



Office of the  
Comptroller of the Currency  
Washington, DC 20219

# **INTERMEDIATE SMALL BANK**

## **PUBLIC DISCLOSURE**

August 11, 2025

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

United Midwest Savings Bank, National Association  
Charter Number: 25160

101 South Main Street  
DeGraff, OH 43318

Office of the Comptroller of the Currency

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Metro Place V  
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Dublin, OH 43017

**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 Lending Test is rated: Satisfactory.**

**The Community Development Test is rated: Outstanding.**

The major factors that support this rating include:

- The Lending Test rating is based on satisfactory performance in the state of Ohio. United Midwest Savings Bank, National Association (United Midwest or bank) exhibits a reasonable distribution of loans among borrowers and geographies of different income levels, based on the bank's non-traditional business model discussed under the "Description of Institution" section of this report.
- The Community Development (CD) Test rating is based on excellent performance in the state of Ohio. United Midwest demonstrates excellent responsiveness to CD needs and opportunities, specifically in the Columbus, Ohio Metropolitan Statistical Area (MSA) by engaging in a combination of CD loans, qualified investments, and CD services.
- United Midwest's loan-to-deposit (LTD) ratio is more than reasonable and compares favorably to peer financial institutions with the assessment areas (AAs).
- United Midwest has not received any complaints about its Community Reinvestment Act (CRA) performance in helping to meet the AAs' credit needs during the evaluation period.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio is more than reasonable.

United Midwest's quarterly average LTD ratio over the nine quarters (December 31, 2021, to December 31, 2023) since the previous CRA Performance Evaluation was 87.29 percent. The ratio ranged from a high of 94.32 percent as of December 31, 2021, to a low of 75.81 percent as of December 31, 2023. The bank's quarterly average LTD ratio compared favorably to the quarterly average LTD ratio of 81.56 percent for similarly situated financial institutions headquartered in Champaign, Darke, Franklin, Logan, and Preble Counties in Ohio. The custom peer group consisted of ten financial institutions with total assets between \$100 million and \$650 million, and quarterly average LTD ratios ranging from 59.07 percent to 105.60 percent. United Midwest ranked third highest out of the similarly situated financial institutions in the AAs for an average LTD ratio during the evaluation period.

### Lending in Assessment Area

A substantial majority of the bank's loans are outside its AAs.

The bank originated and purchased 1.92 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.

Table 1: Lending Inside and Outside of the Assessment Area									2021-2023	
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	145	100.00	0	0.00	145	28,115	100.00	0	0.00	28,115
Small Business	31	1.58	1,927	98.42	1,958	2,889	0.85	337,678	99.15	340,568
Consumer	231	1.21	18,822	98.79	19,053	1,442	1.03	138,876	98.97	140,318
<b>Total</b>	<b>407</b>	<b>1.92</b>	<b>20,749</b>	<b>98.08</b>	<b>21,156</b>	<b>32,447</b>	<b>6.37</b>	<b>476,554</b>	<b>93.63</b>	<b>509,001</b>

Source: 1/1/2021 - 12/31/2023 Bank Data.  
Due to rounding, totals may not equal 100.0%.

Because a random sample of 20 small business and consumer loans would yield an insignificant number of loans to borrowers within the AAs, the Office of the Comptroller of the Currency (OCC or examiners) completed a portfolio wide analysis of lending in the AAs using the bank's internal loan reports from 2021 to 2023. The internal bank reports were validated and determined to be accurate and reliable. The above table displays the total number and dollar volume of loans made in any of the bank's AAs for the primary products during 2021, 2022, and 2023. The percentages are similar to the CRA Performance Evaluation dated January 31, 2022.

Despite the low volume of lending within the AAs, performance within the AAs is overall adequate. United Midwest's non-traditional business model and CD activities within the AAs mitigate the results of the in/out analysis and overall low volume of lending in the AAs.

Analysis of peer data and active institutions in each AA indicates that the communities are not lacking access to financial services. United Midwest had a small percentage of deposit market share in relation to its competition in each AA.

Overall lending activity decreased from the previous CRA performance evaluation, which analyzed lending activity in 2018, 2019, and 2020. However, lending activity performance within the AAs was overall stable when compared to the previous CRA performance evaluation.

The bank focuses on originating home mortgage loans to low- and moderate-income borrowers and/or in low- and moderate-income areas. Additionally, the bank developed a mortgage product, MyPlace, that benefits low- and moderate-income borrowers, which is discussed below in the performance evaluation. The bank does not originate home mortgage loans outside the AAs or nationwide.

## Description of Institution

United Midwest is a national bank and a wholly owned subsidiary of MSB Capital Corporation, a one-bank holding company. The bank is headquartered in DeGraff, Ohio, in Logan County, and the holding company is headquartered in Westerville, Ohio, in Franklin County. As of December 31, 2023, total assets were \$477 million with \$299 million in net loans and leases, \$394 million in total deposits, and \$59 million in tier 1 capital. There was no merger or acquisition activity that affected the scope of the bank's operations during the evaluation period.

During the evaluation period, United Midwest operated the main office in DeGraff, Ohio, in Logan County. The bank had one branch in West Manchester, Ohio, in Preble County. The bank had three branches in Franklin County, Ohio, two in Columbus and one in Westerville. Management did not open or close any branches during the evaluation period. As of December 31, 2023, all branches were in

middle- and upper-income census tracts (CTs) except for the Westerville Branch in Franklin County, which was in a moderate-income CT. All offices have drive-up facilities, except for the West Manchester Branch. All offices have 24-hour automated teller machines (ATMs) except for the Columbus Branch on Reed Road. The bank maintains standard operating hours at all branches. Additionally, United Midwest has one loan production office (LPO) in Cleveland, Ohio for consumer loan originations and one LPO in Panama City, Florida for smaller Small Business Administration (SBA) loan originations.

United Midwest is a single state financial institution with two AAs and one rating area (Ohio). There were no changes to the bank's AAs during the evaluation period. The AAs are also described in the "Scope of the Evaluation" and "Description of Institution's Operations in Ohio" sections of this performance evaluation. The AAs are as follows:

- Franklin County, Ohio, in the Columbus, Ohio MSA 18140 (Columbus MSA).
- Champaign, Darke, Logan, and Preble counties in Ohio in a Non-MSA (OH Non-MSA).

