



PUBLIC DISCLOSURE

July 6, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First Financial Bank, National Association
Charter Number: 47

One First Financial Plaza
Terre Haute, IN 47808

Office of the Comptroller of the Currency

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: This institution is rated **Satisfactory**.

The following table indicates the performance level of First Financial Bank, N.A. with respect to the Lending, Investment, and Service Tests:

Performance Levels	First Financial Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X		
High Satisfactory			X
Low Satisfactory		X	
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 a combination of multistate metropolitan statistical area (MMSA) and state rating areas. The primary factors in the Outstanding Lending Test was the performance in the states of Indiana and Illinois. FFB had excellent Lending Activity in all rating areas, with the exception of the Tennessee AAs, which were considered adequate. Community Development (CD) lending in the full-scope areas in the state of Indiana had a positive impact on the overall Lending Test rating.
- The Investment Test rating is based on a combination of MMSA and state rating areas. The primary factors in the Investment Test is the Low Satisfactory performance in all rating areas. There was an adequate level of qualified CD investments when compared to allocated tier 1 capital. Bank CD investments were responsive to community needs.
- The Service Test rating is based on a combination of MMSA and state rating areas. The primary factors in the High Satisfactory rating was the good level of CD services in the states of Indiana and Illinois. CD services were responsive to community needs.

Lending in Assessment Area

A substantial majority of the bank's loans are in its assessment areas (AAs).

The bank originated and purchased 88.5 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Table D - 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										
2018	1,196	94.5	69	5.5	1,265	112,411	88.0	15,347	12.0	127,758
2019	1,199	87.8	166	12.2	1,365	121,927	79.3	31,860	20.7	153,787
2020	1,487	83.6	292	16.4	1,779	182,539	74.2	63,445	25.8	245,984
Subtotal	3,882	88.0	527	12.0	4,409	416,878	79.0	110,652	21.0	527,530
Small Business										
2018	945	89.2	115	10.8	1,060	106,295	81.7	23,824	18.3	130,119
2019	884	88.1	119	11.9	1,003	115,918	82.6	24,398	17.4	140,316
2020	2,224	88.7	282	11.3	2,506	205,229	83.9	39,427	16.1	244,656
Subtotal	4,053	88.7	516	11.3	4,569	427,442	83.0	87,649	17.0	515,091
Small Farm										
2018	443	88.4	58	11.6	501	50,986	88.7	6,509	11.3	57,495
2019	456	89.8	52	10.2	508	56,629	89.8	6,456	10.2	63,085
2020	498	89.4	59	10.6	557	53,524	88.7	6,796	11.3	60,320
Subtotal	1,397	89.2	169	10.8	1,566	161,139	89.1	19,761	10.9	180,900
Total	9,332	88.5	1,212	11.5	10,544	1,005,459	82.2	218,062	17.8	1,223,521
<i>Source: Bank Data Due to rounding, totals may not equal 100.0%</i>										

Description of Institution

First Financial Bank, N.A. (FFB or bank) is a federally chartered national bank headquartered in Terre Haute, IN. FFB is the oldest national bank in Indiana and the fifth oldest in the United States. As of December 31, 2020, the bank had total assets of \$4.4 billion and tier 1 capital of \$470.5 million.

FFB is wholly owned subsidiary of First Financial Corporation (FFC), also headquartered in Terre Haute, IN. FFC is a publicly traded corporation on the NASDAQ stock exchange under the symbol "THFF." FFC owns and operates FFB Risk Management Co., Inc., a private insurance company. FFC is also affiliated with the Morris Plan Company of Terre Haute, a finance company for consumer loans, and First Chanticleer Company, a real estate holding company. FFB has two investment subsidiaries, Portfolio Management Specialist A and Portfolio Management Specialist B. FFB also has operating subsidiaries, which hold certain bank assets, Global Port. Ltd. Partners and First Financial Real Estate, LLC. These subsidiaries' activities are not considered in the bank's CRA performance.

The holding company acquired HopFed Bancorp, Inc. (HFBC on NASDAQ) and its banking subsidiary, Heritage Bank (total assets of \$900 million), on July 27, 2019. Historically, growth has been through acquisitions of smaller community banks.

FFB is a multistate bank that currently operates 73 branches, 7 remote drive ups, and 65 deposit-taking automated teller machines (ATMs). FFB has 12 AAs located in Illinois, Indiana, Kentucky, and Tennessee. Following the acquisition of Heritage Bank in July 2019, the bank expanded from 66 branches to 82 banking centers in west-central Indiana, east-central Illinois, Kentucky, and Tennessee. The AAs are further detailed in the Selection of Areas for Full-Scope Review section below.

The bank's market strategy is to provide a traditional mix of loan and deposit products, as well as asset management services. They offer a full range of agricultural loans, business loans, conventional mortgages, home improvement loans, and consumer loans. They also offer Federal Housing Administration (FHA) and U.S. Department of Veteran Affairs (VA) mortgage loans. In addition to the bank's branch network and ATMs, they offer internet banking, mobile banking, banking by telephone, and banking by mail. The bank's goal is to be the premier financial services organization and provide the highest quality customer service in their market areas.

According to the June 30, 2020, Federal Deposit Insurance Company (FDIC) Deposit Market Share Report, FFB has deposits of \$3.5 billion. In the state of Illinois, the bank has a deposit market share of 2.6 percent and is ranked sixth out of 89 financial institutions. In the state of Indiana, the bank has a deposit market share of 15.9 percent and is ranked third out of 33 financial institutions. In the state of Kentucky, the bank has a deposit market share of 13.9 percent and is ranked second out of 15 financial institutions. In the state of Tennessee, the bank has a deposit market share of 18.6 percent and is ranked third of six financial institutions. In the Kentucky-Tennessee MMSA, the bank has a deposit market share of 5.9 percent and is ranked eighth out of 15 financial institutions.

As of March 31, 2021, the bank reported total loans of \$2.5 billion, representing 54.7 percent of total assets. The loan portfolio consisted of 59.8 percent commercial, 16.8 percent residential real estate loans, 14.6 percent consumer loans and 8.8 percent agricultural loans.

FFB makes use of bank-wide flexible loan programs to help low- and moderate-income (LMI) borrowers achieve homeownership through programs that provide reduced down payment options and lower closing costs through FHA, U.S. Department of Agriculture (USDA) Rural Development, and Freddie Mac Home Possible programs. During the review period, the bank originated 29 FHA loans totaling \$3.7 million. The bank originated 135 USDA Rural Development loans, totaling \$9.3 million. The bank originated \$12 million in Freddie Mac Home Possible loans.

The bank also helps small businesses through the participation in U.S. Small Business Administration (SBA) programs. During the evaluation period, the bank originated 11 traditional SBA loans totaling \$4.8 million. The bank also received positive consideration for its response to the COVID-19 pandemic in 2020 through the origination of loans via the SBA Paycheck Protection Program (PPP), which helped to stabilize small businesses and communities in the AAs and statewide areas. The bank originated 1,734 PPP loans totaling \$169.8 million in 2020. The bank originated eight PPP loans totaling \$2.4 million in the regional and nationwide area.

As part of the bank's overall COVID-19 pandemic response, FFB began accepting hardship requests and mitigating relief based on individual customer circumstances. These efforts included loan extensions with a waiver of fees and collection rewrites. In addition, retail fees were waived on customer request based upon financial hardship. These fees included overdraft fees, service fees, early withdrawal fees, and interest penalty waivers. Since March 26, 2020, the bank has waived \$444.69 in checking account fees and \$5,671.99 in non-sufficient funds and overdraft fees, and also provided debt relief for 1,545

loan customers with a total loan balance of approximately \$305 million for commercial, installment and mortgage borrowers.

With lobby closures, branches were conducting new deposit account relationships and new loan relationships through drive-up facilities and also increased services available through online channels. The bank received positive consideration for these activities in response to the COVID-19 pandemic.

There were no legal or financial factors impeding the bank's ability to help meet credit needs in its AAs during the evaluation period. First Financial Bank's CRA performance was rated "Satisfactory" in the previous public evaluation dated June 2, 2018.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This Performance Evaluation (PE) assesses the bank's performance under the large bank Lending, Investment, and Service Tests. For the Lending Test, the OCC analyzed home mortgage loans the bank reported under the Home Mortgage Disclosure Act (HMDA), as well as small loans made to businesses and small loans to farms the bank reported under the CRA. All loan types were reviewed for the period of January 1, 2018, through December 31, 2020. Primary loan products, for purposes of this review, are products in which the bank originated at least 20 loans within an AA during one or more of the analysis periods within the overall evaluation period. The OCC did consider multifamily loans meeting the CD definition as part of the evaluation of CD lending.

In evaluating the geographic distribution and borrower income criteria under the Lending Test for HMDA and CRA, 2018 through 2020 data was analyzed and aggregated unless noted in the Scope of Evaluation section for the state. There were changes to the U.S. Census 2015 American Community Survey (ACS), which impacted the non-metropolitan statistical area (MSA) and the Terre Haute MSA in the state of Indiana. The Terre Haute MSA will have a separate analysis period for 2018 and a combined analysis for 2019-2020 data under the Lending Test. In addition to ACS changes, the IN non-MSA had a branch closure in 2019 that affected the AA. The IN non-MSA will have a separate analysis for each year: 2018, 2019, and 2020. Conclusions will be discussed in the appropriate sections of the PE. Bank and branch deposit data is as of June 30, 2020, based on information from the FDIC. The distribution of bank branches is compared to U.S. Census 2015 ACS population estimates.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AA(s) 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.

Ratings

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings.

For the overall conclusions, the OCC gave the most weight to the state of Indiana. The state of Indiana received the most weight given the majority of deposits, home mortgage loan originations, home mortgage loan volume, small business loan originations, small business loan volume, CD investments, and bank branches are in Indiana. By number of loans originated, Indiana represents 68.7 percent of lending. The state of Indiana holds 55.5 percent of total deposits and 37.5 percent of total branches. Indiana is also home to FFB's headquarters.

The MMSA 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 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.

Multistate Metropolitan Statistical Area Rating

Clarksville TN-KY MMSA

CRA rating for the Clarksville TN-KY MMSA¹: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending activity levels reflect excellent responsiveness to community credit needs.
- The bank exhibits an excellent geographic distribution of loans in its AA. The bank exhibits good distribution of loans among individuals of different income levels and business of different sizes.
- The institution made an adequate level of CD loans.
- The institution has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors. The institution exhibits adequate responsiveness to credit and community economic development needs.
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution's AAs.
- The institution provides an adequate level of CD services.

Description of Institution's Operations in Clarksville TN-KY MMSA

The Clarksville Tennessee-Kentucky MMSA is comprised of the counties of Christian and Trigg in Kentucky and Montgomery in Tennessee. This AA was added in October 2019 as part of the Heritage Bank merger. The OCC took into consideration the COVID-19 pandemic and FFB's limited presence in this AA, which restricted the bank's efforts in lending and community development activities. The AA meets the requirement of the regulation and does not arbitrarily exclude LMI geographies.

According to the 2015 U.S. Census data, the AA consists of 63 census tracts (CTs), of which three are low-income and 13 are moderate-income. Based on the June 30, 2020, FDIC Deposit Market Share data, FFB had \$264.8 million in deposits in the MMSA which represented 7.6 percent of the bank's total deposits. FFB was ranked eight out of 15 banks with a market share of 5.8 percent. Primary competitors within the AA are the following: Planters Bank, Inc., which ranked first in deposit market share

¹ 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.

(19.8 percent) with seven branches; F&M Bank, which ranked second in deposit market share (12.3 percent) with eight branches; and Reliant Bank, which ranked third in deposit market share (9.72 percent) with five offices.

FFB provides a full range of loan and deposit products and services in the state. The bank operates seven full-service branches: two are located in LMI CTs, three are located in middle-income CTS, one is located in an upper-income CT, and one is located in an unknown census tract. In addition, the bank has 26 ATMs throughout the AA. The branches represent 9.5 percent of the bank's total branch network.

The bank made 2.1 percent of its loan originations and purchases compared to total bank loans during the evaluation period in the AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: KY-TN MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	63	4.8	20.6	47.6	17.5	9.5
Population by Geography	274,389	3.4	16.7	57.0	20.9	2.0
Housing Units by Geography	112,748	3.4	17.3	58.9	19.7	0.6
Owner-Occupied Units by Geography	56,295	1.9	9.6	60.3	27.9	0.3
Occupied Rental Units by Geography	41,474	5.3	27.1	55.9	10.9	0.8
Vacant Units by Geography	14,979	3.8	19.6	62.2	13.4	1.0
Businesses by Geography	14,935	6.2	15.3	49.2	25.6	3.7
Farms by Geography	755	2.4	4.8	57.0	35.2	0.7
Family Distribution by Income Level	70,077	20.4	18.0	21.2	40.4	0.0
Household Distribution by Income Level	97,769	22.3	16.6	19.6	41.5	0.0
Median Family Income MSA - 17300 Clarksville, TN-KY MSA		\$53,979	Median Housing Value			\$127,765
			Median Gross Rent			\$844
			Families Below Poverty Level			13.1%
<i>Source: 2015 ACS and 2020 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>						

Employment Factors

According to the U.S. Bureau of Labor and Statistics, as of March 2021, the unemployment rate in the Clarksville, TN-KY MMSA was 5.6 percent, up from 4.5 percent in January of 2018. The national unemployment rate, as of March 2021, was 6.0 percent; the unemployment rate for the state of Kentucky was 5.0 percent and 5.1 percent for the state of Tennessee.

Housing Characteristics

According to the 2015 U.S. Census, there were 112,748 total housing units in the AA. Owner-occupied units represented 49.9 percent of the total housing units in the AA, and 36.8 percent were rental occupied units. There were 3.4 percent of all owner-occupied units and 5.3 percent of renter-occupied units located in low-income CTs. There were 17.0 percent of all owner-occupied units and 27.3 percent of renter-occupied units located in moderate-income CTs.

There were 92,643 single family (1-4 unit) homes and 12,121 multifamily (five plus unit) housing units in the AA. The distribution of housing units in low-income CTs was 75.9 percent single family and 12.0 percent multifamily. The distribution of housing units in moderate-income CTs was 76.7 percent single family and 18.1 percent of multifamily.

Community Contact

The OCC utilized one community contact with a local small business development organization that supports business development in the AA. The local organization stated that local banks are heavily involved with the community and engaged in meeting the needs of the community. The organization stated that banks should continue to be engaged and provide loans to businesses and individuals.

Scope of Evaluation in Clarksville TN-KY MMSA

The Clarksville TN-KY MMSA is analyzed as a full-scope AA. This is the only AA in the rating area. The OCC gave more weight to the bank's lending of small loans to businesses. Within the MMSA, small loans to businesses accounted for 56.7 of total loan originations.

