking products and services at its main office and one branch location in the state of Indiana. The bank has an automated teller machines (ATMs) located at each HNB location. The ATMs do not take deposits. In addition to its branch and ATMs, HNB's delivery channels include internet, mobile, and telephone banking. HNB's primary business strategy focuses on home mortgage, small farm, and small business loans.

HNB's AA encompasses five census tracts (CTs) in Boone County. Both bank locations are in middle-income CTs.

At December 31, 2019, the bank's loan portfolio totaled \$59.2 million and represented 50.8 percent of total assets. See the table below for the loan portfolio breakdown:

Loan Portfolio Composition			
Loan Category	Amount (\$000's)	Percent of Total Loans	Percent of Total Assets
Residential Loans	\$ 30,114	50.9%	25.8%
Commercial Loans	\$ 16,615	28.1%	14.3%
Agricultural Loans	\$ 9,419	15.9%	8.1%
Consumer Loans	\$ 2,777	5.1%	2.6%
Other	\$ 261	0.0%	0.0%
Total Loan Portfolio	\$ 59,186	100.0%	50.8%

Source: Call Report as of December 31, 2019

HNB does not have any legal, financial, or other factors that would impede its ability to meet credit needs in the AA. The bank received a "Satisfactory" rating at its previous CRA evaluation, dated February 8, 2016.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The OCC evaluated HNB using the Small Bank CRA procedures to assess its record of meeting the credit needs of its community, which includes a Lending Test. The evaluation period for this review is February 9, 2016, through December 31, 2019. Based on the number of loans and dollar volume of lending, HNB's primary lending products are home mortgage, farm, and business loans. Home mortgage loans include home purchase, home refinance, and home improvement loans. For home mortgage loans, examiners verified the integrity and utilized the 2017, 2018, and 2019 data reported by the bank under

the requirements of the Home Mortgage Disclosure Act (HMDA). For farm and business loans, examiners randomly selected a sample of each loan type originated during 2017, 2018, and 2019 to gather pertinent data.

Selection of Areas for Full-Scope Review

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

Ratings

HNB’s overall rating is a blend of the state ratings, and where applicable, multistate ratings. The OCC placed more weight on the bank’s performance for farm and business loans, given the number and dollar volume of lending during the evaluation period and the bank’s business strategy.

Loan Category	Amount (\$000s)	Percent of Total
Farm	\$42,084	37.6%
Business	\$42,067	37.6%
Residential	\$21,580	19.3%
Consumer	\$ 6,184	5.5%
Total	\$111,915	100.0%

The MMSA rating and state ratings are based on performance in all bank AAs. Refer to the “Scope” section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

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

The OCC has not identified that this institution (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 Indiana

CRA rating for the State of Indiana: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- A reasonable geographic distribution of loans.
- A reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes.

Description of Institution's Operations in Indiana

HNB has one AA within the state of Indiana rating area. Please refer to the *Description of Institution* section for additional details. Based on this footprint, the bank has one AA, the northern portion of Boone County located within the Indianapolis-Carmel-Anderson MSA. The AA meets the requirements of the regulation and does not arbitrarily exclude low- or moderate-income (LMI) geographies. There was one moderate-income CT in the AA. During the evaluation period, no CTs were designated as low-income.

According to the June 30, 2019 FDIC Deposit Market Share Report, the bank had \$105.0 million in deposits, for a market share of 10.0 percent. HNB ranked fourth out of the eleven FDIC-insured depository institutions operating in the AA. The top three depository institutions (PNC Bank, JPMorgan Chase Bank, and State Bank of Lizton) accounted for 49.2 percent of total deposits in the AA.

Farms in the AA totaled 142 with 96.5 percent being farms with gross annual revenues of \$1.0 million or less based on 2019 Dun and Bradstreet (D&B) data. Eight, or 5.6 percent, of small farms were in the moderate-income CT, which limits the lending opportunities. According to the 2015 American Community Survey (ACS) US Census, the top lenders were John Deere Financial with 34.8 percent and Chase Bank USA, NA with 21.7 percent. Both institutions are significantly larger than HNB.