As of the December 31, 2023, Consolidated Reports of Condition and Income (Call Report) and Uniform Bank Performance Reports (UBPR), United Midwest's total loans were approximately \$305 million representing approximately 64 percent of total assets. The bank offers a variety of lending and deposit products and services through its five branches to accommodate its customers, including business, home mortgage, and consumers loans, as well as online, mobile, and telephone banking. The bank's deposits are gathered from communities surrounding the branch offices in a traditional manner. However, loan operations are not traditional in nature. United Midwest's lending model is to originate two specialty products to a nationwide market, mostly through third-party sources. The primary products are highly specialized niches within the commercial and consumer loan markets. The bank's primary business focus is commercial and consumer loans on a nationwide basis, and home mortgage loans within their AAs. The bank's loan portfolio, as of the December 31, 2023, Call Report, was comprised of commercial and commercial real estate loans (business) of 67 percent, consumer loans of 17 percent, residential real estate (home mortgage) loans of 15 percent, and approximately 1 percent in other loans.

Presently, no legal or financial impediments exist that could restrict or affect United Midwest's ability to meet the credit needs of its AAs. The previous CRA rating was Satisfactory as of the Performance Evaluation dated January 31, 2022.

### ***Commercial Lending***

The primary lending activity is focused on commercial loans through various U.S. government lending programs such as the SBA or U.S. Department of Agriculture (USDA). Due to the specialized credit markets in which the bank participates, the borrower base is nationwide with no apparent geographic concentrations.

The bank has two SBA lending operations: a large loan SBA lending operation primarily focusing on SBA guaranteed loans of \$500,000 or more to large businesses in certain industries, and a small SBA lending operation focusing on SBA guaranteed loans of \$150,000 or less to borrowers primarily for start-up franchise businesses. SBA loan applications are generally through national referral sources. Many SBA loans originated during the evaluation period were for small or start-up businesses with less than \$1 million in historical annual revenues. Most commercial loans originated during the evaluation period were SBA 7(a) program loans.

The bank's large SBA lending activity is focused on commercial loans that qualify for partial guarantees through various U.S. government lending programs, including the SBA and USDA. The bank's large loan SBA lending program focuses on borrowers in certain industries, including medical practices, dental practices, optometry practices, veterinary practices, funeral homes, insurance agencies, and hospitality.

According to the U.S. SBA, in 2023 United Midwest was ranked 17<sup>th</sup> largest lender in the nation for total number of SBA loans approved and 30<sup>th</sup> largest in total dollar volume of SBA approved loans, behind large banks including Huntington National Bank, U.S. Bank, National Association (N.A.), and Wells Fargo Bank, N.A.

The COVID-19 pandemic in 2021 impacted the national and local economy. As a result, the bank provided SBA Paycheck Protection Program (PPP) loans to help businesses keep their workforces employed. In total, the bank originated 186 SBA PPP loans totaling \$16.5 million, with 55 PPP loans totaling \$8.3 million in Ohio. Within the bank's AAs, the bank originated 21 SBA PPP loans totaling \$3.4 million.

### ***Consumer Lending***

Similar to the commercial line of business, the consumer loan portfolio consists of a nationwide borrowing base and a narrow niche market. Consumer lending focuses on loans to individuals for purchase of certain goods and services from approved dealers and retailers nationwide. Most of the loans are to finance small dollar loans to purchase pianos, musical instruments, elective health services, safes, and other consumer goods. For certain products and services, United Midwest relies on third-party sources to help establish relationships with vendors. A small number of traditional consumer loans have been originated through the bank's local retail branch network as well.

### ***Residential Real Estate***

United Midwest continues to originate residential real estate loans (home mortgage) within the bank's AAs, focusing on making loans to low- and moderate-income borrowers and in low- and moderate-income areas. For this purpose, the bank developed a product, MyPlace, that benefits low- and moderate-income borrowers. The product has a lower than market interest rate, with lender paid closing costs or discount points. The bank advertises this product in local newspapers, by direct mail, and with signage in the branch offices. MyPlace is specifically designed to assist low- and moderate-income individuals and families with purchasing or refinancing a home within the bank's AAs, which is a primary credit need in the AAs. During the evaluation period, the bank originated 145 home mortgage loans. All the home mortgage loan originations were inside the AAs. Mortgage loan competition is very strong in the AAs, with competition from many large banks. Bank management considers home mortgage lending a primary product in the bank's Columbus MSA and OH Non-MSA, as the bank only originates mortgage loans within the AAs and not on a nationwide basis. Therefore, the OCC included home mortgage lending as a primary product during this evaluation.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

This performance evaluation assessed the bank's record of meeting the credit and CD needs of its entire community, including low- and moderate-income areas. United Midwest met the threshold of an intermediate small bank for CRA purposes beginning as of January 1, 2022. As of January 1, 2021, to December 31, 2021, the bank was a small bank for CRA purposes. As such, the bank was not subject to the CD requirements for intermediate small banks in 2021. However, the bank opted to provide 2021 CD loan, investment and service activities during this evaluation. Therefore, the OCC used intermediate small bank CRA evaluation procedures to assess the bank's performance under the Lending and CD Tests. The OCC analyzed lending activity in full-year increments during the evaluation period, January 1, 2021, to December 31, 2023.

Based on discussions with management and the number and dollar volume of loan origination and purchase data supplied by the bank during the evaluation period, United Midwest's primary lending focus is small loans to businesses (small business or business loans) and consumer loans on a nationwide basis, and home mortgage loans within the AAs. As such, the OCC evaluated the bank's lending performance based on these three primary lending products. Based on the number of loans originated and purchased during the evaluation period, business loans accounted for 9.88 percent, consumer loans accounted for 89.44 percent, and home mortgage accounted for 0.68 percent. Based on the dollar volume of loans originated and purchased during the evaluation period, business loans accounted 79.89 percent, consumer loans accounted for 16.75 percent, and home mortgage accounted for 3.36 percent.

To evaluate the bank's performance during the evaluation period, examiners relied on internal bank reports for business, consumer, and home mortgage loans. For the lending analysis, the OCC transaction tested loans for each primary product during the evaluation period as part of a data integrity examination to confirm the accuracy and reliability of the data in the internal bank reports. Bank controls were deemed sufficient to allow for the reliance on the data in the reports (business revenues, borrower income figures, and census tracts/location). The OCC noted no substantive deficiencies with the data. Therefore, the OCC used all business (small loans to businesses), consumer, and home mortgage loans originated or purchased in the AAs for the lending analysis. Additionally, examiners used 2023 Home Mortgage Disclosure Act (HMDA) data for the analysis. The analysis included a review of each primary product when sufficient volume (at least 20 loans) was present in an AA during the evaluation period of 2021, 2022, and 2023.

During the evaluation period, the top four states for small business loan originations and purchases were Texas (264 loans), Florida (212 loans), California (132 loans), and Ohio (114 loans). Management provided internal bank reports exhibiting the loan volume per state. However, United Midwest did not originate or purchase enough loans inside the AAs for a meaningful analysis during this review.