An analysis was not performed on small farm lending data in the MMSA as there were too few originations for a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN Clarksville TN-KY MMSA

LENDING TEST

The bank's performance under the Lending Test in the Clarksville TN-KY MMSA is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the Clarksville TN-KY MMSA is good.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Clarksville TN-KY MMSA	80	127	17	2	226	100.0	100.0

*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
Clarksville TN-KY MMSA	12,808	14,940	1,458	3,493	32,699	100.0	100.0

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

According to 2019 peer mortgage data, FFB had a 0.7 percent market share of home mortgage loan originations. The market share of home mortgage loan originations was weaker than their deposit market share. The market share of home mortgage loan originations ranked 30th out of 369 lenders in the MMSA. The market share of home mortgage loan originations ranked in the top 8.1 percent. The market share of home mortgage loan originations was weaker than their deposit market share ranking. The OCC gave consideration to the fact that competition for loans is stronger than competition for deposits. The five largest mortgage lenders have captured 34.5 percent of the market.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the “MMSA” 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 geographic distribution of home mortgage loans in LMI geographies is excellent. The proportion of home mortgage loans exceeded the percentage of owner-occupied housing units in low-income CTs and aggregate industry distribution. The proportion of home mortgage loans exceeded the percentage of owner-occupied housing units in moderate-income geographies and aggregate industry distribution.

Small Loans to Businesses

Refer to Table Q in the “MMSA” 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 geographic distribution of small loans to businesses in LMI geographies is excellent. The proportion of small loans to businesses exceeded the percentage of business in low-income CTs and the aggregate

industry distribution. The proportion of small loans to businesses exceeded the percentage of businesses in moderate-income CTs and aggregate industry distribution.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. The OCC reviewed summary reports, maps, and analyzed the bank's home mortgage and small business 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 good distribution of loans among individuals of different income levels and business and farms of different sizes.

Home Mortgage Loans

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

The borrower distribution of home mortgage loans to LMI borrowers is excellent. The proportion of loans to low income borrowers was significantly below the percentage of low-income families but exceeded the aggregate industry distribution. The proportion of loans to moderate-income borrowers exceeded the percentage of moderate-income families and the aggregate industry distribution. The OCC took into consideration the high poverty level in this AA, making it difficult for low-income individuals to qualify for a mortgage loan. There are 13.1 percent of families living below the poverty level.

Small Loans to Businesses

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

Borrower distribution of small loans to businesses by revenue is poor. The proportion of loans to small businesses was well below the percentage of small businesses and significantly below the aggregate industry distribution.

Community Development Lending

The institution made an adequate level of CD loans. The OCC considered in context that this AA is relatively new to the bank.

The Lending Activity Tables, shown above, 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.

The bank originated two CD loans totaling \$3.5 million, representing 9.7 percent of allocated tier 1 capital. The CD lending activity included two PPP loans.

In the statewide area, one PPP loan totaling \$1.1 million was originated.

Product Innovation and Flexibility

The institution makes no use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank does participate in flexible loan programs. The flexible programs were considered in the overall performance and are described in the Description of Institution section. In response to the COVID-19 pandemic, the bank originated 108 PPP loans totaling \$8.2 million in this AA.

INVESTMENT TEST

The institution's performance under the Investment Test in Clarksville TN-KY MMSA is rated Low Satisfactory.

Based on a full-scope review, the institution's performance in the Clarksville TN-KY MMSA is adequate.

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

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

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)
Clarksville TN-KY MSA	1	831	0	0	1	100.0	831	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.

FFB made one investment, totaling \$831 thousand, representing 2.3 percent of allocated tier 1 capital. This sole investment is comprised of the current outstanding balance of one prior period investment used to help revitalize or stabilize a distressed middle-income CT.

SERVICE TEST

The institution's performance under the Service Test in Clarksville TN-KY MMSA is rated High Satisfactory.

Based on a full-scope review, the institution's performance in the Clarksville TN-KY MMSA is good.

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# 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
Clarksville TN-KY MSA	100.0	7	9.7	14.3	14.3	42.9	14.3	3.4	16.7	57.0	20.9

FFB has seven branches in the AA, with one in a low-income CT and one in a moderate-income CT. The percentage of branches located in low-income CTs exceeds the percentage of population residing in low-income CTs while the percentage of branches in moderate-income CTs is near to the percent of population residing in moderate-income CTs. One branch is near a low-income CT and two are near moderate-income CTs.

The bank complements its branches with ATMs, internet banking, mobile banking, banking by telephone, and banking by mail. The bank has 26 ATMs in the AA, of which six are located in low- or moderate-income CTs.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Clarksville TN-KY MSA	0	0	0	0	0	0

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals.

Branches in the AA are open on Saturdays.

Community Development Services

The institution provides an adequate level of CD services.

CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported a reasonable number of CD services, consistent with its capacity and expertise to conduct specific activities.

FFB employees from various lines of business provided technical assistance to seven different CD organizations totaling 246 hours during the evaluation period. FFB staff served on boards and committees for organizations that provide community services targeted to LMI individuals and families, and economic development.

Notable examples include:

- An employee serves as a board member for an organization that provides community services and affordable housing. The organization promotes adult educational programs, budget counseling, job readiness training, and assistance with housing, utilities, and medication.
- An employee presented monthly budgeting classes to LMI community members in the North Clarksville area.
- An employee serves as a board member and is on the Steering Committee for an Economic Development Counsel the promotes job creation in the area.

State Rating

State of Illinois

CRA rating for the State of Illinois: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending activity levels reflect excellent responsiveness to community credit needs.
- The bank exhibits an excellent geographic distribution of loans in its AA. The bank exhibits excellent distribution of loans among individuals of different income levels and business and farms of different sizes.
- The institution has made an adequate level of CD loans.
- The institution has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors. The institution exhibits adequate responsiveness to credit and community economic development needs.
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution's AAs.
- The institution provides an adequate level of CD services.

Description of Institution's Operations in Illinois

FFB has four AAs within the state of Illinois. These AAs include the Bloomington, IL MSA; Champaign-Urbana, IL MSA; Danville, IL MSA; and combined non-MSA. Refer to Appendix A for the geographies that make up the AAs. All state of Illinois AAs met the requirements of CRA regulations and do not arbitrarily exclude any LMI tracts.

FFB offers a full range of loan and deposit products and services through 32 branches and 36 ATMs in the state of Illinois. According to the June 30, 2020, FDIC Market Share Report, FFB held \$820.8 million in statewide deposits and ranked sixth in the state, representing 2.6 percent market share. During the evaluation period, 23.5 percent of deposits and 25.68 percent of HMDA and CRA small business loan originations were in the state of Illinois.

IL Non-MSA

The Illinois non-MSA is comprised of the Illinois counties of Clark, Coles, Crawford, Cumberland, Edgar, Franklin, Jasper, Jefferson, Lawrence, Livingston, Marion, Richland, and Wayne counties. During the evaluation period, Coles, Franklin, Lawrence, Richland and Wayne counties were included on the FFIEC List of Distressed or Underserved Nonmetropolitan Middle-Income Geographies. These

counties were either distressed due to poverty, unemployment, or population loss and underserved due to remote rural location.

Strong competition exists for financial services within the IL non-MSA. According to the June 30, 2020, FDIC Deposit Market Share Report, FFB ranked fourth out of 55 depository financial institutions in the AA, with \$449.6 million in deposits and 5.4 percent market share. FFB has 19 branches and 21 ATMs. The three largest competitors are: First Mid Bank & Trust, Peoples National Bank, and Bank of Pontiac which have total deposits totaling \$2.3 billion, representing 27.5 percent of total deposit market share.

FFB deposits within the IL non-MSA accounts for 12.9 percent of total deposits. The primary lending focus was on home mortgage loans. During the evaluation period, FFB originated 1,370 loans totaling \$119.2 million within the IL non-MSA. Home mortgage loans in the IL non-MSA represented 59.4 percent of the total number of home mortgage originations and 40.3 percent of the total loan volume in the state of Illinois. Small loans to businesses in the IL non-MSA represented 50.1 percent of the total number of small business loan originations.

The OCC utilized a rural small business forum for the community contact. The discussion includes issues common to the entire AA. Some initiatives included creating classes in high schools to develop entrepreneurs, building infrastructure for telecommunications, and developing action plans to improve credit scores.

Table A – Demographic Information of the Assessment Area

Assessment Area: IL Non-MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	93	1.1	21.5	66.7	9.7	1.1
Population by Geography	331,280	0.5	20.3	66.5	11.1	1.6
Housing Units by Geography	148,607	0.5	21.1	67.1	10.6	0.7
Owner-Occupied Units by Geography	96,176	0.2	17.1	70.9	11.6	0.1
Occupied Rental Units by Geography	35,303	1.1	29.1	57.7	10.0	2.1
Vacant Units by Geography	17,128	1.1	26.4	64.7	6.4	1.4
Businesses by Geography	17,783	1.9	25.3	60.3	12.1	0.4
Farms by Geography	2,014	0.1	7.7	79.0	13.1	0.0
Family Distribution by Income Level	85,245	22.4	18.1	21.6	37.9	0.0
Household Distribution by Income Level	131,479	26.1	16.2	17.6	40.2	0.0
Median Family Income Non-MSAs - IL		\$59,323	Median Housing Value			\$84,921
			Median Gross Rent			\$600
			Families Below Poverty Level			11.8%

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.

Champaign-Urbana MSA

The Champaign-Urbana MSA is comprised of the Illinois county of Champaign. Strong competition exists for financial services within the Champaign-Urbana MSA. According to the June 30, 2020, FDIC Market Share Report, FFB ranked 14th out of 30 depository financial institutions in the AA, with \$85.7 million in deposits and 1.3 percent market share. FFB has 4 branches and 4 full-service ATMs. The largest competitors are: Busey Bank, JP Morgan Chase Bank, PNC Bank, CIBM Bank, and Bank Champaign which have total deposits of \$4.8 billion, representing 72.8 percent of total deposit market share.

FFB deposits within the Champaign-Urbana MSA accounts for 2.5 percent of total deposits. The primary lending focus was on home mortgage loans. During the evaluation period, FFB originated 232 loans totaling \$47.4 million within the Champaign-Urbana MSA. Home mortgage loans in the Champaign-Urbana MSA represented 13.3 percent of the total number of home mortgage originations and 53.4 percent of the total loan volume in the state of Illinois.

The OCC utilized one community contact with a local small business development organization that supports small and start-up business in the AA. The organization identified the need for outreach to let local businesses know CRA is also about business development. The organization also stated there is a need for CD investment.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Champaign-Urbana MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	43	18.6	16.3	39.5	20.9	4.7
Population by Geography	205,766	14.3	16.8	43.6	20.0	5.4
Housing Units by Geography	88,981	15.1	17.6	46.7	18.7	1.9
Owner-Occupied Units by Geography	43,897	5.5	12.1	57.6	24.7	0.1
Occupied Rental Units by Geography	36,015	25.4	23.1	34.8	12.7	4.0
Vacant Units by Geography	9,069	20.7	22.0	41.6	13.4	2.3
Businesses by Geography	11,865	10.7	18.4	41.6	26.7	2.6
Farms by Geography	622	3.5	6.9	68.0	21.4	0.2
Family Distribution by Income Level	42,424	22.5	16.6	20.4	40.5	0.0
Household Distribution by Income Level	79,912	28.9	14.5	15.2	41.5	0.0
Median Family Income MSA - 16580 Champaign-Urbana, IL MSA		\$70,634	Median Housing Value			\$137,528
			Median Gross Rent			\$838
			Families Below Poverty Level			10.6%
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Illinois

For the state of Illinois, the OCC completed full-scope reviews of the Champaign-Urbana MSA and IL non-MSA. The OCC performed limited-scope reviews of the Bloomington MSA and Danville MSA. The IL non-MSA is weighted more heavily in arriving at the overall conclusions for the state, as the bank’s largest market share of loans and deposits is concentrated in this area. Of the bank’s loans in Illinois, 60.1 percent were originated in the IL non-MSA AA and 10.2 percent in the Champaign-Urbana MSA AA. Of the bank’s deposits in Illinois, 54.8 percent are in the IL non-MSA AA and 10.4 percent in the Champaign-Urbana MSA AA.

An analysis was not performed on small farm lending data in the Champaign-Urbana MSA as there were too few originations for a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Champaign-Urbana MSA and IL non-MSA is good.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Bloomington MSA	56	111	17	6	190	8.1	6.3
Champaign-Urbana MSA	124	108	0	0	232	10.2	10.4
Danville MSA	197	261	36	6	500	21.7	28.5
IL Non-MSA	552	481	337	11	1,381	60.0	54.8

*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* Loans	%State Deposits
Bloomington MSA	8,570	12,039	2,194	1,290	24,093	9.8	6.3
Champaign-Urbana MSA	35,881	11,520	0	0	47,401	20.2	10.4
Danville MSA	21,197	19,179	4,113	5,858	50,347	19.0	28.5
IL Non-MSA	40,277	34,164	44,713	1,780	120,934	51.0	54.8

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

IL Non-MSA

According to 2019 peer mortgage data, FFB had a 3.9 percent market share of home mortgage originations. The market share of home mortgage originations was below their deposit market share. The market share of home mortgage originations ranked sixth out of 279 lenders in the AA. The market share ranking of home mortgage originations was in the top 2.2 percent of all lenders in the AA. The market share ranking of home mortgage originations was slightly weaker than their deposit market share ranking. The five largest mortgage lenders have captured 29.6 percent of the market.

According to 2019 peer small business data, FFB had a 3.0 percent market share of small business loan originations. The market share of small business loan originations was weaker than the deposit market share. The market share of small business loan originations ranked ninth out of 75 lenders in the AA. The market share of small business loan originations ranked in the top 12.0 percent of all lenders. The market share ranking of small business loan originations was weaker than their deposit market share. The five largest small business lenders have captured 52.1 percent of the market.

According to 2019 peer small business data, FFB had a 10.3 percent market share of small farm loan originations. The market share of small farm loan originations was stronger than the deposit market share. The market share of small farm loan originations ranked third out of 29 lenders in the AA. The market share of small farm loan originations ranked in the top 10.3 percent of all lenders. The market share ranking of small farm loan originations was the same as their deposit market share. The five largest small business lenders, including FFB, have captured 69.6 percent of the market.

Champaign-Urbana MSA

According to 2019 peer mortgage data, FFB had a 0.8 percent market share of home mortgage originations. The market share of home mortgage originations was below their deposit market share. The market share of home mortgage originations ranked 28th out of 234 lenders in the AA. The market share ranking of home mortgage originations was in the top 12.0 percent of all lenders in the AA. The market share ranking of home mortgage originations was weaker than their deposit market share ranking. The five largest mortgage lenders have captured 36.6 percent of the market.