Competition for home mortgage loans in HNB's AA is strong. Based on 2019 Peer Mortgage Data, the top lenders were Ruoff Home Mortgage with 5.6 percent and Huntington National Bank with 5.4 percent. Both institutions are significantly larger than HNB. The bank ranked twelfth out of 149 lenders operating in the AA. According to the 2015 ACS US Census, the number of owner-occupied housing units totaled 2,661, and there were 3,090 LMI families in the AA.

According to the Bureau of Labor Statistics, unemployment in Boone County was 2.1 percent in December 2019. The December 2019 state unemployment rate was 3.2 percent and the national unemployment rate was 3.5 percent. According to the 2015 ACS US Census, 8.6 percent of households were below the poverty level.

Industries driving the local economy include transportation and warehousing services, and manufacturing. The largest employers in the area include the Amazon.com, Inc., Witham Hospital, and

Hendrickson Commercial Vehicle Systems. Many residents commute to the Indianapolis metro area for employment.

One new community contact was performed for this evaluation. The contact noted HNB has been very involved in supporting lending for small farms and small businesses. The community-based development contact stated an opportunity for banks exists through their new student loan assistant program, designed to incent college graduates to live and work in Boone County.

Indianapolis-Carmel-Anderson MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Thorntown						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	5	0.0	20.0	80.0	0.0	0.0
Population by Geography	25,752	0.0	22.3	77.7	0.0	0.0
Housing Units by Geography	11,309	0.0	23.5	76.5	0.0	0.0
Owner-Occupied Units by Geography	7,276	0.0	20.8	79.2	0.0	0.0
Occupied Rental Units by Geography	3,077	0.0	29.3	70.7	0.0	0.0
Vacant Units by Geography	956	0.0	25.4	74.6	0.0	0.0
Businesses by Geography	1,637	0.0	19.1	80.9	0.0	0.0
Farms by Geography	142	0.0	5.6	94.4	0.0	0.0
Family Distribution by Income Level	7,275	18.3	24.2	24.8	32.7	0.0
Household Distribution by Income Level	10,353	22.4	17.4	21.1	39.1	0.0
Median Family Income MSA - 26900 Indianapolis-Carmel-Anderson, IN MSA		\$66,803	Median Housing Value			\$124,018
			Median Gross Rent			\$700
			Families Below Poverty Level			4.5%
<i>Source: 2015 ACS Census and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Indiana

The bank has only one AA, Boone County in the Indianapolis-Carmel-Anderson MSA. The OCC performed a full-scope review of the AA.

Refer to the table in Appendix A: Scope of the Examination for additional information.

LENDING TEST

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

Conclusions for Areas Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the state of Indiana is reasonable. The geographic distribution of home mortgage loans and small loans to businesses and small farms is reasonable. The borrower distribution of home mortgage loans and small business loans is reasonable. The borrower distribution of small farms is more than reasonable. The OCC did not identify any conspicuous lending gaps.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

The geographic distribution of home mortgage loans is reasonable.

HNB's percentage of loans in the moderate-income CT was above the percentage of owner-occupied housing units and below aggregate lending. The bank's smaller asset size, limited number of owner-occupied units in the moderate-income CT, and strong competition makes it more difficult to reach families in the moderate CT.

Refer to Table O in the state of Indiana 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.

Small Loans to Businesses

The geographic distribution of small loans to businesses is reasonable.

The AA had one moderate-income CT. The bank's percentage of loans in the moderate-income CT was below the percentage of small businesses (businesses with gross annual revenues of \$1.0 million or less) and the aggregate lending in those geographies. Based on the strong level of competition within the area for the low number of businesses in the CT (313 businesses), this distribution is reasonable.

Refer to Table Q in the state of Indiana 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.

Small Loans to Farms

The geographic distribution of small loans to farms is reasonable.

The AA had one moderate-income CT. The bank's percentage of loans in the moderate-income CT was below the percentage of small farms (farms with gross annual revenues of \$1.0 million or less) and the

aggregate. Based on the strong level of competition within the area for the low number of farms in the CT (eight farms), this distribution is reasonable.