This evaluation period included two census periods. In evaluating the geographic distribution and borrower income distribution under the Lending Test for the home mortgage loan analysis, examiners compared the bank's 2021 lending performance to the demographic data from the 2010 U.S. Census referenced in the tables in Appendix D, which is derived from the 2015 American Community Survey (ACS), and 2021 HMDA Aggregate Data. Examiners compared the 2022 and 2023 home mortgage lending performance to the 2020 U.S. Census and 2022 and 2023 HMDA Aggregate Data.

For the distribution of small loans to businesses, examiners compared the bank's 2021 performance to the 2010 U.S. Census (derived from the 2015 ACS), 2021 Dunn & Bradstreet Small Business Small Farm (SBSF) demographics, and 2021 CRA Aggregate Data. For loans originated or purchased in 2022 and 2023, examiners compared the bank's performance to the 2020 U.S. Census, 2022 and 2023 Dunn & Bradstreet SBSF demographics, and 2022 and 2023 CRA Aggregate Data.

For the distribution of consumer loans, examiners compared the bank's 2021 performance to the 2010 U.S. Census (derived from the 2015 ACS) and 2022 and 2023 performance to the 2020 U.S. Census demographics.

No affiliate activity was included in this analysis. Refer to the table in appendix A, Scope of the Examination, for more information on the scope of the review.

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

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

During the evaluation period, United Midwest had two AAs in Ohio, as described in the "Description of Institution's Operations in Ohio" section of this evaluation. Examiners completed a full-scope review of each AA, the Columbus MSA and OH Non-MSA.

### **Ratings**

The bank's overall rating is based on the state of Ohio rating. The state rating in rating areas with multiple AAs are based on the weighted-average conclusions in those AAs. During the evaluation period, United Midwest operated all branch offices in a single state. Therefore, its overall rating is based on performance solely in Ohio. The state of Ohio rating is based on performance in both AAs. Refer to the "Scope" section under each state section for details regarding how the areas were weighted in arriving at the respective ratings.

The Columbus MSA represented the bank's largest market with the most deposits and lending activity. By number of home mortgage loans originated or purchased inside the AAs during the evaluation period, 46.90 percent were in the Columbus MSA and 53.10 percent were in the OH Non-MSA. By number of small loans to businesses (business loans) that were originated or purchased inside the AAs during the evaluation period, 83.87 percent were in the Columbus MSA and 16.13 percent were in the OH Non-MSA. By number of consumer loans originated or purchased inside the AAs during the evaluation period, 85.28 percent were in the Columbus MSA and 14.72 percent were in the OH Non-MSA. In total, the bank originated or purchased 71.50 percent of home mortgage, business, and consumer loans inside the Columbus MSA, with 28.50 percent inside the OH Non-MSA. The Columbus MSA held 66.7 percent of total deposits as of June 30, 2023, and 60 percent of total branches as of December 31, 2023. The bank's main office is headquartered in the OH Non-MSA, with the bank's corporate office and holding company headquartered in the Columbus MSA. Unless otherwise noted,

examiners placed more weight on the Columbus MSA and performance in 2022 – 2023 as it represented the largest portion of the evaluation period.

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

Pursuant to 12 CFR 25.28(c) (March 29, 2024) in determining a national banks or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

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

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

## State Rating

### State of Ohio

**CRA rating for the State of Ohio:** Satisfactory.

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

**The Community Development Test is rated:** Outstanding.

The major factors that support this rating include:

- The bank's geographic distribution of loans reflects an overall reasonable distribution among geographies of different income levels.
- United Midwest exhibits an overall reasonable distribution of loans to individuals of different income levels.
- United Midwest has not received any complaints about its CRA performance in helping to meet the AAs' credit needs during the evaluation period.
- United Midwest demonstrates excellent responsiveness to CD needs through a combination of CD loans, qualified investments, and CD services, specifically in the Columbus MSA.
- Additionally, the bank's LTD ratio during the evaluation period is more than reasonable and provides additional support for overall satisfactory performance.

### Description of Institution's Operations in Ohio

United Midwest designated two AAs in the state of Ohio. As of the 2020 U.S. Census, the Columbus MSA included 328 CTs, which included all of Franklin County, Ohio. The OH Non-MSA included 47 CTs, which included Champaign, Darke, Logan, and Preble Counties. Bank management selected the AAs based on its targeted lending area, deposits, and branch locations. The bank is headquartered in Logan County in the OH Non-MSA. However, a majority of the lending and deposit activity was in the Columbus MSA during the evaluation period.

The bank offers traditional banking products with a focus on home mortgage lending within the AAs, but also offers consumer and business loans nationwide, as discussed above. Deposit operations function in a traditional manner with most deposits obtained by bank personnel located in physical offices. Deposit market shares in the AAs were low, but the AAs were adequately served by other financial institutions as well. Competition from large banks in the Columbus MSA is substantial.

### Columbus MSA

The following information regarding demographic data, affordable housing cost, job market and economic conditions, competition, and community contacts/credit needs provides additional performance context for the bank's operations in the Columbus MSA. The tables below provide a summary of demographic data for the AA.

Assessment Area - Columbus MSA 2021						
2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	284	21.48	26.76	24.30	26.41	1.06
Population by Geography	1,215,761	14.74	26.20	26.64	31.35	1.07
Housing Units by Geography	536,811	16.40	26.69	26.59	30.01	0.31
Owner-Occupied Housing by Geography	258,868	7.69	22.63	29.33	40.34	0.01
Occupied Rental Units by Geography	222,078	21.76	30.73	25.51	21.45	0.55
Vacant Units by Geography	55,865	35.42	29.40	18.27	16.19	0.72
Businesses by Geography	59,183	12.14	20.92	25.36	41.01	0.57
Farms by Geography	1,329	10.08	22.50	29.04	38.00	0.38
Family Distribution by Income Level	279,594	24.85	17.53	18.99	38.63	0.00
Household Distribution by Income Level	480,946	26.19	17.08	17.55	39.18	0.00
Unemployment rate (%)	7.00	14.09	9.02	5.60	3.77	16.16
Households Below Poverty Level (%)	15.41	36.78	19.36	10.60	6.31	66.48
Median Family Income (18140 - Columbus, OH MSA)	\$70,454			Median Housing Value	\$127,850	
Median Family Income (18140 - Columbus, OH MSA) for 2021	\$83,900			Median Gross Rent	\$844	
				Families Below Poverty Level	12.81	

FFIEC File - 2010 Census  
2021 Dun & Bradstreet SBSF Demographics  
Due to rounding, totals may not equal 100.0%  
(\*) The NA category consists of geographies that have not been assigned an income classification