According to 2019 peer small business data, FFB had a 0.9 percent market share of small business loan originations. The market share of small business loan originations was slightly weaker than the deposit market share. The market share of small business loan originations ranked 18th out of 70 lenders in the

AA. The market share of small business loan originations ranked in the top 25.7 percent of all lenders. The market share ranking of small business loan originations was slightly weaker than their deposit market share. The five largest small business lenders have captured 58.9 percent of the market.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AA(s).

Home Mortgage Loans

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

IL Non-MSA

The geographic distribution of home mortgage loans in LMI geographies is excellent. The proportion of home mortgage loans equals the percentage of owner-occupied housing units in the low-income CT. The bank's lending in the low-income CT exceeded aggregate lending, as other HMDA reporting institutions did not lend in this CT. The proportion of home mortgage loans exceeded the percentage of owner-occupied housing units and aggregate industry distribution in moderate-income geographies. More weight was given to performance in moderate-income geographies as they contain substantially greater opportunities for lending in both number of CTs and number of owner-occupied housing units than in low-income geographies, which contains only one CT.

Champaign-Urbana MSA

The geographic distribution of home mortgage loans in LMI geographies is excellent. The proportion of home mortgage loans exceeded the percentage of owner-occupied housing units in low-income CTs and the aggregate industry distribution. The proportion of home mortgage loans was below the percentage of owner-occupied housing units in moderate-income CTs and near to the aggregate industry distribution.

Small Loans to Businesses

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

IL Non-MSA

The geographic distribution of small loans to businesses in LMI geographies is excellent. The percentage of small loans to businesses exceeded the percentage of small businesses in low-income CTs and the aggregate lending. The percentage of small loans to businesses was below the percentage of small businesses in moderate-income CTs and near to the aggregate lending.

Champaign-Urbana MSA

The geographic distribution of small loans to businesses in LMI geographies is good. The percentage of small loans to businesses exceeded the percentage of businesses in low-income CTs and the aggregate industry distribution. The percentage of small loans to businesses is significantly below the percentage of businesses in moderate-income CTs and aggregate industry distribution.

Small Loans to Farms

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

IL Non-MSA

The geographic distribution of small loans to farms in LMI geographies is good. The proportion of small loans to farms is below the percentage of farms in the low-income CT. The bank did not make any loans in the low-income CT and there was no aggregate lending in the low-income CT. Consideration was given to the fact that only 0.1 percent of farms are located in the only low-income CT. The proportion of small loans to farms is significantly below the percentage of farms in moderate-income CTs but exceeded the aggregate industry distribution. More weight was given to the performance in moderate-income geographies as opportunities for lending in low-income geographies are significantly limited in both number of low-income CTs and number of farms.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. The OCC reviewed summary reports, maps, and analyzed the bank's home mortgage and small business 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 an excellent 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

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

IL Non-MSA

The borrower distribution of home mortgage loans to LMI borrowers is excellent. The proportion of loans to low-income borrowers was significantly below the percentage of low-income families but exceeded the aggregate industry distribution. The proportion of loans to moderate-income borrowers exceeded the percentage of moderate-income families and the aggregate industry distribution.

Champaign-Urbana MSA

The borrower distribution of home mortgage loans to LMI borrowers is excellent. The proportion of loans to low income borrowers was well below the percentage of low-income families but exceeded the aggregate industry distribution of home mortgage loans to those families. The proportion of loans to moderate-income borrowers exceeded the percentage of moderate-income families and the aggregate industry distribution of loans to those borrowers.

Small Loans to Businesses

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

IL Non-MSA

The borrower distribution of small loans to businesses by revenue is good. The proportion of loans to small businesses is below the percentage of small businesses and exceeded the aggregate industry distribution.

Champaign-Urbana MSA

The borrower distribution of small loans to businesses by revenue is adequate. The proportion of loans to small businesses is well below the percentage of small businesses and near to the aggregate industry distribution.

Small Loans to Farms

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

IL Non-MSA

The borrower distribution of small loans to farms by revenue is excellent. The proportion of loans to small farms is near to the percentage of small farms and significantly exceeded the aggregate industry distribution.

Community Development Lending

The institution has made an adequate level of CD loans. Performance in the IL non-MSA received a greater weighting.

The Lending Activity Tables, shown above, 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.

IL Non-MSA

The bank made an adequate level of CD lending in the AA. The bank originated 11 CD loans totaling \$1.8 million, representing 1.9 percent of allocated tier 1 capital. The CD lending activity included 10 CD loans totaling \$655,000 benefiting revitalization and stabilization, and one PPP loan totaling \$1.1 million.

Champaign-Urbana MSA

The bank made few, if any, CD loans. The bank did not originate any qualifying CD loans in the AA, which had a significantly negative impact on the CD lending performance.

Product Innovation and Flexibility

The institution makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank does participate in flexible loan programs. The flexible programs were considered in the overall performance and are described in the Description of Institution section. In response to the COVID-19 pandemic, the bank originated 336 PPP loans totaling \$20.0 million in the Illinois AAs with an additional 21 totaling \$2.1 million in the statewide area of Illinois.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s performance under the Lending Test in the Danville MSA and Bloomington MSA is consistent with the bank’s overall performance under the Lending Test in the full-scope areas.

Refer to Tables O through T in the state of Illinois section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank’s performance under the Investment Test in Illinois is rated Low Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the IL non-MSA is adequate. The bank’s performance in the Champaign-Urbana MSA is adequate. Statewide investments had a positive impact on the state rating.

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

The institution exhibits adequate 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)
Bloomington MSA	0	0	10	853	10	20.8%	853	9.8%	0	0
Champaign-Urbana MSA	0	0	5	561	5	10.4%	561	6.5%	0	0
Danville MSA	0	0	4	31	4	8.3%	31	0.4%	0	0
IL Non-MSA	2	677	24	290	26	54.2%	967	11.1%	0	0
IL - Statewide	3	6,282	0	0	3	6.3%	6,282	72.3%	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.

IL Non-MSA

The bank's performance in the IL non-MSA AA is adequate, both on level of investments and responsiveness to community development needs. There was no use of innovative or complex investments. FFB made 26 investments, totaling \$967,000. This represents 1.6 percent of allocated tier 1 capital. This includes the current outstanding balance of two prior period investments, totaling \$677,000. The majority of FFB's investments focused on organizations providing community services to LMI individuals. The bank made three of their investments to organizations supporting economic development in the area, two investments helped to revitalize or stabilize distressed middle-income CTs, and two investments were for affordable housing.

Champaign-Urbana MSA

The bank's performance in the Champaign-Urbana MSA AA is adequate, both for level of investments and responsiveness to community development needs. There was no use of innovative or complex investments. FFB made five investments, totaling \$561,000, during the evaluation period. This represents 4.8 percent of allocated tier 1 capital. One investment focused on organizations providing community services to LMI individuals. The remaining four investments focused on affordable housing.

Investments – Statewide

In addition to the CD investments that directly benefit the bank's AAs, FFB made three qualifying investments, totaling \$6.3 million, representing 5.6 percent of allocated tier 1 capital. The investments are in SBA 504 loans. When management purchased these investments, they ensured that their investment was equal to the loans located in their AAs included within the loan pools. These investments had a positive impact on the state rating.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Bloomington MSA is stronger than the bank's overall performance. The bank's performance in the Danville MSA is weaker than the bank's overall performance under the Investment Test in the full-scope areas. In the Bloomington MSA, FFB made 10 qualified investments, totaling \$853,000, representing 12.1 percent of allocated tier 1 capital. In the Danville MSA AA, FFB made four qualified investments, totaling \$31,000, representing 0.1 percent of allocated tier 1 capital.

SERVICE TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the IL non-MSA and Champaign-Urbana MSA is good.

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# 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
Bloomington MSA	6.3	3	4.8	0.0	33.3	66.7	0.0	6.4	13.6	53.5	26.5
Champaign-Urbana MSA	10.4	4	4.9	0.0	0.0	50.0	50.0	14.3	16.8	43.6	20.0
Danville MSA	28.5	6	19.4	0.0	33.3	33.3	33.3	4.3	18.6	47.2	29.9
IL Non-MSA	54.8	19	9.7	6.3	37.5	43.8	12.5	0.5	20.3	66.5	11.1

IL Non-MSA

The bank has 19 branches in the AA, with one in a low-income CT and nine in moderate-income CTs. The percentage of branches located in both LMI CTs exceeds the percentage of populations residing in LMI CTs.

The bank complements its branches with ATMs, internet banking, mobile banking, banking by telephone, and banking by mail. The bank 21 ATMs in the AA, with one located in a low-income CT, and 11 located in moderate-income CTs.

Champaign-Urbana MSA

The bank has four branches in the AA with none in LMI CTs.

The bank complements its branches with ATMs, internet banking, mobile banking, banking by telephone, and banking by mail. The bank has four ATMs in the AA, which are located in middle- and upper-income CTs.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Bloomington MSA	0	0	0	0	0	0
Champaign-Urbana MSA	0	0	0	0	0	0
Danville MSA	0	0	0	0	0	0
IL Non-MSA	0	0	0	0	0	0

To the extent changes have been made, the institution'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.

IL Non-MSA

The bank did not open or close branches during the evaluation period.

Champaign-Urbana MSA

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences, its AAs, particularly LMI geographies and/or individuals.

IL Non-MSA

All branches in the bank's network operate similar banking hours. Branches are open for services on Saturdays.

Champaign-Urbana MSA

All branches in the bank's network operate similar banking hours. Branches are open for services on Saturdays.

Community Development Services

The institution provides an adequate level of CD services.

IL Non-MSA

During the evaluation period 11 employees provided services to 12 different organizations. FFB had seven bank employees serve in leadership roles at these organizations. In total, employees donated 1,383 hours of CD services in the IL non-MSA. During the evaluation period, employees served nonprofit organizations involved in providing basic services for LMI people, assisting LMI individuals with affordable housing; and, economic development for small businesses.

Notable examples include:

- An employee serves as a committee member for a revolving loan fund, which provides funding to small businesses.
- An employee serves as a board member of a County Economic Development Council.
- An employee provided volunteer hours at a homeless shelter and presented on a monthly basis, Banking 101, to the residents of the shelter.

Champaign-Urbana MSA

During the evaluation period four employees provided services to five different organizations. FFB had five bank employees serve in leadership roles at these organizations. In total, employees donated 844

hours of CD services in the Champaign-Urbana MSA. During the evaluation period, employees served nonprofit organizations involved in providing basic services for LMI people and assisting LMI individuals with affordable housing.

Notable examples include:

- An employee serves on the Finance Committee of a nonprofit organization that assists families with affordable housing. Services include low construction costs, zero percent financing, and first-time homebuyer education.
- Three bank employees are committee members in a Community Reinvestment Group. The group consists of financial institutions, local government organizations, and non-profit housing providers. The group provides educational services including credit and housing to members of the community including LMI individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Danville MSA is consistent with the bank's overall performance under the Service Test in the full-scope areas. The bank's performance in the Bloomington MSA is weaker than the overall performance under the Service Test in the full-scope area(s).

State Rating

State of Indiana

CRA rating for the State of Indiana: Satisfactory

The Lending Test is rated: Outstanding

The Investment Test is rated: Low Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending activity levels reflect excellent responsiveness to community credit needs.
- The bank exhibits a good geographic distribution of loans in its AA. The bank exhibits excellent distribution of loans among individuals of different income levels and business and farms of different sizes.
- The institution is a leader in making CD loans.
- The institution has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors. The institution exhibits adequate responsiveness to credit and community economic development needs.
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution's AAs.
- The institution provides a relatively high level of CD services.

Description of Institution's Operations in Indiana

As of December 31, 2020, FFB had four AAs within the state of Indiana. These AAs include the Evansville, IN MSA; Indianapolis, IN MSA; Terre Haute, IN MSA; and combined non-MSA. Refer to Appendix A for the geographies that make up the AAs. All state of Indiana AAs met the requirements of CRA regulations and do not arbitrarily exclude any LMI tracts.

FFB offers a full range of loan and deposit products and services through 30 branches and 54 ATMs in the state of Indiana. According to the June 30, 2020, FDIC Market Share Report, FFB held \$1.9 billion in statewide deposits and ranked third in the state, representing 15.9 percent market share. During the evaluation period, 55.5 percent of deposits and 68.7 percent of HMDA and CRA small business loan originations were in the state of Indiana.

Terre Haute MSA

The Terre Haute MSA is comprised of the Indiana counties of Clay, Parke, Sullivan, Vermillion, and Vigo. There is competition for financial services within the Terre Haute MSA. According to the June 30, 2020, FDIC Market Share Report, FFB ranked first out of 10 depository financial institutions in the AA,

with \$1.7 billion in deposits and 51.01 percent market share. FFB has 24 branches and 29 full-service ATMs. The three largest competitors are: Old National Bank, Terre Haute Savings Bank, and Fifth Third Bank which have total deposits of \$1.1 billion, representing 32.3 percent of total deposit market share.

FFB deposits within the Terre Haute MSA accounts for 48.7 percent of total deposits. The primary lending focus was on home mortgage loans. During the evaluation period, FFB originated 5,039 loans totaling \$524.1 million within the Terre Haute MSA. Home mortgage loans in the Terre Haute MSA represented 86.3 percent of the total number of home mortgage originations and 47.0 percent of the total loan volume in the state of Indiana.

The OCC utilized one community contact with an economic development corporation. The contact stated at this point in time, the need for start-up and expansion financing has become even more important. The contact stated the hardest hit businesses, in light of the pandemic, were sole-proprietors without adequate record keeping. These businesses were often unable to pull together PPP applications because of a lack of internal resources. Employers have found it difficult to fill more highly skilled manufacturing jobs with qualified employees. The rural areas in the MSA are less affluent and impaired by a lack of opportunity.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Terre Haute MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	48	8.3	20.8	47.9	22.9	0.0
Population by Geography	189,032	4.4	19.3	47.6	28.7	0.0
Housing Units by Geography	82,448	4.5	18.9	49.5	27.1	0.0
Owner-Occupied Units by Geography	47,636	2.4	13.8	52.3	31.5	0.0
Occupied Rental Units by Geography	23,196	8.5	29.1	41.1	21.3	0.0
Vacant Units by Geography	11,616	5.0	19.6	54.7	20.6	0.0
Businesses by Geography	10,169	5.4	19.1	45.8	29.7	0.0
Farms by Geography	742	1.1	6.7	58.2	34.0	0.0
Family Distribution by Income Level	45,948	21.2	18.2	20.5	40.0	0.0
Household Distribution by Income Level	70,832	24.7	16.6	17.2	41.5	0.0
Median Family Income MSA - 45460 Terre Haute, IN MSA		\$53,117	Median Housing Value			\$90,860
			Median Gross Rent			\$667
			Families Below Poverty Level			12.6%
<i>Source: 2015 ACS and 2020 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>						

IN Non-MSA

The Indiana non-MSA is comprised of the Indiana counties of Daviess, Green and Knox. There is strong competition for financial services within the IN non-MSA. According to the June 30, 2020 FDIC Market Share Report, FFB ranked sixth out of 19 depository financial institutions in the AA, with \$194.2

million in deposits and 7.9 percent market share. FFB has 4 branches and 3 full service ATMS. The five largest competitors are: German American Bank, Old National Bank, Regions Bank, Fifth Third Bank, and Northwest Bank which have total deposits totaling \$1.6 billion, representing 66.6 percent of the total deposit market share.