Refer to Table S in the state of Indiana 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.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

The borrower distribution of home mortgage loans is reasonable.

The distribution of the bank's lending to moderate- and low-income borrowers was below the percentage of moderate- and low-income families and aggregate lending. HNB reported a high number of not available income borrowers related to non-owner occupied home mortgage lending, concluding some of the families could be moderate- and low-income families. The limited number of families and the strong lender competition in the AA makes it more difficult to lend to LMI families.

Refer to Table P in the state of Indiana 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.

Small Loans to Businesses

The borrower distribution of small loans to businesses is reasonable.

The distribution of the bank's lending to small businesses was below the percentage of small businesses. Based on the strong level of competition within the area for the limited number of small businesses in the CT, this distribution is reasonable.

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

Small Loans to Farms

The borrower distribution of small loans to farms is more than reasonable. The distribution of the bank's lending to small farms is above the percentage of small farms.

Refer to Table T in the state of Indiana 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.

Responses to Complaints

During the evaluation period, HNB did not receive any complaints related to its performance in helping meet the credit needs of the AA.

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:	(02/09/2016 to 12/31/2019)	
Bank Products Reviewed:	Home mortgage, business, farm	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Indiana		
Indianapolis-Carmel-Anderson, IN MSA	Full-scope	Boone County

Appendix B: Summary of MMSA and State Ratings

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

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

Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																2017-19		
	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	% 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
Thorntown	87	10,241	100.0	0.0	0.0	0.0	20.8	21.8	24.8	79.2	78.2	75.2	0.0	0.0	0.0	0.0	0.0	0.0
Total	87	10,241	100.0	0.0	0.0	0.0	20.8	21.8	24.8	79.2	78.2	75.2	0.0	0.0	0.0	0.0	0.0	0.0

*Source: 2015 ACS U.S Census; 01/01/2019 - 12/31/2019 Bank Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																2017-19		
	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate
Thorntown	87	10,241	100.0	18.3	6.9	11.1	24.2	19.5	28.8	24.8	23.0	21.1	32.7	26.4	23.1	0.0	24.1	15.9
Total	87	10,241	100.0	18.3	6.9	11.1	24.2	19.5	28.8	24.8	23.0	21.1	32.7	26.4	23.1	0.0	24.1	15.9

*Source: 2015 ACS U.S Census; 01/01/2019 - 12/31/2019 Bank Data, "--" data not available.
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													2017-19	
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$(000)	% of Total	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Thorntown	20	\$1,758	100.0	0.0	0.0	19.1	15.0	80.9	85.0	0.0	0.0	0.0	0.0	
Total	20	\$1,758	100.0	0.0	0.0	19.1	15.0	80.9	85.0	0.0	0.0	0.0	0.0	

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank 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										2017-19	
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	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Thorntown	20	1,758	100.0	1,637	81.1	75.0	5.7	20.0	13.2	5.0	
Total	20	1,758	100.0	1,637	81.1	75.0	5.7	20.0	13.2	5.0	

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; "--" data not available.
Due to rounding, totals may not equal 100.0*

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography													2017-19	
Assessment Area:	Total Loans to Farms			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$(000)	% of Total	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	
Thorntown	20	3,708	100.0	0.0	0.0	5.6	0.0	94.4	100.0	0.0	0.0	0.0	0.0	
Total	20	3,708	100.0	0.0	0.0	5.6	0.0	94.4	100.0	0.0	0.0	0.0	0.0	

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; "--" data not available.
Due to rounding, totals may not equal 100.0*

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-19	
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	% Farms	% Bank Loans	% Farms	% Bank Loans		
Thorntown	20	3,708	100.0	142	96.5	100.0	1.4	0.0	2.1	0.0		
Total	20	3,708	100.0	142	96.5	100.0	1.4	0.0	2.1	0.0		

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; "--" data not available.
Due to rounding, totals may not equal 100.0*