Assessment Area - Columbus MSA 2023						
2022 - 2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	328	17.38	24.09	29.88	26.22	2.44
Population by Geography	1,323,807	13.17	22.57	33.35	28.89	2.01
Housing Units by Geography	559,478	13.85	22.98	33.67	28.12	1.38
Owner-Occupied Housing by Geography	278,490	7.13	18.36	37.20	36.91	0.40
Occupied Rental Units by Geography	240,747	19.00	27.96	31.22	19.68	2.14
Vacant Units by Geography	40,241	29.50	25.12	23.93	17.78	3.67
Businesses by Geography	67,250	11.78	19.71	32.08	34.78	1.65
Farms by Geography	1,519	10.86	20.54	34.56	32.92	1.12
Family Distribution by Income Level	301,991	24.68	17.90	20.28	37.14	0.00
Household Distribution by Income Level	519,237	25.37	17.40	18.58	38.65	0.00
Unemployment rate (%)	4.84	10.03	6.31	4.05	2.49	8.75
Households Below Poverty Level (%)	13.13	32.17	18.04	8.79	4.93	41.07
Median Family Income (18140 - Columbus, OH MSA)	\$84,088			Median Housing Value	\$163,200	
Median Family Income (18140 - Columbus, OH MSA) for 2023	\$100,900			Median Gross Rent	\$979	
				Families Below Poverty Level	10.82	

FFIEC File - 2020 Census  
2023 Dun & Bradstreet SBSF Demographics  
Due to rounding, totals may not equal 100.0%  
(\*) The NA category consists of geographies that have not been assigned an income classification

### Demographic Data

As of the 2020 U.S. Census data in the table above, the population in the Columbus MSA was 1,323,807, with 13.17 percent of the population living in low-income CTs, 22.57 percent in moderate-income CTs, 33.35 percent in middle-income CTs, 28.89 percent in upper-income CTs, and 2.01 percent in CTs that have not been assigned an income classification. The AA consisted of 328 CTs, and was comprised of 57 low-income CTs, 79 moderate-income CTs, 98 middle-income CTs, 86 upper-income CTs, and eight CTs that have not been assigned an income classification. The AA included 301,991 families and 519,237 households.

The major changes from the 2010 U.S. Census referenced above for 2021 (which is derived from the 2015 ACS data) to the 2020 U.S. Census included an increase in number of CTs from 284 to 328 and percentage decreases in the low- and moderate-income CTs. Additionally, the population increased by approximately 8.89 percent.

#### Affordable Housing Cost

Assuming a 30-year mortgage with a 5 percent interest rate, and not accounting for down payment, homeowners' insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$50,450 per year (or less than 50 percent of the 2023 Federal Financial Institutions Examination Council (FFIEC) adjusted median family income in the AA) could afford a \$234,948 mortgage with a payment of \$1,261 per month. A moderate-income borrower making \$80,720 per year (or less than 80 percent of the 2023 FFIEC adjusted median family income in the AA) could afford a \$375,916 mortgage with a payment of \$2,018 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$1,932 based on list price of housing. The median housing value in the AA was \$299,900 at the beginning of the evaluation period and \$359,900 at the end of the evaluation period, reflecting a 20.01 percent change from 2021 to 2023 according to Realtor.com data.

Examiners considered the poverty level across the AA in the evaluation of lending performance. Families and households living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial capacity to qualify for a home mortgage or consumer loan than those with income above the poverty level. For the Columbus MSA, the percentage of families below poverty level was 10.82 percent as noted in the above 2023 table. The percentage of households below poverty was 13.13 percent. Additionally, the median household income for the selected geography of Franklin County in the Columbus MSA was \$60,298 for 2023.

Housing availability in the AA posed challenges to lending in low- and moderate-income geographies. As of the 2020 U.S. Census, total occupied rental units in the AA were 43.03 percent (46.96 percent in low- and moderate-income CTs) of available units. An additional barrier to available units was the volume of vacant units of 7.19 percent (54.62 percent in low- and moderate-income CTs) of total housing units. Owner-occupied units in the AA accounted for 49.78 percent of total housing units, with 7.13 percent in low-income CTs and 18.36 percent in moderate-income CTs.

#### Job Market and Economic Conditions

Economic conditions in the Columbus MSA were stable. According to the U.S. Bureau of Labor Statistics, the average annual unemployment rate for Franklin County gradually declined from 2021 to 2023. Comparatively, the average annual unemployment rate for Franklin County was lower than the state of Ohio and national unemployment rates. The following table summarizes the unemployment rates.

Average Annual Unemployment Rates			
	2021	2023	2023
State of Ohio	5.3	4.0	3.7
United States	5.4	3.7	3.6
Franklin County	5.1	3.4	3.3

*Source: U.S. Bureau of Labor Statistics; Rates Not Seasonally Adjusted.*

The AA had a diverse mix of companies across many industries with a significant presence of professional and business services, education and health services, and government. Large employers in the Columbus MSA included The Ohio State University, OhioHealth, JPMorgan Chase & Co., Nationwide Children's Hospital Inc., and Kroger Co. According to the Moody's Analytics Report dated June 2025, Columbus' economy is back on track and the labor market is rebounding.

### Competition

Competition for deposits in the Columbus MSA was strong with 34 total Federal Deposit Insurance Corporation (FDIC) insured financial institutions operating 290 offices in Franklin County. According to the FDIC's Deposit Market Share Report as of June 30, 2023, United Midwest had \$265.3 million in deposits in Franklin County, which comprised 66.7 percent of total bank deposits. The bank had a deposit market share of 0.30 percent and was ranked 16<sup>th</sup> out of 34 financial institutions. The top competitors in the AA were Huntington National Bank with 44 branches and 44.69 percent market share, JPMorgan Chase Bank, N.A. with 41 branches and 25.54 percent market share, and PNC Bank, N.A. with 28 branches and 6.64 percent market share.

One of the bank's primary business products in the Columbus MSA was home mortgage lending. There was strong competition for home mortgage loans during the evaluation period. Based on 2023 Peer Mortgage Data and 2020 U.S. Census data, the bank ranked 129<sup>th</sup> out of 512 lenders in the Columbus MSA in residential home mortgage application volume. As of the 2023 Peer Mortgage Data Report, United Midwest had 0.08 percent of the lending market share, based on the number of mortgage applications at 24, with application volume of approximately \$5.4 million. Based on 2023 Peer Mortgage Data, top mortgage lenders in the Columbus MSA included Huntington National Bank with 9.04 percent market share, NFM, Inc. with 3.77 percent market share, and Rocket Mortgage with 3.60 percent market share. During the evaluation period, 46.90 percent of the bank's home mortgage loan originations and purchases inside the AAs were in the Columbus MSA.

### Community Contacts/Credit Needs

The OCC reviewed information provided from interviews with community contacts that were conducted during the evaluation period to understand the Columbus MSA's needs and opportunities. The contacts included affordable housing organizations and small business lending organizations.