FFB deposits within the IN non-MSA accounts for 5.6 percent of total deposits. The primary lending focus was on small business loans. During the evaluation period, FFB originated 1,027 loans totaling \$114.3 million within the IN non-MSA. Small business loans in the IN non-MSA represented 16.9 percent of the total number of small business originations and 55.1 percent of the total loan volume in the state of Indiana.

The OCC utilized one community contact with a local small business development organization that supports small businesses in the AA. The organization identified that small business lending has been negatively affected by PPP lending and forgiveness, which has caused bank customers to have excess cash. The organization also identified that the counties in this AA are lacking sufficient broadband access to support economic development and they would be interest in seeing more main street development in each county.

Table A – Demographic Information of the Assessment Area

Assessment Area: IN Non-MSA 2020

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	24	0.0	25.0	50.0	25.0	0.0
Population by Geography	94,666	0.0	17.9	56.9	25.1	0.0
Housing Units by Geography	40,998	0.0	18.9	56.2	24.9	0.0
Owner-Occupied Units by Geography	25,510	0.0	14.5	56.9	28.6	0.0
Occupied Rental Units by Geography	10,446	0.0	27.1	54.9	18.0	0.0
Vacant Units by Geography	5,042	0.0	24.2	55.4	20.4	0.0
Businesses by Geography	6,110	0.0	18.0	58.9	23.2	0.0
Farms by Geography	652	0.0	2.3	66.9	30.8	0.0
Family Distribution by Income Level	23,955	18.5	17.9	22.8	40.8	0.0
Household Distribution by Income Level	35,956	24.4	16.6	18.4	40.6	0.0
Median Family Income Non-MSAs - IN		\$55,715	Median Housing Value			\$95,509
			Median Gross Rent			\$610
			Families Below Poverty Level			10.2%

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.

Scope of Evaluation in Indiana

For the state of Indiana, the OCC completed full-scope reviews of the Terre Haute MSA and IN non-MSA. The OCC performed limited-scope reviews of the Evansville MSA and Indianapolis MSA. The Terre Haute MSA is weighted more heavily in arriving at the overall conclusions for the state, as the bank’s largest market share of loans and deposits is concentrated in this area. Of the bank’s loans in Indiana, 78.2 percent were originated in the Terre Haute MSA AA and 15.9 percent in the IN non-MSA

AA. Of the bank’s deposits in Indiana, 87.7 percent are in the Terre Haute MSA AA and 10.0 percent in the IN non-MSA AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN INDIANA

LENDING TEST

The bank’s performance under the Lending Test in Indiana is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the IN non-MSA and Terre Haute MSA is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Evansville MSA	28	116	0	0	144	2.2	1.0
IN Non-MSA	276	566	185	5	1,032	16.0	10.0
Indianapolis MSA	73	135	26	0	234	3.6	1.3
Terre Haute MSA	2,366	2,005	668	18	5,057	78.2	87.7

*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* Loans	%State Deposits
Evansville MSA	5,419	21,833	0	0	27,252	4.0	1.0
IN Non-MSA	23,066	78,860	12,370	7,823	122,119	16.6	10.0
Indianapolis MSA	7,464	12,605	1,361	0	21,430	3.1	1.3
Terre Haute MSA	240,906	209,967	73,184	46,069	570,126	76.3	87.7

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

Terre Haute MSA

According to 2019 peer mortgage data, FFB had a 17.0 percent market share of home mortgage originations. The market share of home mortgage originations was below their deposit market share. The market share of home mortgage originations ranked first out of 208 lenders in the AA. The market share ranking of home mortgage originations was in the top 0.5 percent of all lenders in the AA. The market

share ranking of home mortgage originations was the same as their deposit market share ranking. The five largest mortgage lenders, including FFB, have captured 52.1 percent of the market.

According to 2019 peer small business data, FFB had a 19.3 percent market share of small business loan originations. The market share of small business loan originations was weaker than the deposit market share. The market share of small business loan originations ranked first out of 64 lenders in the AA. The market share of small business loan originations ranked in the top 1.6 percent of all lenders. The market share ranking of small business loan originations was the same as their deposit market share. The five largest small business lenders, including FFB, have captured 63.2 percent of the market.

According to 2019 peer small business data, FFB had a 51.2 percent market share of small farm loan originations. The market share of small farm loan originations was stronger than the deposit market share. The market share of small farm loan originations ranked first out of 24 lenders in the AA. The market share of small farm loan originations ranked in the top 4.2 percent of all lenders. The market share ranking of small farm loan originations was the same as their deposit market share. The five largest small business lenders, including FFB, have captured 85.9 percent of the market.

IN Non-MSA

According to 2019 peer mortgage data, FFB had a 1.7 percent market share of home mortgage originations. The market share of home mortgage originations was weaker than their deposit market share. The market share of home mortgage originations ranked 13th out of 180 lenders in the AA. The market share ranking of home mortgage originations was in the top 7.2 percent of all lenders in the AA. The market share ranking of home mortgage originations was weaker than the deposit market share ranking. The five largest mortgage lenders, including FFB, have captured 45.5 percent of the market.

According to 2019 peer small business data, FFB had a 6.4 percent market share of small business loan originations. The market share of small business loan originations was weaker than the deposit market share. The market share of small business loan originations ranked seventh out of 60 lenders in the AA. The market share of small business loan originations ranked in the top 11.7 percent of all lenders. The market share ranking of small business loan originations was stronger than their deposit market share. The five largest small business lenders have captured 54.6 percent of the market.

According to 2019 peer small business data, FFB had a 10.9 percent market share of small farm loan originations. The market share of small farm loan originations was stronger than the deposit market share. The market share of small farm loan originations ranked third out of 21 lenders in the AA. The market share of small farm loan originations ranked in the top 14.3 percent of all lenders. The market share ranking of small farm loan originations was stronger than their deposit market share. The five largest small business lenders, including FFB, have captured 80.4 percent of the market.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA(s).

Home Mortgage Loans

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.

Terre Haute MSA

The distribution of home mortgage loans in LMI geographies is good.

During the 2018 analysis period, the distribution of home mortgage loans in LMI geographies is excellent. The proportion of loans equals the percentage of owner-occupied housing units in low-income CTs and exceeded the aggregate industry distribution. The proportion of loans was near to the percentage of owner-occupied housing units in moderate-income CTs and the aggregate industry distribution.

During the 2019-2020 analysis period, the distribution of home mortgage loans in LMI geographies is adequate. The proportion of loans was below the percentage of owner-occupied housing units in low-income CTs and equals the aggregate industry distribution. The proportion of loans was below the percentage of owner-occupied housing units in moderate-income CTs and the aggregate industry distribution.

IN Non-MSA

The distribution of home mortgage loans in LMI geographies is excellent.

During the 2018 analysis period, the distribution of home mortgage loans in LMI geographies is excellent. The proportion of loans in moderate-income CTs exceeded the percentage of owner-occupied housing units and the aggregate industry distribution. There were no low-income CTs during the analysis period.

During the 2019 analysis period, the distribution of home mortgage loans in LMI geographies is excellent. The proportion of loans in moderate-income CTs exceeded the percentage of owner-occupied housing units and the aggregate industry distribution. There were no low-income CTs during the analysis period.

During the 2020 analysis period, the distribution of home mortgage loans in LMI geographies is excellent. The proportion of loans in moderate-income CTs exceeded the percentage of owner-occupied housing units and the aggregate industry distribution. There were no low-income CTs during the analysis period.

Small Loans to Businesses

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.

Terre Haute MSA

The distribution of small loans to businesses in LMI geographies is excellent.

During the 2018 analysis period, the distribution of small loans to businesses in LMI geographies is good. The proportion of small loans to businesses exceeded the percentage of businesses in businesses in low-income CTs and exceeded the aggregate industry distribution. The proportion of small loans to businesses was below the percentage of businesses in moderate-income CTs and the aggregate industry distribution.

During the 2019-2020 analysis period, the distribution of small loans to businesses in LMI geographies is excellent. The proportion of small loans to businesses exceeded the percentage of businesses in low-income CTs and the aggregate industry distribution. The proportion of small loans to businesses was below the percentage of businesses in moderate-income CTs and near to the aggregate industry distribution.

IN Non-MSA

The distribution of small loans to businesses in LMI geographies is good.

During the 2018 analysis period, the distribution of small loans to businesses in LMI geographies is good. The proportion of small loans to businesses was below the percentage of businesses in moderate-income CTs and exceeded the aggregate industry distribution. There were no low-income CTs during the analysis period.

During the 2019 analysis period, the distribution of small loans to businesses in LMI geographies is good. The proportion of small loans to businesses was below the percentage of businesses in moderate-income CTs and exceeded the aggregate industry distribution. There were no low-income CTs during the analysis period.

During the 2020 analysis period, the distribution of small loans to businesses in LMI geographies is excellent. The proportion of small loans to businesses exceeded the percentage of businesses in moderate-income CTs and exceeded the aggregate industry distribution. There were no low-income CTs during the analysis period.

Small Loans to Farms

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.

Terre Haute MSA

The distribution of small loans to farms in LMI geographies is adequate.

During the 2018 analysis period, the distribution of small loans to farms in LMI geographies is adequate. The proportion of small loans to farms was significantly below the percentage of farms in low-income CTs. There was no aggregate lending in low-income CTs. The proportion of small loans to farms was significantly below the percentage of farms in moderate-income CTs and the aggregate industry distribution. Both the LMI geographies have significantly limited opportunities for lending, with low-income CTs having six farms moderate income CTs having 30 farms, per demographic data. Given the limitations, the performance is elevated to adequate.

During the 2019-2020 analysis period, the distribution of small loans to farms in LMI geographies is adequate. The proportion of small loans to farms was significantly below the percentage of farms in low-income CTs. There was no aggregate lending low-income CTs. The proportion small loans to farms was below the percentage of farms in moderate-income CTs and exceeded the aggregate industry distribution. Both the LMI geographies have significantly limited opportunities for lending, with low-

income CTs having eight farms and moderate-income CTs having 50 farms, per demographic data. More weight was given to the performance in moderate-income geographies.

IN Non-MSA

The distribution of small loans to farms in LMI geographies is good. There were no low-income CTs during the analysis period.

During the 2018 analysis period, the distribution of small loans to farms in LMI geographies is excellent. The proportion of small loans to farms exceeded the percentage of farms in moderate-income CTs and the aggregate industry distribution.

During the 2019 analysis period, the distribution of small loans to farms in LMI geographies is excellent. The proportion of small loans to farms exceeded the percentage of farms in moderate-income CTs and the aggregate industry distribution.

During the 2020 analysis period, the distribution of small loans to farms in LMI geographies is poor. The proportion of small loans to farms is below the percentage of farms in moderate-income CTs and the aggregate industry distribution.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. The OCC reviewed summary reports, maps, and analyzed the bank's home mortgage and small business 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 an excellent 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

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.

Terre Haute MSA

The borrower distribution of home mortgage loans to LMI borrowers is excellent.

During the 2018 analysis period, the borrower distribution of home mortgage loans to LMI borrowers is excellent. The proportion of loans to low-income borrowers was below the percentage of low-income families but exceeded the aggregate industry distribution. The proportion of loans to moderate-income borrowers exceeded the percentage of moderate-income families and the aggregate industry distribution.

During the 2019-2020 analysis period, the borrower distribution of home mortgage loans to LMI borrowers is excellent. The proportion of loans to low-income borrowers was significantly below the percentage of low-income families but exceeded the aggregate industry distribution. The proportion of

loans to moderate-income borrowers exceeded the percentage of low-income families and the aggregate industry distribution.

IN Non-MSA

The borrower distribution of home mortgage loans to LMI borrowers is excellent.

During the 2018 analysis period, the borrower distribution of home mortgage loans to LMI borrowers is excellent. The proportion of loans to low-income borrowers was near to the percentage of low-income families and exceeded the aggregate industry distribution. The proportion of moderate-income borrowers exceeded the percentage of moderate-income families and the aggregate distribution.

During the 2019 analysis period, the borrower distribution of home mortgage loans to LMI borrowers is good. The proportion of loans to low-income borrowers was significantly below the percentage of low-income families and below the aggregate industry distribution. The portion of moderate-income borrowers exceeded the percentage of moderate-income families and was near to the aggregate industry distribution.

During the 2020 analysis period, the borrower distribution of home mortgage loans to LMI borrowers is adequate. The proportion of loans to low-income borrowers was below the percentage of low-income families but exceeded the aggregate industry distribution. The proportion of loans to moderate-income borrowers was below the percentage of moderate-income families and well below the aggregate industry distribution.

Small Loans to Businesses

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 origination and purchase of small loans to businesses.

Terre Haute MSA

The borrower distribution of small loans to businesses by revenue is good.

During the 2018 analysis period, the borrower distribution of small loans to businesses by revenue is good. The proportion of small loans to small businesses was below the percentage of small businesses and exceeded the aggregate industry distribution.

During the 2019-2020 analysis period, the borrower distribution of small loans to businesses by revenue is good. The proportion of small loans to small businesses was below the percentage of small businesses and exceeded the aggregate industry distribution.

IN Non-MSA

The borrower distribution of small loans to businesses by revenue is good.

During the 2018 analysis period, the borrower distribution of small loans to businesses by revenue is good. The proportion of small loans to small businesses was below the percentage of small businesses and exceeded the aggregate industry distribution.

During the 2019 analysis period, the borrower distribution of small loans to businesses by revenue is good. The proportion of small loans to small businesses was below the percentage of small businesses and exceeded the aggregate industry distribution.

During the 2020 analysis period, the borrower distribution of small loans to businesses by revenue is adequate. The proportion of small loans to small businesses was well below the percentage of small businesses and exceeded the aggregate industry distribution.

Small Loans to 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 businesses.

Terre Haute MSA

The borrower distribution of small loans to farms by revenue is excellent.

During the 2018 analysis period, the borrower distribution of small loans to farms by revenue is excellent. The proportion of small loans to small farms was near to the percentage of small farms and exceeded the aggregate industry distribution.