The OCC considered information from an interagency listening session with representatives from several community organizations in the Columbus MSA area. The participants discussed demographic trends, affordable housing, and workforce development. One participant stated central Ohio is the fastest growing area in the state and Franklin County is the most populous. It was also noted that affordable housing has always been a social issue but is becoming an economic development issue as well. In Columbus, many households spend at least 50 percent of income on housing and thousands of low-income families are on waiting lists for public housing

and Section 8 voucher programs. The participants mentioned other affordable housing issues including low-income homeownership sustainability.

The OCC also reviewed information from an interview with a representative of a community organization that provides affordable housing. The representative mentioned affordable housing as a primary need of their clients. The representative further stated that the supply of affordable housing for sale is very limited and when they are available potential buyers are being “outbid” by local investors. The representative stated that their organization provides a down payment participation program and that they have relationships with financial institutions to help promote and fund this program.

The OCC reviewed information from an interview with a representative of an affordable housing organization. This contact noted that affordable housing and financial literacy are needed in the Columbus area.

The OCC reviewed information from interviews regarding small business lending, including SBA loans. These were conducted in 2024, and one representative mentioned that the economic conditions in the Columbus area have returned to stronger levels since the COVID-19 pandemic. The representative stated that the Columbus area continues to experience population growth due to expansion of several existing businesses and consistent employment opportunities. One contact stated that with more residents moving into the area, there is a higher cost pressure to existing residents with rising levels of rents and home values. This contact stated that the area needs more affordable housing options and financial literacy. The contact also noted that some groups tend to use high-interest credit card products for their small business financing needs, instead of using more affordable lending products offered at national, regional, and local financial institutions. This contact confirmed the highly competitive market for small business lending within the Columbus area and stated that one of the largest SBA 7(a) lenders in the entire United States is headquartered in Columbus, Ohio. One contact stated that small business and home mortgage lending are the area’s greatest credit needs.

#### OH Non-MSA

The following information regarding demographic data, affordable housing cost, job market and economic conditions, competition, and community contacts/credit needs provides additional performance context for the bank’s operations in the OH Non-MSA. The tables below provide a summary of demographic data for the AA.

Assessment Area - OH Non-MSA 2021										
2021										
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #				
Geographies (Census Tracts)	45	0.00	15.56	64.44	20.00	0.00				
Population by Geography	178,915	0.00	14.65	65.47	19.88	0.00				
Housing Units by Geography	80,451	0.00	16.16	65.89	17.95	0.00				
Owner-Occupied Housing by Geography	52,348	0.00	11.25	66.82	21.93	0.00				
Occupied Rental Units by Geography	18,518	0.00	27.51	61.62	10.87	0.00				
Vacant Units by Geography	9,585	0.00	21.05	69.08	9.87	0.00				
Businesses by Geography	4,830	0.00	19.34	62.40	18.26	0.00				
Farms by Geography	854	0.00	3.75	74.94	21.31	0.00				
Family Distribution by Income Level	49,125	18.86	17.08	22.96	41.10	0.00				
Household Distribution by Income Level	70,866	20.61	16.51	18.74	44.13	0.00				
Unemployment rate (%)	7.86	0.00	12.15	7.68	5.70	0.00				
Households Below Poverty Level (%)	12.08	0.00	20.67	11.70	6.40	0.00				
Median Family Income (Non-MSAs - OH)	\$55,785		Median Housing Value		\$118,600					
Median Family Income (Non-MSAs - OH) for 2021	\$64,700		Median Gross Rent		\$677					
			Families Below Poverty Level		9.69					
FFIEC File - 2010 Census										
2021 Dun & Bradstreet SBSF Demographics										
Due to rounding, totals may not equal 100.0%										
(*) The NA category consists of geographies that have not been assigned an income classification										

Assessment Area - OH Non-MSA 2023										
2022 - 2023										
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #				
Geographies (Census Tracts)	47	2.13	4.26	68.09	25.53	0.00				
Population by Geography	177,744	2.09	4.12	64.91	28.87	0.00				
Housing Units by Geography	81,178	2.25	5.02	65.31	27.43	0.00				
Owner-Occupied Housing by Geography	53,203	1.21	2.84	63.93	32.02	0.00				
Occupied Rental Units by Geography	18,396	5.20	8.05	67.76	18.99	0.00				
Vacant Units by Geography	9,579	2.33	11.32	68.25	18.10	0.00				
Businesses by Geography	5,177	3.38	3.77	67.80	25.05	0.00				
Farms by Geography	756	0.53	0.66	66.27	32.54	0.00				
Family Distribution by Income Level	48,943	15.48	17.90	23.12	43.50	0.00				
Household Distribution by Income Level	71,599	19.15	15.80	19.25	45.80	0.00				
Unemployment rate (%)	3.97	5.42	4.90	3.99	3.72	0.00				
Households Below Poverty Level (%)	10.86	27.13	23.23	10.91	7.69	0.00				
Median Family Income (Non-MSAs - OH)	\$66,684		Median Housing Value		\$134,000					
Median Family Income (Non-MSAs - OH) for 2023	\$79,500		Median Gross Rent		\$735					
			Families Below Poverty Level		7.76					
FFIEC File - 2020 Census										
2023 Dun & Bradstreet SBSF Demographics										
Due to rounding, totals may not equal 100.0%										
(*) The NA category consists of geographies that have not been assigned an income classification										

### Demographic Data

As of the 2020 U.S. Census data in the table above, the population in the OH Non-MSA was 177,744, with 2.09 percent of the population living in low-income CTs, 4.12 percent in moderate-income CTs, 64.91 percent in middle-income CTs, and 28.87 percent in upper-income CTs. The AA consisted of 47 CTs, and was comprised of one low-income CT, two moderate-income CTs, 32 middle-income CTs, and 12 upper-income CTs. The AA included 48,943 families and 71,599 households.

The major changes from the 2010 U.S. Census (which is derived from the 2015 ACS data) to the 2020 U.S. Census included changes to the number of low- and moderate-income CTs and a slight decrease in population of 0.65 percent.

#### Affordable Housing Cost

Assuming a 30-year mortgage with a 5 percent interest rate, and not accounting for down payment, homeowners' insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$39,750 per year (or less than 50 percent of the 2023 FFIEC adjusted median family income in the AA) could afford a \$185,117 mortgage with a payment of \$994 per month. A moderate-income borrower making \$63,600 per year (or less than 80 percent of the 2023 FFIEC adjusted median family income in the AA) could afford a \$296,188 mortgage with a payment of \$1,590 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$1,283 based on the average list price of housing for each county in the AA. The combined average median housing value for each county in the AA was \$160,338 at the beginning of the evaluation period and \$238,931 at the end of the evaluation period, reflecting a change of 49.02 percent from 2021 to 2023 according to Realtor.com data.

Examiners considered the poverty level across the AA in the evaluation of lending performance. Families and households living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial capacity to qualify for a home mortgage or consumer loan than those with income above the poverty level. For the OH Non-MSA, the percentage of families below poverty level was 7.76 percent as noted in the above 2023 table. The percentage of households below poverty was 10.86 percent. Additionally, the median household income for the selected geography of the OH Non-MSA was \$59,943 for 2023.

Housing availability in the AA posed challenges to lending in low- and moderate-income geographies. As of the 2020 U.S. Census, total occupied rental units in the AA were 22.66 percent (13.25 percent in low- and moderate-income CTs) of available units. An additional barrier to available units was the volume of vacant units of 11.80 percent (13.65 percent in low- and moderate-income CTs) of total housing units. Owner-occupied units in the AA accounted for 65.54 percent of total housing units, with only 1.21 percent in low-income CTs and 2.84 percent in moderate-income CTs.

#### Job Market and Economic Conditions

Economic conditions in the OH Non-MSA were stable. According to the U.S. Bureau of Labor Statistics, the average annual unemployment rates for each county gradually declined from 2021 to 2023. Comparatively, the average annual unemployment rate for each county was commensurate with or lower than the state of Ohio and national unemployment rates. The following table summarizes the unemployment rates.

Average Annual Unemployment Rates			
	2021	2023	2023
State of Ohio	5.3	4.0	3.7
United States	5.4	3.7	3.6
Champaign County	4.8	3.9	3.5
Darke County	4.1	3.6	3.3
Logan County	4.4	3.5	3.2
Preble County	4.3	3.5	3.3

*Source: U.S. Bureau of Labor Statistics; Rates Not Seasonally Adjusted.*

The AA had a diverse mix of companies across many industries with a significant presence of manufacturing, trade, and transportation. Large employers in the OH Non-MSA included Honda Motor Co. LTD, Wal-Mart Stores, Inc., Cargill/Provimi North America, Henny Penny Corp., Honeywell International Inc., Bundy Baking Solutions, FRAM Group Operations LLC, and Dick Lavy Trucking.

### Competition

Competition for deposits in the OH Non-MSA was strong with 29 total FDIC insured financial institutions operating 71 offices in Champaign, Darke, Logan, and Preble Counties. According to the FDIC's Deposit Market Share Report as of June 30, 2023, United Midwest had \$132.3 million in deposits in the OH Non-MSA, which comprised 33.3 percent of total bank deposits. The bank had a deposit market share of 3.38 percent and was ranked 13<sup>th</sup> out of 29 financial institutions. The top competitors in the AA were Park National Bank with eight branches and 13.68 percent market share, Greenville National Bank with seven branches and 10.95 percent market share, and The Farmers & Merchants State Bank with one branch and 5.74 percent market share.

One of the bank's primary business products in the OH Non-MSA was home mortgage lending. There was strong competition for home mortgage loans during the evaluation period. Based on 2023 Peer Mortgage Data and 2020 U.S. Census data, the bank ranked 34<sup>th</sup> out of 261 lenders in the OH Non-MSA in residential home mortgage application volume. As of the 2023 Peer Mortgage Data Report, United Midwest had 0.76 percent of the lending market share, based on the number of mortgage applications at 28, with application volume of approximately \$5.4 million. Based on 2023 Peer Mortgage Data, top mortgage lenders in the OH Non-MSA included Huntington National Bank with 6.17 percent market share, Wright Patt Credit Union Inc. with 4.83 percent market share, and Rocket Mortgage with 4.78 percent market share. During the evaluation period, 53.10 percent of the bank's home mortgage loan originations and purchases inside the AAs were in the OH Non-MSA.

### Community Contacts/Credit Needs

The OCC reviewed information provided from interviews with community contacts that were conducted during the evaluation period to understand the OH Non-MSA's needs and opportunities. The contacts included affordable housing and economic development organizations. One contact noted that affordable housing and financial literacy are needs in the community.

One representative of an economic development organization noted that Logan County was seeing slower growth than the Columbus MSA; however, the local economy was strong with many open positions available at local businesses. The contact stated that Honda of America Manufacturing is a primary employer in the area. This contact stated that affordable housing is a credit need in the county

for both single family and multifamily homes. The contact also stated that financing for multifamily properties and start-up businesses are needs in the community.

Another representative of an economic development organization noted that “workforce” affordable housing at market rates was a need in the community. This contact stated there was a need for more housing at affordable market rates that would be affordable to most in the area. The contact also stated that small business lending was a credit need in the community.

## **Scope of Evaluation in Ohio**

Examiners performed a full-scope review of both AAs, the Columbus MSA and OH Non-MSA. The data in the AAs was analyzed and presented as two AAs for the purposes of this evaluation. Home mortgage, consumer, and small business (small loans to businesses) lending were the bank’s primary lending products during the evaluation period. As noted in the community contacts, affordable housing is a primary need in the AAs. With affordable housing as a primary need in the AAs, the bank focused their home mortgage lending product to meet the needs of low- and moderate-income residents in the AAs. As discussed above, the bank developed a product, MyPlace, that benefits low- and moderate-income borrowers. Home mortgage lending is a primary product within the bank’s AAs, and the bank does not originate home mortgage loans outside the AAs. Therefore, the OCC gave additional consideration to home mortgage lending as the product was developed to meet the specific needs of the AAs. Although the overall volume of home mortgage loan originations is significantly lower than small business and consumer lending, the OCC considered home mortgage lending as a primary product that addresses the needs within the community as stated by the community contacts.

The Columbus MSA represented the largest concentration of deposit and lending activity. Unless otherwise noted, examiners placed more weight on the Columbus MSA and performance in 2022 – 2023 as it represented the largest portion of the evaluation period. Examiners used 2021, 2022, and 2023 loan data for the lending analysis, as discussed above. Refer to the Scope of Evaluation section above for more details.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO**

### **LENDING TEST**

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

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

Based on full-scope reviews, the bank’s lending performance in the state of Ohio is reasonable.

As discussed above, home mortgage lending is a primary product in the AAs and not offered on a nationwide basis. With affordable housing as a primary need in the AAs, the bank focused their home mortgage lending product to meet the needs of low- and moderate-income residents in the AAs and the OCC considered this during the review. During the evaluation period, there was an insufficient number of small loans to businesses in both AAs for a meaningful analysis.

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

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

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

Refer to Table 7 in the state of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

#### Columbus MSA

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

##### *2021*

Although the volume of home mortgage loan originations in the Columbus MSA in 2021 was not sufficient for a meaningful analysis, the data in Table 7 reflects consistent performance with the 2022 – 2023 analysis.

##### *2022 – 2023*

The percentage of home mortgage loans in low-income geographies exceeded both the percentage of owner-occupied (OO) housing units located in those geographies and the aggregate percentage of all reporting lenders (HMDA aggregate data). The percentage of home mortgage loans in moderate-income geographies exceeded both the percentage of OO housing units located in those geographies and the aggregate percentage of all reporting lenders.