During the 2019-2020 analysis period, the borrower distribution of small loans to farms by revenue is excellent. The proportion of small loans to small farms was below the percentage of small farms and exceeded the aggregate industry distribution.

IN Non-MSA

The borrower distribution of small loans to farms by revenue is good.

During the 2018 analysis period, the borrower distribution of small loans to farms by revenue is excellent. The proportion of small loans to small farms was below the percentage of small farms and significantly exceeded the aggregate industry distribution.

During the 2019 analysis period, the borrower distribution of small loans to farms by revenue is good. The proportion of small loans to small farms was well below to the percentage of small farms and exceeded the aggregate industry distribution.

During the 2020 analysis period, the borrower distribution of small loans to farms by revenue is adequate. The proportion of small loans to small farms was well below to the percentage of small farms and slightly below the aggregate industry distribution.

Community Development Lending

The institution is a leader in making CD loans.

The Lending Activity Tables, shown above, 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.

Terre Haute MSA

The bank is a leader in providing CD loans within the AA. The bank originated 18 CD loans totaling \$46.1 million, representing 20.0 percent of allocated tier 1 capital. Two CD loans totaling \$10.1 million benefited affordable housing and five CD loans totaling \$3.2 million. Seven PPP loans totaling \$32.8 million were also originated.

Notable CD loans include:

- A \$9.6 million loan benefiting affordable housing to an organization that provides housing with 68 units to LMI seniors.
- A \$2.9 million loan benefiting community service to an organization that provides medical care to LMI persons.
- A \$489,000 loan benefiting affordable housing to an organization that provides 60 housing units to low-income persons.

IN Non-MSA

The bank is a leader in providing CD loans within the AA. The bank originated five CD loans totaling \$7.8 million, representing 29.7 percent of allocated tier 1 capital. Two CD loans totaling \$2.0 million benefited community service and one CD loan totaling \$2.6 million benefited economic development. Two PPP loans totaling \$3.3 million were also originated.

Notable CD loans include:

- A \$2.6 million loan to support economic development through financing the expansion of a business that provided 10 new jobs to LMI persons.
- A \$1.1 million loan benefiting community service through the renovation and expansion of a training facility for an organization that provides job training and employment assistance to LMI persons with special needs.
- An \$850,000 loan supporting community service through an organization that provides LMI persons with disabilities various services, including employment and housing services.

Product Innovation and Flexibility

The institution makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank does participate in flexible loan programs. The flexible programs were considered in the overall performance and are described in the Description of Institution section. In response to the COVID-19 pandemic, the bank originated 980 PPP loans totaling 73.2 million in the Indiana AAs with an additional 94 totaling \$7.7 million in the statewide area of Indiana.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Evansville MSA and Indianapolis MSA is weaker than the bank's overall performance under the Lending Test in the full-scope areas. This performance had a neutral impact to the overall CD lending performance due to the limited presence in the limited-scope areas compared to the full-scope areas.

The bank had no qualifying CD lending activities in the analysis period for either the Evansville MSA or the Indianapolis MSA. Consideration was given to the fact that there are limited opportunities for community development activities within these AAs.

Refer to Tables O through T in the state of Indiana section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank’s performance under the Investment Test in Indiana is rated Low Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Terre Haute MSA is adequate. The bank’s performance in the IN non-MSA is poor.

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

The institution exhibits adequate 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)
Terre Haute MSA	2	1,878	54	271	56	69.1	2,149	35.4	0	0
Indianapolis MSA	1	350	1	2	2	2.5	352	5.8	0	0
Evansville MSA	0	0	4	221	4	4.9	221	3.6	0	0
IN Non-MSA	0	0	17	30	17	21.0	30	0.5	0	0
IN - Statewide	1	2,570	1	750	2	2.5	3,320	54.7	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.

Terre Haute MSA

The bank’s performance in the Terre Haute MSA AA is adequate, due to the adequate responsiveness to meeting community development needs and occasional use of innovative investments. One innovative investment is the Free Fare Friday that allows residents to travel on bus routes free of charge. There are several branch locations along the bus transit routes for customers to perform transactions and conduct financial business. Of the bus stops, 54 percent are in LMI areas and within walking distance of five branches and 15 ATMs. FFB made 56 investments, totaling \$2.1 million, during the evaluation period. This represents 0.9 percent of allocated tier 1 capital. This includes the current outstanding balance of two prior period investment, totaling \$1.9 million. Community contacts noted a need for more funding for non-profit organizations in the AA. A majority of the investments were focused on organizations providing services to LMI individuals, most of which were non-profits.

IN Non-MSA

The bank’s performance in the IN non-MSA AA is poor. Both the level and responsiveness to community development needs are poor. FFB made 17 investments, totaling \$30 thousand, during the evaluation period. This represents 0.1 percent of allocated tier 1 capital. The investments focused on organizations providing community services to LMI individuals, economic development, and revitalization or stabilization.

Investments – Statewide

In addition to the CD investments that directly benefit the bank’s AAs, the bank had one statewide investment totaling \$2.6 million, representing 1.3 percent of allocated tier 1 capital for the state. FFB had a qualifying investment with Indiana Housing Community Development Authority, totaling \$750,000.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s performance under the Investment Test in the Evansville MSA and Indianapolis MSA is stronger than the bank’s overall performance under the Investment Test in the full-scope areas. In the Evansville MSA AA, FFB made four qualified investments, totaling \$221,000, or 8.0 percent of allocated tier 1 capital. In the Indianapolis MSA AA, FFB made two qualified investments, totaling \$352,000, or 10.6 percent of allocated tier 1 capital.

SERVICE TEST

The bank’s performance under the Service Test in Indiana is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Terre Haute MSA and IN non-MSA is good.

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# 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
Evansville MSA	1.0	1	3.3	0.0	0.0	0.0	100.0	14.0	25.7	33.2	26.9
Indianapolis MSA	1.3	1	3.3	0	0.0	100.0	0	0	16.3	83.7	0
Terre Haute MSA	87.7	24	80.0	0.0	12.5	70.8	16.7	4.9	19.2	44.4	31.5

IN Non-MSA	10.0	4	13.3	0.0	0.0	75.0	25.0	0.0	14.0	63.9	22.1
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Terre Haute MSA

FFB has 24 branches in the AA, with one in a low-income CT and three in moderate-income CTs. The percentage of branches located in low-income CTs is below the population residing in low-income CTs and the percent of branches in moderate-income CTs exceeds the percentage of population residing in moderate-income CTs. One branch is near to low-income CT and four branches are near to moderate-income CTs.

The bank complements its branches with ATMs, internet banking, mobile banking, banking by telephone, and banking by mail. The bank has 45 ATMs in the AA, with eight located in moderate-income CTs. The bank sponsors Free Fare Friday that allows resident to travel on bus routes free of charge. There are several branch locations on the bus route for customers to conduct business. Of the bus stops, 54 percent are LMI areas within walking distance of five branches and 15 ATMs.

IN Non-MSA

FFB has four branches in the AA, with two in moderate-income CTs. The percentage of branches located in moderate-income CTs exceeds the percentage of population residing in moderate-income CTs. The bank complements its branches with ATMs, internet banking, mobile banking, banking by telephone, and banking by mail.

The bank complements its branches with ATMs, internet banking, mobile banking, banking by telephone, and banking by mail. The bank has seven ATMs in the AA, with two located in moderate-income CTs.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Branch Openings/Closings			
			Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Evansville MSA	0	0	0	0	0	0
Indianapolis MSA	0	0	0	0	0	0
Terre Haute MSA	0	-2	0	0	-1	-1
IN Non-MSA	0	-1	0	0	-1	0

To the extent changes have been made, the institution'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.

Terre Haute MSA

Two branches were closed, one in both a middle- and an upper-income CT.

IN Non-MSA

One branch in a middle-income CT was closed.

Services, including where appropriate, business hours, do not vary in a way that inconveniences, its AAs, particularly LMI geographies and/or individuals.

Terre Haute MSA

All branches in the bank's network operate similar banking hours. Branches are open for services on Saturdays for 22 of 24 branches.

IN Non-MSA

All branches in the bank's network operate similar banking hours. Branches are open for services on Saturdays.

Community Development Services

The institution provides a relatively high level of CD services.

Terre Haute MSA

During the evaluation period 37 employees provided services to 38 different organizations. FFB had 33 bank employees serve in leadership roles at these organizations. In total, employees donated 7,571 hours of CD services in the Terre Haute MSA. During the evaluation period, employees served nonprofit organizations involved in providing basic services for LMI people, assisting LMI individuals with affordable housing, economic development.

Notable examples include:

- An employee serves as a board member of an economic development council responsible for the downtown revitalization development.
- An employee serves as board member and on the Finance Committee of a homeless shelter.
- An employee served as Vice President and board member of a Small Business Advisory Board. The organization provides services to small business owners and start-up businesses.
- Three employees serve as board members for the Economic Development Corporation.

IN Non-MSA

During the evaluation period, five employees provided services to five different organizations. FFB had four bank employees serve in leadership roles at these organizations. In total, employees donated 1,008 hours of CD services in the IN non-MSA. During the evaluation period, employees served nonprofit organizations involved in providing basic services for LMI people, assisting LMI individuals with affordable housing and economic development.

Notable examples include:

- An employee serves on the Finance Committee of a nonprofit organization that assists families with affordable housing. Services include low construction costs, zero percent financing, and first-time homebuyer education.
- Three bank employees are committee members in a Community Reinvestment Group. The group consists of financial institutions, local government organizations, and non-profit housing providers. The group provides educational services including credit and housing to members of the community including LMI individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Evansville MSA and Indianapolis MSA is consistent with the bank's overall performance under the Service Test in the full-scope area(s).

State Rating

State of Kentucky

CRA rating for the State of Kentucky: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending activity levels reflect excellent responsiveness to community credit needs.
- The bank exhibits an excellent geographic distribution of loans in its AA. The bank exhibits good distribution of loans among individuals of different income levels and business and farms of different sizes.
- The institution has made a low level of CD loans.
- The institution has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors. The institution exhibits adequate responsiveness to credit and community economic development needs.
- Service delivery systems are accessible to geographies and individuals of different income levels in the institution's AAs.
- The institution provides an adequate level of CD services.

Description of Institution's Operations in Kentucky

The Kentucky non-MSA is comprised of the counties of Fulton, Calloway, Marshall, and Todd. During the evaluation period, Calloway, Fulton and Todd counties were included on the FFIEC List of Distressed or Underserved Nonmetropolitan Middle-Income Geographies. These counties were designated as distressed due to poverty, unemployment, or population loss and underserved due to remote rural location. The Kentucky AA was added in October 2019 due to the acquisition of Heritage Bank. The OCC took into consideration the COVID-19 pandemic and FFB's limited presence in this AA, which restricted the bank's efforts in community development activities. The AA meets the requirement of the regulation and does not arbitrarily exclude LMI geographies.

According to the 2015 U.S. Census data, the AA consists of 21 CTs, of which zero are low-income and three are moderate-income. Based on the June 30, 2020, FDIC Deposit Market Share data, FFB had \$331.3 million in deposits and ranked second in the state, with a market share of 13.9 percent.

FFB provides a full range of loan and deposit products and services in the state. The bank operates seven full-service branches: two are located in moderate-income CTs, three are located in middle-income CTs, and one is located in an upper-income CT. In addition, the bank has 9 ATMs throughout the AA. The branches represent 9.5 percent of the bank's total branch network.

The bank made 2.2 percent of its loan originations and purchases compared to total bank loans during the evaluation period in the AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: KY Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	21	0.0	14.3	57.1	28.6	0.0
Population by Geography	88,233	0.0	13.6	54.4	32.0	0.0
Housing Units by Geography	42,787	0.0	15.1	55.7	29.1	0.0
Owner-Occupied Units by Geography	23,998	0.0	7.3	58.1	34.6	0.0
Occupied Rental Units by Geography	10,573	0.0	33.6	42.6	23.8	0.0
Vacant Units by Geography	8,216	0.0	14.1	65.9	20.0	0.0
Businesses by Geography	5,590	0.0	16.2	50.7	33.1	0.0
Farms by Geography	560	0.0	8.8	65.9	25.4	0.0
Family Distribution by Income Level	22,365	16.6	16.2	18.6	48.5	0.0
Household Distribution by Income Level	34,571	24.0	13.1	16.1	46.8	0.0
Median Family Income Non-MSAs - KY		\$45,986	Median Housing Value			\$109,486
			Median Gross Rent			\$588
			Families Below Poverty Level			11.7%
<i>Source: 2015 ACS and 2020 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>						

Employment Factors

According to the U.S. Bureau of Labor and Statistics, as of March 2021, the unemployment rate in Calloway County was 5.1 percent, up from 4.3 percent in January of 2018. The unemployment rate in Fulton County was 5.5 percent, down from 6 percent in January of 2018. The unemployment rate in Marshall County was 4.9 percent, down from 6.7 percent in January of 2018. The unemployment rate in Todd County was 3.8 percent, down from 4.6 percent in January of 2018. The statewide unemployment rate for Kentucky was 5 percent, up from 4.7 percent in January of 2018. The national unemployment rate as of March 2021 was 6.0 percent.

Housing Characteristics

According to the 2015 U.S Census, there were 42,787 total housing units in the AA. Owner-occupied units represented 56.1 percent of the total housing units in the AA, and 24.7 percent were rental occupied units. There were 0 percent of all owner-occupied units and renter-occupied units located in low-income CTs. There were 7.3 percent of all owner-occupied units and 33.6 percent of renter-occupied units located in moderate-income CTs.

There were 32,807 single family (1-4 unit) homes and 3,431 multifamily (five-plus unit) housing units in the AA. The distribution of housing units in low-income CTs was 0 percent for single family and multifamily. The distribution of housing units in moderate-income CTs was 12.5 percent single family and 58.5 percent of multifamily.

The OCC utilized one community contact with an economic development organization. The development of affordable housing is a need given significant increases in the cost of materials. Prior to the significant cost increase in materials and construction, local agencies were able to build adequate, affordable housing. There is a need for SBA 504 lending and micro loan lending. This organization has been active 504 lenders and lending subordinated debt through SBA micro loan program and revolving loan funds.