#### OH Non-MSA

The geographic distribution of home mortgage loans in the OH Non-MSA was excellent.

##### *2021*

The percentage of home mortgage loans in moderate-income geographies exceeded both the percentage of OO housing units located in those geographies and the aggregate percentage of all reporting lenders. There were no low-income geographies in the OH Non-MSA in 2021.

##### *2022 – 2023*

The percentage of home mortgage loans in low-income geographies exceeded both the percentage of OO housing units located in those geographies and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans in moderate-income geographies exceeded both the percentage of OO housing units located in those geographies and the aggregate percentage of all reporting lenders.

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

Refer to Table 9 in the state of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

### Columbus MSA

United Midwest did not originate enough small loans to businesses to perform a meaningful analysis in the Columbus MSA during either analysis period.

### OH Non-MSA

United Midwest did not originate enough small loans to businesses to perform a meaningful analysis in the OH Non-MSA during either analysis period.

### ***Consumer Loans***

Refer to Table 13 in the state of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The bank exhibited a reasonable geographic distribution of consumer loans, given the bank's non-traditional business model, significant performance context considerations, and review of each AA during each analysis period. Performance within the Columbus MSA for 2021 was overall reasonable and consistent with the previous CRA evaluation, while performance in 2022 – 2023 was significantly below the percentage of households located in low- and moderate-income geographies. Performance in the OH Non-MSA was reasonable. The OCC noted that most consumer loans are obtained through third-party sources who have relationships with the product or service provider. Consequently, the bank's ability to effectively target a market based on geography considerations is more limited than for a traditional bank. This same approach was used at the previous CRA performance evaluation.

### Columbus MSA

Given United Midwest's non-traditional business model and significant performance context considerations, the geographic distribution of consumer loans in the Columbus MSA was overall reasonable. The majority of the consumer loans were to finance small dollar loans to purchase pianos, musical instruments, elective health procedures, and other consumer goods. The OCC considered the nature of the consumer loan products limiting demand as well. Additionally, as stated above, the bank's ability to effectively target a market based on geography considerations is more limited with the non-traditional model than it is for a traditional bank. Additionally, the level of households below poverty was significant in the low- and moderate-income geographies. A higher poverty rate based on household income may have contributed to lower lending levels in low- and moderate-income geographies, as well as the bank's highly specialized niche within the consumer loan market.

### *2021*

The percentage of consumer loans originated or purchased by the bank in low-income geographies was well below the percentage of households located in those geographies. The percentage of consumer loans originated or purchased by the bank in moderate-income geographies was below the percentage of households located in those geographies. The bank originated or purchased four loans to borrowers in low-income geographies and nine loans to borrowers in moderate-income geographies during the evaluation period in the Columbus MSA. As noted in Table 13, there were more lending opportunities in moderate-income geographies, and examiners gave more weight to moderate-income. The bank's

overall performance in lending in low- and moderate-income geographies improved since the previous CRA evaluation and is overall reasonable given the performance context discussed below.

The OCC considered other factors in the bank's performance during the review, including that 15.41 percent of the households in the Columbus MSA live below poverty, with 36.78 percent below poverty in low-income geographies and 19.36 percent below poverty in moderate-income geographies. The OCC also noted that 17 percent (208,422) of the population in the Columbus MSA live below poverty. A higher poverty rate based on household income may have contributed to lower lending levels in low- and moderate-income geographies, as well as the bank's highly specialized niche within the consumer loan market.

#### 2022 – 2023

The percentage of consumer loans originated or purchased by the bank in low-income geographies was significantly below the percentage of households located in those geographies. The percentage of consumer loans originated or purchased by the bank in moderate-income geographies was significantly below the percentage of households located in those geographies. The bank originated or purchased five loans to borrowers in low-income geographies and 16 loans to borrowers in moderate-income geographies during the evaluation period in the Columbus MSA. The bank's overall performance in lending in low- and moderate-income geographies was overall reasonable based on performance context discussed below.

The OCC considered other factors in the bank's performance during the review, including that 13.13 percent of the households in the Columbus MSA live below poverty, with 32.17 percent below poverty in low-income geographies and 18.04 percent below poverty in moderate-income geographies. The OCC also noted that 15 percent (192,431) of the population in the Columbus MSA live below poverty. A higher poverty rate based on household income may have contributed to lower lending levels in low- and moderate-income geographies, as well as the bank's highly specialized niche within the consumer loan market.

#### OH Non-MSA

The geographic distribution of consumer loans in the OH Non-MSA was reasonable.

#### 2021

United Midwest did not originate enough consumer loans to perform a meaningful analysis in the OH Non-MSA in 2021.

#### 2022 – 2023

The percentage of consumer loans originated or purchased by the bank in low-income geographies was below the percentage of households located in those geographies as the bank did not originate any consumer loans in low-income geographies. However, there was only one low-income geography in the OH Non-MSA. The assessment of performance in low-income geographies considered the limited number of households in low-income geographies. Demographic data (percentage of households) reflected minimal (2.23 percent) lending opportunities in low-income geographies. The percentage of consumer loans originated or purchased by the bank in moderate-income geographies exceeded the

percentage of households located in those geographies. The OCC placed more weight on lending in moderate-income geographies as there were more lending opportunities.

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

The OCC reviewed summary reports and maps and analyzed the bank's home mortgage, business (small loans to businesses), and consumer 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 in the bank's AAs, given performance context considerations.

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

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank and the bank's non-traditional business model.

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

Refer to Table 8 in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

##### Columbus MSA

The distribution of home mortgage loans among individuals of different income levels in the Columbus MSA was excellent.

##### **2021**

United Midwest did not originate enough home mortgage loans to perform a meaningful analysis in the Columbus MSA in 2021.

##### **2022 – 2023**

The percentage of home mortgage loans to low-income borrowers was well below the percentage of families and exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of families and the aggregate percentage of all reporting lenders.

This assessment of performance also considered the affordability of homeownership for low-income borrowers in the AA relative to the median housing value. As previously discussed, based on the 2023 FFIEC adjusted median family income, low-income borrowers earning no more than \$50,450 per year would find it challenging to qualify for a mortgage given the AA's reported median housing values of \$299,900 at the beginning of the evaluation period and \$359,900 at the end of the evaluation period, according to Realtor.com data. The OCC also noted that approximately 10.82 percent of the families in the AA were below the poverty level and the median gross rent was \$979 per month.

## OH Non-MSA

The distribution of home mortgage loans among individuals of different income levels in the OH Non-MSA was excellent.

### *2021*

The percentage of home mortgage loans to low-income borrowers exceeded both the percentage of families and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of families and the aggregate percentage of all reporting lenders.

### *2022 – 2023*

The percentage of home mortgage loans to low-income borrowers was well below the percentage of families and near to the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of families and the aggregate percentage of all reporting lenders.