Scope of Evaluation in Kentucky

The KY non-MSA is analyzed as a full-scope AA. Within the AA home mortgage loans accounted for 34.6 percent of loan volume. Within the AA, small loans to businesses accounted for 46.5 percent of loan volume.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KENTUCKY

LENDING TEST

The bank’s performance under the Lending Test in Kentucky is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the KY non-MSA is good.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
KY Non-MSA	79	105	42	0	226	100.0	100.0

*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* Loans	%State Deposits
KY Non-MSA	13,059	10,694	4,291	0	28,044	100.0	100.0

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

According to 2019 peer mortgage data, FFB had a 1.4 percent market share of home mortgage originations. The market share of home mortgage originations was weaker than their deposit market share. The market share of home mortgage originations ranked 19th out of 180 lenders in the AA. The market share ranking of home mortgage originations was in the top 10.6 percent of all lenders in the AA. The market share ranking of home mortgage originations was weaker than the deposit market share ranking. The five largest mortgage lenders have captured 32.4 percent of the market.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AA(s).

Home Mortgage Loans

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

The distribution of home mortgage loans in LMI geographies is excellent. The proportion of loans in exceeded the percentage of owner-occupied housing units in moderate-income CTs and the aggregate industry distribution. There were no low-income CTs in the analysis period.

Small Loans to Businesses

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

The distribution of small loans to businesses in LMI geographies is excellent. The proportion of small loans to businesses exceeded the percentage of businesses in moderate-income CTs and the aggregate industry distribution.

Small Loans to Farms

Refer to Table S in the state of Kentucky 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 distribution of small loans to farms in LMI geographies excellent. The proportion of small loans to farms exceeded the percentage of farms in moderate-income CTs and the aggregate industry distribution.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. The OCC reviewed summary reports, maps, and analyzed the bank's home mortgage and small business 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

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

The distribution of home mortgage loans to LMI borrowers is good. The proportion of loans was below the percentage of low-income families and exceeded the aggregate industry distribution. The proportion of loans was near to the percentage of moderate-income families and the aggregate industry distribution.

Small Loans to Businesses

Refer to Table R in the state of Kentucky 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 distribution of small loans to businesses by revenue is adequate. The proportion of small loans to small businesses was well below the percentage of small businesses and below the aggregate industry distribution.

Small Loans to Farms

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

The borrower distribution of small loans to farms by revenue is excellent. The proportion of loans to small farms is below the percentage of small farms and exceeded the aggregate industry distribution.

Community Development Lending

The institution has made a low level of CD loans.

The Lending Activity Tables, shown above, 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.

The bank did not have any qualifying CD loans. While this had a negative impact on the CD lending performance, consideration is given to the rural nature of the AA and the bank's limited presence in the AA.

Product Innovation and Flexibility

The institution makes no use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank does participate in flexible loan programs. The flexible programs were considered in the overall performance and are described in the Description of Institution section. In response to the COVID-19 pandemic, the bank originated 78 PPP loans totaling \$5.1 million in the Kentucky AAs with an additional 20 totaling \$2.6 million in the statewide area of Kentucky.

INVESTMENT TEST

The bank's performance under the Investment Test in Kentucky is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the KY non-MSA is adequate.

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

The institution exhibits adequate 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)
KY Non-MSA	4	3,088	8	1,837	12	75.00%	4,925	38.36%	0	0
KY – State-wide	1	2,330	3	2,921	4	25.00%	5,251	61.63%	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.

FFB made 12 investments, totaling \$4.9 million. This represents 11 percent of allocated tier 1 capital. This includes the current outstanding balance of four prior period investments, totaling \$3.1 million. The bank made three investments focused on organizations providing community services to LMI individuals, one of their investments supported economic development in the area, and two investments were for affordable housing.

Investments – Statewide

In addition to the CD investments that directly benefit the bank’s AAs, FFB had four qualifying investments totaling \$5.3 million in the state.

SERVICE TEST

The bank’s performance under the Service Test in Kentucky is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the non-MSA is adequate.

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# 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
KY Non-MSA	100.0	7	100.0	0	28.6	42.9	28.6	0	13.6	54.4	32.0

FFB has seven branches in the AA, with two in moderate-income CTs. The percentage of branches located in moderate-income CTs exceeds the percentage of population residing in moderate-income CTs.

The bank complements its branches with ATMs, internet banking, mobile banking, banking by telephone, and banking by mail. The bank has ten ATMs, with three located in moderate-income CTs.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Branch Openings/Closings			
			Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
KY Non-MSA	0	0	0	0	0	0

To the extent changes have been made, the institution’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.

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences, AAs, particularly LMI geographies and/or individuals.

Branches are open for services on Saturdays.

Community Development Services

The institution provides an adequate level of CD services.

During the evaluation period, eight employees provided services to 12 different organizations. FFB had nine bank employees serve in leadership roles at these organizations. In total, employees donated 804 hours of CD services in the KY non-MSA. During the evaluation period, employees served nonprofit organizations involved in providing basic services for LMI people, assisting LMI individuals with affordable housing and economic development.

Notable examples include:

- An employee serves as Board Chairman and another services as Vice Chair for an economic development organization that recruits new employers and assists local employers to grow and generate quality job opportunities.
- An employee serves as Board Chairman of a county housing authority that operates 212 subsidized housing units for low-income families, the elderly and disabled.

- An employee serves as board member of a combined county economic development partnership. The organization provides a business-friendly climate and promotes local growth and opportunities.

State Rating

State of Tennessee

CRA rating for the State of Tennessee: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending activity levels reflect adequate responsiveness to community credit needs.
- The bank exhibits a good geographic distribution of loans in its AA. The bank exhibits good distribution of loans among individuals of different income levels and businesses of different sizes.
- The institution has made a low level of CD loans.
- The institution has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors. The institution exhibits adequate responsiveness to credit and community economic development needs.
- Service delivery systems are accessible to geographies and individuals of different income levels in the institution's AAs.
- The institution provides an adequate level of CD services.

Description of Institution's Operations in Tennessee

As of December 31, 2020, FFB has two AAs within the state of Tennessee. These AAs include the Nashville-Davidson-Murfreesboro-Franklin, TN (Nashville) MSA and combined non-MSA. The Tennessee AAs were added in October 2019 due to the acquisition of Heritage Bank. The OCC took into consideration the COVID-19 pandemic and FFB's limited presence in this AA, which restricted the bank's efforts in lending and community development activities. Refer to Appendix A for the geographies that make up the AAs. All state of Tennessee AAs met the requirements of CRA regulations and do not arbitrarily exclude LMI tracts.

According to the 2015 U.S. Census data, the AA consists of 9 CTs, of which zero are low-income and four are moderate-income. Based on the June 30, 2020, FDIC Deposit Market Share Data, FFB held \$136 million in statewide deposits, ranking third in the state, representing 18.6 percent market share. Primary competitors within the AA are the following: Reliant Bank, which ranked first in deposit market share (34.3 percent) with 4 branches and Pinnacle Bank, which ranked second in deposit market share (26.7 percent) with 1 branch.

FFB provides a full range of loan and deposit products and services in the state. The bank operates four full-service branches: one is located in the moderate-income CTs and three are located in middle-income

CTs. In addition, the bank has 5 ATMs throughout the AA. The branches represent 4.1 percent of the bank’s total branch network.

The bank made 1.0 percent of its loan originations and purchases compared to total bank loans during the evaluation period in the AA.

Nashville MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Nashville MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	9	0.0	44.4	55.6	0.0	0.0
Population by Geography	39,422	0.0	41.2	58.8	0.0	0.0
Housing Units by Geography	15,797	0.0	42.6	57.4	0.0	0.0
Owner-Occupied Units by Geography	11,513	0.0	41.3	58.7	0.0	0.0
Occupied Rental Units by Geography	2,986	0.0	43.3	56.7	0.0	0.0
Vacant Units by Geography	1,298	0.0	53.2	46.8	0.0	0.0
Businesses by Geography	2,456	0.0	39.7	60.3	0.0	0.0
Farms by Geography	117	0.0	40.2	59.8	0.0	0.0
Family Distribution by Income Level	10,561	23.3	19.3	21.9	35.6	0.0
Household Distribution by Income Level	14,499	22.4	18.2	19.8	39.7	0.0
Median Family Income MSA - 34980 Nashville-Davidson--Murfreesboro-- Franklin, TN MSA		\$66,441	Median Housing Value			\$158,206
			Median Gross Rent			\$942
			Families Below Poverty Level			10.6%
<i>Source: 2015 ACS and 2020 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>						

Employment Factors

According to the U.S. Bureau of Labor and Statistics, as of March 2021, the unemployment rate in Cheatham County, TN was 4.1 percent, up from 2.8 percent in January of 2018. The national unemployment as of March 2021 was 6.0 percent; the unemployment rate for the state of Tennessee was 5.1 percent.

Housing Characteristics

According to the 2015 U.S. Census, there were 15,797 total housing units in the AA. Owner-occupied units represented 72.9 percent of the total housing units in the AA, and 18.9 percent were rental occupied units. There were 0 percent of all owner-occupied units and renter-occupied units located in the low-income CTs. There were 41.3 percent of all owner-occupied units and 43.3 percent of renter-occupied units located in moderate-income CTs.

There were 12,998 single family (1-4 unit) homes and 900 multifamily (five plus unit) housing units in the AA. The distribution of housing units in low-income CTs was 0 percent single family and 0 percent multifamily. The distribution of housing units in moderate-income CTs was 42.1 percent single family and 57.9 percent of multifamily.

The OCC utilized a community contact for an organization that finances affordable housing and revitalization projects throughout Middle Tennessee. The organization is a certified Community Development Financial Institution (CDFI). The contact stated community needs include loans to rehabilitate or construct affordable housing, community facilities, and redevelopment of industrial sites. There are service opportunities that include providing technical assistance on financial services and providing credit counseling and home buyer education.

Scope of Evaluation in Tennessee

For the state of Tennessee, the OCC completed a full-scope review of the Nashville MSA. The OCC performed a limited-scope review of the TN non-MSA AA. Of the bank’s loans in Tennessee, 87.6 percent were originated in the Nashville MSA and 12.4 were originated in the TN non-MSA. Of the bank’s deposits, in Tennessee, 3.5 percent are in the Nashville MSA and 0.4 percent in the TN non-MSA.

An analysis was not performed on small farm lending data as there was too few originations for a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TENNESSEE

LENDING TEST

The bank’s performance under the Lending Test in Tennessee is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Nashville MSA is good.

Lending Activity

Lending levels reflects adequate responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Nashville MSA	44	34	0	0	78	87.6	90.0
TN Non-MSA	7	4	0	0	11	12.4	10.0

*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* Loans	%State Deposits
Nashville MSA	7,739	1,270	0	0	9,009	91.2	90.0
TN Non-MSA	493	371	0	0	864	8.8	10.0

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

According to June 30, 2020, FDIC Market Share Reports, FFB had \$122.0 million in deposits in the Nashville MSA and had a 20.8 percent market share of deposits. The deposit market share ranked third out of four deposit taking institutions in the AA. The deposit market share ranking was in the top 75.0 percent of all deposit taking institutions.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA(s).

Home Mortgage Loans

Refer to Table O in the state of Tennessee 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.

Nashville MSA

The distribution of home mortgage loans in LMI geographies is good. The proportion of loans was below the percentage of owner-occupied housing units in moderate-income CTs and the aggregate industry distribution. There were no low-income CTs in the analysis period.

Small Loans to Businesses

Refer to Table Q in the state of Tennessee 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.

Nashville MSA

The distribution of small loans to businesses by LMI geographies is adequate. The proportion of small loans to businesses was below the percentage of businesses in moderate-income CTs and the aggregate industry distribution. There were no low-income CTs in the analysis period.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. The OCC reviewed summary reports, maps, and analyzed the bank’s home mortgage and small business 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 good distribution of loans among individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table P in the state of Tennessee 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.

Nashville MSA

The distribution of home mortgage loans to LMI borrowers is excellent. The proportion of loans was below the percentage of low-income families and exceeded the aggregate industry distribution. The proportion of loans exceeded the percentage of moderate-income families and the aggregate industry distribution.

Small Loans to Businesses

Refer to Table R in the state of Tennessee 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.

Nashville MSA

The distribution of small loans to businesses by revenue is adequate. The proportion of small loans to businesses was significantly below the percentage of small businesses and the aggregate industry distribution. The bank originated 34 loans in the analysis period, however, 85.3 percent had no revenue information, per Table R. The loans with no revenue information represent commercial multifamily property loans, as such, revenue is not required to be reported. This context was considered in the analysis.

Community Development Lending

The institution has made a low level of CD loans.

The Lending Activity Tables, shown above, 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.

The bank did not have any qualifying CD loans. This had a negative impact on the CD lending performance.

In the statewide area, one PPP loan totaling \$1.2 million was originated.

Product Innovation and Flexibility

The institution makes no use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank does participate in flexible loan programs. The flexible programs were considered in the overall performance and are described in the Description of Institution section. In response to the

COVID-19 pandemic, the bank originated 35 PPP loans totaling \$1.2 million in the Tennessee AAs with an additional 31 totaling \$2.6 million in the statewide area of Tennessee.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank’s performance under the Lending Test in the TN non-MSA is weaker than the bank’s overall performance under the Lending Test in the full-scope area.

The bank had no qualifying CD lending activities in the analysis period for the TN non-MSA. The bank did not originate or purchase a meaningful volume of loans for either home mortgage, small loans to businesses, or small loans to farms for an analysis.

Refer to Tables O through T in the state of Tennessee section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank’s performance under the Investment Test in Tennessee is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Nashville MSA is adequate.

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

The institution exhibits adequate responsiveness to credit and community economic development needs. The institution rarely 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)
Nashville MSA	0	0	2	198	2	100.00%	198	100.00%	0	0
TN non-MSA	0	0	0	0	0	0	0	0	0	0

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

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

Nashville TN MSA AA

The bank’s performance in the Nashville TN MSA AA is adequate, both on level of investments and responsiveness to community development needs. There was no use of innovative or complex investments. FFB made two investments totaling \$198,000. This represents 1.20 percent of allocated tier 1 capital.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank’s performance under the Investment Test in the TN non-MSA is weaker than the bank’s overall performance under the Investment Test in the full-scope area. The bank did not provide investments in the TN non-MSA.

SERVICE TEST

The bank’s performance under the Service Test in Tennessee is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Nashville MSA is adequate.

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# 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
Nashville MSA	90.0	3	75.0	0	33.3	66.7	0	0	41.2	58.8	0
TN Non-MSA	10.0	1	25.0	0	0	100.0	0	0	0	100.0	0

FFB has 3 branches in the AA, with one in a moderate-income CT. The percentage of branches located in moderate-income CTs is near to the percentage of population residing in moderate-income CTs.

The bank complements its branches with ATMs, internet banking, mobile banking, banking by telephone, and banking by mail. The bank has five ATMs, with two in moderate-income CTs.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Nashville MSA	0	0	0	0	0	0
TN non-MSA	0	0	0	0	0	0

To the extent changes have been made, the institution'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.

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or individuals.

All branches in the AA operate similar banking hours. Branches are open for services on Saturdays.

Community Development Services

The institution provides an adequate level of CD services.

During the evaluation period three employees provided services to four different organizations. All the bank employees served in leadership roles at these organizations. In total, employees donated 1,028 hours of CD services in the Nashville MSA. During the evaluation period, employees served nonprofit organizations involved in providing basic services for LMI people and economic development.

Notable examples include:

- An employee is a board member and finance chair for an organization that provides weekly groceries and meals to the elderly, with a majority of the recipients being LMI individuals.
- An employee served as past President and board member of an Area Development Corporation. The organization administers small business financing using the SBA 504 loan program.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the TN non-MSA is inconsistent with the bank's overall performance under the Service Test in the full-scope area. The AA exhibits accessible delivery systems. The performance in community development services was weaker, with no services being provided.

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:	1/1/2018 to 12/31/2020	
Bank Products Reviewed:	Home mortgage loans, small business loans, CD loans, CD investments, and CD services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		
Clarksville, TN-KY MSA	Full-Scope	Christian (KY, Trigg (KY) and Montgomery (TN) Counties
Illinois		
Bloomington MSA	Limited-Scope	McLean County
Champaign-Urbana MSA	Full-Scope	Champaign County
Danville MSA	Limited-Scope	Vermilion County
IL non-MSA	Full-Scope	Clark, Coles, Crawford, Cumberland, Edgar, Franklin, Jasper, Jefferson, Lawrence, Livingston, Marion, Richland, and Wayne Counties
Indiana		
Evansville MSA	Limited-Scope	Vanderburgh County
Indianapolis-Carmel-Anderson MSA	Limited-Scope	Putnam County
IN non-MSA	Full-Scope	Daviess, Gibson (partial), Greene, and Knox Counties
Terre Haute MSA	Full-Scope	Clay, Parke, Sullivan, Vermilion, and Vigo Counties
Kentucky		
KY non-MSA	Full-Scope	Calloway, Fulton, Marshall, and Todd Counties
Tennessee		
TN non-MSA	Limited-Scope	Houston County
Nashville-Davidson-Murfreesboro-Franklin MSA	Full-Scope	Cheatham County

Appendix B: Summary of MMSA and State Ratings

RATINGS First Financial Bank, National Association				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
First Financial	Outstanding	Low Satisfactory	High Satisfactory	Satisfactory
MMSA or State:				
TN-KY MMSA	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Illinois	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Indiana	Outstanding	Low Satisfactory	High Satisfactory	Satisfactory
Kentucky	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
Tennessee	Low Satisfactory	Low Satisfactory	Low 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

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 §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/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.

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 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 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/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. 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.

Multistate Metropolitan Statistical Area Rating

Clarksville, TN-KY MMSA

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2019-20
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	
KY-TN MMSA	80	12,808	100.0	14,268	1.9	2.5	0.4	9.6	10.0	7.4	60.3	55.0	60.5	27.9	32.5	31.5	0.3	0.0	0.2	
Total	80	12,808	100.0	14,268	1.9	2.5	0.4	9.6	10.0	7.4	60.3	55.0	60.5	27.9	32.5	31.5	0.3	0.0	0.2	

Source: 2015 ACS Census; 01/01/2019 - 12/31/2020 Bank Data, 2019 HMDA Aggregate 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																				2019-20
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	
KY-TN MMSA	80	12,808	100.0	14,268	20.4	5.1	3.2	18.0	19.0	12.2	21.2	19.0	24.8	40.4	43.8	33.4	0.0	13.9	26.4	
Total	80	12,808	100.0	14,268	20.4	5.1	3.2	18.0	19.0	12.2	21.2	19.0	24.8	40.4	43.8	33.4	0.0	13.9	26.4	

Source: 2015 ACS Census; 01/01/2019 - 12/31/2020 Bank Data, 2019 HMDA Aggregate 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																			2019-20	
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	
KY-TN M MSA	127	14,940	100.0	3,037	6.2	10.2	5.9	15.3	17.3	12.1	49.2	45.7	46.1	25.6	25.2	33.3	3.7	1.6	2.6	
Total	127	14,940	100.0	3,037	6.2	10.2	5.9	15.3	17.3	12.1	49.2	45.7	46.1	25.6	25.2	33.3	3.7	1.6	2.6	

Source: 2020 D&B Data; 01/01/2019 - 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												2019-20	
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		
KY-TN MMSA	127	14,940	100.0	3,037	85.4	25.2	49.4	3.2	24.4	11.4	50.4		
Total	127	14,940	100.0	3,037	85.4	25.2	49.4	3.2	24.4	11.4	50.4		

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

State of Illinois

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2018-20**

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
Bloomington MSA	56	8,570	6.0	5,502	2.3	8.9	2.7	14.3	14.3	11.6	53.9	42.9	50.5	29.5	33.9	35.2	0.0	0.0	0.0
Champaign-Urbana MSA	124	35,881	13.3	4,904	5.5	7.3	5.6	12.1	9.7	10.3	57.6	58.1	57.4	24.7	25.0	26.5	0.1	0.0	0.2
Danville MSA	197	21,197	21.2	1,182	2.8	0.0	1.1	11.4	8.6	3.8	49.6	46.2	49.3	36.2	45.2	45.8	0.0	0.0	0.0
IL Non-MSA	552	40,277	59.4	4,739	0.2	0.2	0.0	17.1	21.9	16.8	70.9	66.1	70.1	11.6	11.8	12.7	0.1	0.0	0.3
Total	929	105,924	100.0	16,327	2.0	1.6	2.7	14.9	17.0	12.2	62.2	59.4	58.2	20.8	22.0	26.8	0.1	0.0	0.1

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2019 HMDA Aggregate 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

2018-20

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
Bloomington MSA	56	8,570	6.0	5,502	19.4	7.1	12.0	17.3	16.1	19.8	22.2	21.4	21.0	41.1	48.2	28.1	0.0	12.1	19.1
Champaign-Urbana MSA	124	35,881	13.3	4,904	22.5	12.1	9.4	16.6	21.0	18.3	20.4	21.0	20.6	40.5	37.1	35.8	0.0	15.5	15.8
Danville MSA	197	21,197	22.8	1,182	21.7	10.2	5.9	16.8	20.3	18.2	20.7	27.4	23.9	40.8	39.6	33.7	0.0	5.6	18.3
IL Non-MSA	552	40,277	59.4	4,739	22.4	14.9	10.4	18.1	29.9	21.3	21.6	23.7	22.1	37.9	28.8	30.5	0.0	2.7	15.7
Total	929	105,924	100.0	16,327	21.7	12.4	10.3	17.4	25.8	19.7	21.4	24.0	21.4	39.5	33.4	31.5	0.0	4.4	17.1

Source: 2015 ACS Census ; 01/01/2018 - 12/31/2020 Bank Data, 2019 HMDA Aggregate 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 **2018-20**

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
Bloomington MSA	111	12,039	11.6	2,459	8.3	14.4	8.0	12.6	23.4	12.6	55.2	49.6	47.0	23.8	12.6	32.5	0.0	0.0	0.0
Champaign-Urbana MSA	108	11,520	11.2	2,796	10.7	15.7	10.9	18.4	11.1	17.8	41.6	50.9	43.6	26.7	22.2	26.5	2.6	0.0	1.1
Danville MSA	261	19,179	27.2	723	3.6	0.4	3.7	22.6	16.1	18.3	42.8	41.0	39.6	31.0	42.5	38.5	0.0	0.0	0.0
IL Non-MSA	481	34,164	50.1	3,436	1.9	2.3	1.9	25.3	20.0	21.4	60.3	63.8	64.2	12.1	10.0	12.0	0.4	4.0	0.4
Total	961	76,902	100.0	9,414	5.9	4.7	6.3	20.3	18.3	17.8	52.5	54.5	51.7	20.3	20.5	23.7	0.9	2.0	0.5

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 **2018-20**

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
Bloomington MSA	111	12,039	11.6	2,459	80.2	45.0	44.8	5.3	28.8	14.5	26.1
Champaign-Urbana MSA	108	11,520	11.2	2,796	79.8	45.4	47.2	4.8	25.9	15.4	28.7
Danville MSA	261	19,179	27.2	723	75.9	63.6	44.1	5.8	15.7	18.4	20.7
IL Non-MSA	481	34,164	50.1	3,436	77.2	60.1	47.8	5.6	15.2	17.2	24.7
Total	961	76,902	100.0	9,414	78.5	57.6	46.5	5.3	18.1	16.2	24.2

*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 S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2018-20**

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
Bloomington MSA	6	2,194	4.4	392	1.8	0.0	1.0	6.9	0.0	0.8	69.5	283.3	80.4	21.8	0.0	17.9	0.0	0.0	0.0
Champaign-Urbana MSA	0	0	0.0	180	3.5	0.0	0.6	6.9	0.0	1.7	68.0	0.0	76.7	21.4	0.0	21.1	0.2	0.0	0.0
Danville MSA	24	4,113	9.2	147	0.0	0.0	0.0	3.7	0.0	0.7	42.9	66.7	34.7	53.5	83.3	64.6	0.0	0.0	0.0
IL Non-MSA	351	44,713	86.4	1,110	0.1	0.0	0.0	7.7	3.7	4.1	79.0	79.2	81.4	13.1	13.1	14.6	0.0	0.0	0.0
Total	402	51,020	100.0	1,829	1.0	0.0	0.3	7.1	3.2	2.8	72.4	77.4	76.9	19.5	16.4	20.0	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 T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2018-20	
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	
Bloomington MSA	17	2,194	4.4	392	96.8	100.0	66.6	1.6	0.0	1.6	0.0	
Champaign-Urbana MSA	--	--	--	180	95.8	--	45.0	1.4	--	2.7	--	
Danville MSA	36	4,113	9.2	147	97.3	88.9	53.1	1.7	11.1	1.0	0.0	
IL Non-MSA	337	44,713	86.4	1,110	98.4	91.1	64.5	0.7	8.0	0.8	0.9	
Total	390	51,020	100.0	1,829	97.6	91.3	62.1	1.1	7.9	1.3	0.8	

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%

State of Indiana

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2018
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
Terre Haute MSA 2018	741	60,133	100.0	3,678	2.7	2.7	1.8	13.1	10.9	12.6	49.2	49.4	48.2	35.0	37.0	37.4	0.0	0.0	0.0
Total	741	60,133	100.0	3,678	2.7	2.7	1.8	13.1	10.9	12.6	49.2	49.4	48.2	35.0	37.0	37.4	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-20
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
Terre Haute MSA 2019-2020	1,625	180,773	100.0	4,333	2.4	1.3	1.3	13.8	10.0	12.0	52.3	50.2	52.0	31.5	38.5	34.7	0.0	0.0	0.0
Total	1,625	180,773	100.0	4,333	2.4	1.3	1.3	13.8	10.0	12.0	52.3	50.2	52.0	31.5	38.5	34.7	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2019 - 12/31/2020 Bank Data, 2019 HMDA Aggregate 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 **2018**

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
Terre Haute M SA 2018	741	60,133	100.0	3,678	21.2	11.7	9.4	17.8	21.1	19.7	20.4	22.8	21.8	40.6	36.4	34.1	0.0	8.0	15.0
Total	741	60,133	100.0	3,678	21.2	11.7	9.4	17.8	21.1	19.7	20.4	22.8	21.8	40.6	36.4	34.1	0.0	8.0	15.0

Source: 2015 ACS Census ; 01/01/2018 - 12/31/2018 Bank Data, 2018 HMDA Aggregate 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 **2019-20**

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
Terre Haute M SA 2019-2020	1,625	180,773	100.0	4,333	21.2	8.0	7.3	18.2	20.5	19.1	20.5	21.7	22.8	40.0	41.4	34.8	0.0	8.5	15.9
Total	1,625	180,773	100.0	4,333	21.2	8.0	7.3	18.2	20.5	19.1	20.5	21.7	22.8	40.0	41.4	34.8	0.0	8.5	15.9

Source: 2015 ACS Census ; 01/01/2019 - 12/31/2020 Bank Data, 2019 HMDA Aggregate 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																				2018
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	
Terre Haute MS A 2018	406	51,206	100.0	1,720	5.9	10.8	8.4	20.4	13.1	16.7	42.2	39.2	41.1	31.6	36.9	33.8	0.0	0.0	0.0	
Total	406	51,206	100.0	1,720	5.9	10.8	8.4	20.4	13.1	16.7	42.2	39.2	41.1	31.6	36.9	33.8	0.0	0.0	0.0	

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate 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																				2019-20
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	
Terre Haute MS A 2019-2020	1,599	158,761	100.0	2,194	5.4	10.0	7.4	19.1	16.1	16.8	45.8	45.5	46.2	29.7	28.4	29.6	0.0	0.0	0.0	
Total	1,599	158,761	100.0	2,194	5.4	10.0	7.4	19.1	16.1	16.8	45.8	45.5	46.2	29.7	28.4	29.6	0.0	0.0	0.0	

Source: 2020 D&B Data; 01/01/2019 - 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
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
Terre Haute M SA 2018	406	51,206	100.0	1,720	75.7	60.1	41.7	6.8	39.9	17.5	0.0
Total	406	51,206	100.0	1,720	75.7	60.1	41.7	6.8	39.9	17.5	0.0
<i>Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019-20
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
Terre Haute M SA 2019-2020	1,599	158,761	100.0	2,194	79.9	44.8	42.5	5.2	23.0	14.9	32.2
Total	1,599	158,761	100.0	2,194	79.9	44.8	42.5	5.2	23.0	14.9	32.2
<i>Source: 2020 D&B Data; 01/01/2019 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2018
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
Terre Haute MSA	191	20,901	100.0	326	1.1	0.0	0.0	5.5	0.5	1.2	50.6	37.7	50.9	42.8	61.8	47.9	0.0	0.0	0.0
Total	191	20,901	100.0	326	1.1	0.0	0.0	5.5	0.5	1.2	50.6	37.7	50.9	42.8	61.8	47.9	0.0	0.0	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate 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																			2019-20
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
Terre Haute MSA	477	52,283	100.0	417	1.3	0.0	0.0	7.5	4.0	4.6	57.1	47.6	58.0	34.1	48.4	37.4	0.0	0.0	0.0
Total	477	52,283	100.0	417	1.3	0.0	0.0	7.5	4.0	4.6	57.1	47.6	58.0	34.1	48.4	37.4	0.0	0.0	0.0

Source: 2020 D&B Data; 01/01/2019 - 12/31/2020 Bank Data; 2019 CRA Aggregate 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											2018
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
Terre Haute MSA	191	20,901	100.0	326	98.0	90.6	76.7	0.9	9.4	1.1	0.0
Total	191	20,901	100.0	326	98.0	90.6	76.7	0.9	9.4	1.1	0.0
<i>Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2019-20
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
Terre Haute MSA	477	52,283	100.0	449	97.8	85.3	71.5	0.8	13.2	1.3	1.5
Total	477	52,283	100.0	449	97.8	85.3	71.5	0.8	13.2	1.3	1.5
<i>Source: 2020 D&B Data; 01/01/2019 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2018
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
IN Non-MSA	131	10,976	100.0	3,324	0.0	0.0	0.0	11.6	21.4	10.6	64.0	51.1	63.0	24.4	27.5	26.4	0.0	0.0	0.0
Total	131	10,976	100.0	3,324	0.0	0.0	0.0	11.6	21.4	10.6	64.0	51.1	63.0	24.4	27.5	26.4	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
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
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
IN Non-MSA 2019	69	5,375	100.0	3,146	0.0	0.0	0.0	10.4	21.7	9.0	61.9	40.6	60.3	27.7	37.7	30.7	0.0	0.0	0.0
Total	69	5,375	100.0	3,146	0.0	0.0	0.0	10.4	21.7	9.0	61.9	40.6	60.3	27.7	37.7	30.7	0.0	0.0	0.0

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020
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
IN Non-MSA 2020	76	6,715	100.0	2,094	0.0	0.0	0.0	14.5	15.8	13.5	56.9	48.7	56.4	28.6	35.5	30.1	0.0	0.0	0.0
Total	76	6,715	100.0	2,094	0.0	0.0	0.0	14.5	15.8	13.5	56.9	48.7	56.4	28.6	35.5	30.1	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2020 - 12/31/2020 Bank Data, 2019 HMDA Aggregate 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																			2018
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
IN Non-MSA	131	10,976	100.0	3,324	18.0	17.6	9.1	18.6	25.2	22.0	22.3	22.9	21.6	41.0	31.3	32.6	0.0	3.1	14.7
Total	131	10,976	100.0	3,324	18.0	17.6	9.1	18.6	25.2	22.0	22.3	22.9	21.6	41.0	31.3	32.6	0.0	3.1	14.7

Source: 2015 ACS Census ; 01/01/2018 - 12/31/2018 Bank Data, 2018 HMDA Aggregate 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																			2019
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
IN Non-MSA 2019	69	5,375	100.0	3,146	17.6	5.8	8.6	18.2	21.7	21.8	22.4	26.1	25.5	41.9	36.2	31.4	0.0	10.1	12.7
Total	69	5,375	100.0	3,146	17.6	5.8	8.6	18.2	21.7	21.8	22.4	26.1	25.5	41.9	36.2	31.4	0.0	10.1	12.7

*Source: 2015 ACS Census ; 01/01/2019 - 12/31/2019 Bank Data, 2019 HMDA Aggregate 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																			2020
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
IN Non-MSA 2020	76	6,715	100.0	2,094	18.5	9.2	8.7	17.9	9.2	21.6	22.8	27.6	25.8	40.8	40.8	30.7	0.0	13.2	13.2
Total	76	6,715	100.0	2,094	18.5	9.2	8.7	17.9	9.2	21.6	22.8	27.6	25.8	40.8	40.8	30.7	0.0	13.2	13.2

*Source: 2015 ACS Census ; 01/01/2020 - 12/31/2020 Bank Data, 2019 HMDA Aggregate 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																				2018
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	
IN Non-MSA	225	26,915	100.0	1,930	0.0	0.0	0.0	13.7	10.2	10.0	65.3	75.1	65.9	21.0	14.7	24.1	0.0	0.0	0.0	
Total	225	26,915	100.0	1,930	0.0	0.0	0.0	13.7	10.2	10.0	65.3	75.1	65.9	21.0	14.7	24.1	0.0	0.0	0.0	

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate 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																				2019
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	
IN Non-MSA 2019	127	19,825	100.0	1,868	0.0	0.0	0.0	13.6	10.2	9.5	62.6	65.4	65.4	23.8	24.4	25.1	0.0	0.0	0.0	
Total	127	19,825	100.0	1,868	0.0	0.0	0.0	13.6	10.2	9.5	62.6	65.4	65.4	23.8	24.4	25.1	0.0	0.0	0.0	

Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; 2019 CRA Aggregate 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																				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	
IN Non-MSA 2020	211	31,648	100.0	1,559	0.0	0.0	0.0	18.0	17.1	11.4	58.9	59.2	65.6	23.2	23.7	23.0	0.0	0.0	0.0	
Total	211	31,648	100.0	1,559	0.0	0.0	0.0	18.0	17.1	11.4	58.9	59.2	65.6	23.2	23.7	23.0	0.0	0.0	0.0	

Source: 2020 D&B Data; 01/01/2020 - 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
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	
IN Non-MSA	225	26,915	100.0	1,930	78.2	61.8	45.9	5.7	38.2	16.1	0.0	
Total	225	26,915	100.0	1,930	78.2	61.8	45.9	5.7	38.2	16.1	0.0	

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 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												2019
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	
IN Non-MSA 2019	127	19,825	100.0	1,868	79.8	59.8	43.5	5.2	40.2	15.0	0.0	
Total	127	19,825	100.0	1,868	79.8	59.8	43.5	5.2	40.2	15.0	0.0	
<i>Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; 2019 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>												

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												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	
IN Non-MSA 2020	211	31,648	100.0	1,559	82.3	54.5	43.2	4.7	23.2	13.0	22.3	
Total	211	31,648	100.0	1,559	82.3	54.5	43.2	4.7	23.2	13.0	22.3	
<i>Source: 2020 D&B Data; 01/01/2020 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>												

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2018**

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
IN Non-MSA	121	12,995	100.0	624	0.0	0.0	0.0	3.4	6.6	3.7	67.7	71.1	71.3	28.9	22.3	25.0	0.0	0.0	0.0
Total	121	12,995	100.0	624	0.0	0.0	0.0	3.4	6.6	3.7	67.7	71.1	71.3	28.9	22.3	25.0	0.0	0.0	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate 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 **2019**

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
IN Non-MSA 2019	64	9,375	100.0	576	0.0	0.0	0.0	2.1	6.3	2.3	65.3	57.8	66.5	32.6	35.9	31.3	0.0	0.0	0.0
Total	64	9,375	100.0	576	0.0	0.0	0.0	2.1	6.3	2.3	65.3	57.8	66.5	32.6	35.9	31.3	0.0	0.0	0.0

Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; 2019 CRA Aggregate 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 **2020**

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
IN Non-MSA 2020	68	7,405	100.0	505	0.0	0.0	0.0	2.3	1.5	2.6	66.9	47.1	66.7	30.8	51.5	30.7	0.0	0.0	0.0
Total	68	7,405	100.0	505	0.0	0.0	0.0	2.3	1.5	2.6	66.9	47.1	66.7	30.8	51.5	30.7	0.0	0.0	0.0

Source: 2020 D&B Data; 01/01/2020 - 12/31/2020 Bank Data; 2019 CRA Aggregate 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 **2018**

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
IN Non-MSA	121	12,995	100.0	624	97.0	84.3	65.1	1.8	15.7	1.3	0.0
Total	121	12,995	100.0	624	97.0	84.3	65.1	1.8	15.7	1.3	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate 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											2019
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
IN Non-MSA 2019	64	9,375	100.0	576	96.8	67.2	62.7	1.9	32.8	1.3	0.0
Total	64	9,375	100.0	576	96.8	67.2	62.7	1.9	32.8	1.3	0.0

Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; 2019 CRA Aggregate 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											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
IN Non-MSA 2020	68	7,405	100.0	505	96.3	54.4	63.0	2.0	33.8	1.7	11.8
Total	68	7,405	100.0	505	96.3	54.4	63.0	2.0	33.8	1.7	11.8

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2018-20

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
Evansville MSA	28	5,419	27.7	6,617	9.5	17.9	5.2	19.6	46.4	19.3	35.5	17.9	33.5	35.3	17.9	41.8	0.1	0.0	0.2
Indianapolis MSA	73	7,464	72.3	1,412	0.0	0.0	0.0	18.2	21.9	14.3	81.8	78.1	85.7	0.0	0.0	0.0	0.0	0.0	0.0
Total	101	12,883	100.0	8,029	7.9	5.0	4.3	19.4	28.7	18.4	43.2	61.4	42.7	29.4	5.0	34.4	0.1	0.0	0.1

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2019 HMDA Aggregate 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 2018-20

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
Evansville MSA	28	5,419	27.7	6,617	24.1	--	10.3	18.7	20.0	22.5	19.9	10.0	20.4	37.3	17.9	27.6	0.0	71.4	19.1
Indianapolis MSA	73	7,464	76.1	1,412	20.5	9.6	12.5	22.6	27.4	25.1	21.7	37.0	19.8	35.2	20.5	24.9	0.0	7.4	17.8
Total	101	12,883	100.0	8,029	23.5	6.9	10.7	19.3	21.8	23.0	20.2	27.7	20.3	36.9	19.8	27.1	0.0	23.8	18.9

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2019 HMDA Aggregate 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 **2018-20**

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
Evansville MSA	116	21,833	46.2	2,911	11.1	6.9	11.3	26.4	32.8	26.2	29.4	30.2	27.4	26.2	20.7	29.4	6.8	9.5	5.7
Indianapolis MSA	135	12,605	53.8	451	0.0	0.0	0.0	16.9	11.1	20.8	83.1	88.9	79.2	0.0	0.0	0.0	0.0	0.0	0.0
Total	251	34,438	100.0	3,362	9.5	3.2	9.8	25.1	21.1	25.5	37.2	61.8	34.4	22.5	9.6	25.4	5.8	4.4	4.9

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 **2018-20**

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
Evansville MSA	116	21,833	46.2	2,911	80.2	56.9	39.1	7.0	32.8	12.8	10.3
Indianapolis MSA	135	12,605	53.8	451	84.5	68.1	44.3	3.1	27.4	12.4	4.4
Total	251	34,438	100.0	3,362	80.8	62.9	39.8	6.4	29.9	12.7	7.2

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%

State of Kentucky

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2019-20
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	
KY Non-MSA	79	13,059	100.0	1,622	0.0	0.0	0.0	7.3	8.9	7.6	58.1	46.8	52.4	34.6	44.3	40.0	0.0	0.0	0.0	
Total	79	13,059	100.0	1,622	0.0	0.0	0.0	7.3	8.9	7.6	58.1	46.8	52.4	34.6	44.3	40.0	0.0	0.0	0.0	

Source: 2015 ACS Census; 01/01/2019 - 12/31/2020 Bank Data, 2019 HMDA Aggregate 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																				2019-20
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	
KY Non-MSA	79	13,059	100.0	1,622	16.6	9.0	3.3	16.2	9.0	14.1	18.6	17.9	20.7	48.5	56.4	48.5	0.0	8.9	13.5	
Total	79	13,059	100.0	1,622	16.6	9.0	3.3	16.2	9.0	14.1	18.6	17.9	20.7	48.5	56.4	48.5	0.0	8.9	13.5	

Source: 2015 ACS Census; 01/01/2019 - 12/31/2020 Bank Data, 2019 HMDA Aggregate 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																				2019-20
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	
KY Non-MSA	105	10,694	100.0	1,053	0.0	0.0	0.0	16.2	19.0	17.0	50.7	40.0	53.9	33.1	41.0	29.1	0.0	0.0	0.0	
Total	105	10,694	100.0	1,053	0.0	0.0	0.0	16.2	19.0	17.0	50.7	40.0	53.9	33.1	41.0	29.1	0.0	0.0	0.0	

*Source: 2020 D&B Data; 01/01/2019 - 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												2019-20
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	
KY Non-MSA	105	10,694	100.0	1,053	83.1	37.1	49.9	4.2	13.3	12.7	49.5	
Total	105	10,694	100.0	1,053	83.1	37.1	49.9	4.2	13.3	12.7	49.5	

*Source: 2020 D&B Data; 01/01/2019 - 12/31/2020 Bank Data; 2019 CRA Aggregate 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																			2019-20
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
KY Non-MSA	42	4,291	100.0	150	0.0	0.0	0.0	8.8	19.0	13.3	65.9	64.3	62.0	25.4	16.7	24.7	0.0	0.0	0.0
Total	42	4,291	100.0	150	0.0	0.0	0.0	8.8	19.0	13.3	65.9	64.3	62.0	25.4	16.7	24.7	0.0	0.0	0.0

Source: 2020 D&B Data; 01/01/2019 - 12/31/2020 Bank Data; 2019 CRA Aggregate 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											2019-20
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
KY Non-MSA	42	4,291	100.0	150	98.6	88.1	51.3	0.9	7.1	0.5	4.8
Total	42	4,291	100.0	150	98.6	88.1	51.3	0.9	7.1	0.5	4.8

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

State of Tennessee

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2019-20**

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
Nashville MSA	44	7,739	86.3	1,953	0.0	0.0	0.0	41.3	36.4	41.3	58.7	63.6	58.7	0.0	0.0	0.0	0.0	0.0	0.0
TN Non-MSA	7	493	13.7	237	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	51	8,232	100.0	2,190	0.0	0.0	0.0	34.3	31.4	36.8	65.7	68.6	63.2	0.0	0.0	0.0	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2019 - 12/31/2020 Bank Data, 2019 HMDA Aggregate 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 **2019-20**

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
Nashville MSA	44	7,739	87.8	1,953	23.3	13.9	5.5	19.3	25.0	20.8	21.9	31.8	23.2	35.6	31.8	32.8	0.0	--	17.6
TN Non-MSA	7	493	20.0	237	19.2	28.6	3.8	15.4	50.0	10.5	25.7	--	20.3	39.8	21.4	48.1	0.0	--	17.3
Total	51	8,232	100.0	2,190	22.6	13.7	5.3	18.6	23.5	19.7	22.6	27.5	22.9	36.3	35.3	34.5	0.0	--	17.6

Source: 2015 ACS Census; 01/01/2019 - 12/31/2020 Bank Data, 2019 HMDA Aggregate 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 **2019-20**

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
Nashville MSA	34	1,270	89.5	658	0.0	0.0	0.0	39.7	26.5	40.0	60.3	73.5	60.0	0.0	0.0	0.0	0.0	0.0	0.0
TN Non-MSA	4	371	10.5	44	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	38	1,641	100.0	702	0.0	0.0	0.0	34.3	23.7	37.5	65.7	76.3	62.5	0.0	0.0	0.0	0.0	0.0	0.0

Source: 2020 D&B Data; 01/01/2019 - 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 **2019-20**

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
Nashville MSA	34	1,270	89.5	658	89.9	5.9	51.5	2.3	8.8	7.9	85.3
TN Non-MSA	4	371	10.5	44	82.9	25.0	56.8	4.7	0.0	12.4	75.0
Total	38	1,641	100.0	702	88.9	7.9	51.9	2.6	7.9	8.5	84.2

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