This assessment of performance also considered the affordability of homeownership for low-income borrowers in the AA relative to the median housing value. As previously discussed, based on the 2023 FFIEC adjusted median family income, low-income borrowers earning no more than \$39,750 per year would find it challenging to qualify for a mortgage given the AA's reported average median housing values for each county in the OH Non-MSA of \$160,338 at the beginning of the evaluation period and \$238,931 at the end of the evaluation period, according to Realtor.com data. Examiners also noted that approximately 7.76 percent of the families in the AA were below the poverty level and the median gross rent was \$735 per month.

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

Refer to Table 10 in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

United Midwest did not originate enough small loans to businesses to perform a meaningful analysis in the Columbus MSA or the OH Non-MSA during either analysis period. However, for the loans that were originated or purchased, the bank's percentage of small loans to businesses with revenues of \$1 million or less exceeded the aggregate percentage of all reporting lenders for both AAs and was below the percentage of businesses with revenues of \$1 million or less, demonstrating reasonable performance.

During the evaluation period, the top four states for small business loan originations and purchases were Texas (264 loans), Florida (212 loans), California (132 loans), and Ohio (114 loans). According to management, many of the bank's SBA loans originated or purchased during the evaluation period were for small or start-up businesses with less than \$1 million in historical annual revenues.

## Columbus MSA

United Midwest did not originate enough small loans to businesses to perform a meaningful analysis in the Columbus MSA during either analysis period.

## OH Non-MSA

United Midwest did not originate enough small loans to businesses to perform a meaningful analysis in the OH Non-MSA during either analysis period.

### ***Consumer Loans***

Refer to Table 14 in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

## Columbus MSA

The distribution of consumer loans among individuals of different income levels in the Columbus MSA was poor.

As discussed above, the OCC noted that most consumer loans are obtained through third-party sources who have relationships with the product or service provider. Consequently, the bank's ability to effectively target a market is more limited than a traditional bank. The OCC considered other factors in the bank's performance during the review, including the percentages of households below poverty. Limited income is a substantial obstacle to credit qualification and the bank's primary consumer lending products are for excess goods such as pianos, musical instruments, safes, and elective health procedures. The bank's business model and the nature of the products limiting demand among low- and moderate-income consumers were considered; however, these were not sufficient to describe the distribution as reasonable.

### ***2021***

The percentage of consumer loans to low-income borrowers was significantly below the percentage of households as the bank did not originate any consumer loans in low-income geographies. The percentage of consumer loans to moderate-income borrowers was well below the percentage households.

### ***2022 – 2023***

The percentage of consumer loans to low-income borrowers was significantly below the percentage of households. The percentage of consumer loans to moderate-income borrowers was significantly below the percentage households.

## OH Non-MSA

The distribution of consumer loans among individuals of different income levels in the OH Non-MSA was reasonable.

### ***2021***

United Midwest did not originate enough consumer loans to perform a meaningful analysis in the OH Non-MSA in 2021.

2022 – 2023

The percentage of consumer loans to low-income borrowers was below the percentage of households. The percentage of consumer loans to moderate-income borrowers exceeded the percentage households. Examiners considered performance context factors including the nature of the products limiting demand among low-income consumers and that 10.86 percent of the households in the OH Non-MSA live below poverty.

### **Responses to Complaints**

The bank has not received any complaints about its CRA performance in helping to meet the AAs' credit needs during the evaluation period.

## **COMMUNITY DEVELOPMENT TEST**

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

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

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

United Midwest met the threshold of an intermediate small bank for CRA purposes beginning as of January 1, 2022. As of January 1, 2021, to December 31, 2021, the bank was a small bank for CRA purposes. As such, the bank was not subject to the CD requirements for intermediate small banks in 2021. However, the bank opted to provide 2021 CD loan, investment, and service activities during this evaluation.

Beginning in early 2020, the global economy was adversely affected by the COVID-19 pandemic, which spread worldwide and caused deteriorating economic conditions resulting from stay-at-home orders and businesses shutting down to lessen the spread and impact of the virus. United Midwest responded to customers facing financial hardship during the pandemic by participating in the SBA's PPP, which provided small and mid-sized businesses impacted by the pandemic with funds to cover payroll costs and other expenses. In total, the bank originated 186 SBA PPP loans totaling \$16.5 million in critical funding to businesses, with 55 PPP loans totaling \$8.3 million in Ohio. Within the bank's AAs, the bank originated 21 SBA PPP loans totaling \$3.4 million. These loans were accounted for under the Lending Test, except for one SBA PPP loan with an original loan amount over \$1 million which was accounted for under the CD Test for the Columbus MSA.

### **Number and Amount of Community Development Loans**

United Midwest's CD lending demonstrates excellent responsiveness to CD needs, based on excellent responsiveness to CD needs in the Columbus MSA. During the evaluation period, United Midwest originated a total of five qualified CD loans totaling \$2.8 million or 4.78 percent of total tier 1 capital as of December 31, 2023. These loans were responsive to CD needs for affordable housing in the bank's AAs and supporting area businesses during the COVID-19 pandemic. Four loans were originated to an

affordable housing organization that provided housing to low- and moderate-income individuals within the AAs.

The CD Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

<b>Table 3: Community Development Loans</b>				
<b>Assessment Area</b>	<b>Total</b>			
	<b>#</b>	<b>% of Total #</b>	<b>\$(000's)</b>	<b>% of Total \$</b>
Columbus MSA	4	80.00	2,650	94.64
OH Non-MSA	1	20.00	150	5.36
Total	5	100.00	2,800	100.00

### Columbus MSA

During the evaluation period, the bank made an excellent level of CD loans in the Columbus MSA. When drawing the conclusions, the OCC considered the level of competition for CD loans within the bank's AA from larger banks and the overall economic conditions impacting the bank's ability to generate CD loans. United Midwest originated four qualified CD loans totaling \$2.7 million which represented 6.77 percent of allocated tier 1 capital as of December 31, 2023, and based on total deposits as of June 30, 2023. The following are examples of CD loans the bank originated or purchased in this AA:

- One SBA PPP loan totaling \$2 million that supported an area business during the COVID-19 pandemic.
- Three loans totaling \$650,000 to an affordable housing organization that provides affordable housing to low- and moderate-income residents within the bank's AA.

### OH Non-MSA

During the evaluation period, the bank made an adequate level of CD loans, based on two years of data and the bank's primary loan products. When drawing the conclusions, the OCC considered the level of competition for CD loans within the bank's AA from larger banks and the overall economic conditions impacting the bank's ability to generate CD loans. United Midwest originated one qualified CD loan totaling \$150,000 which represented 0.77 percent of allocated tier 1 capital as of December 31, 2023, and based on total deposits as of June 30, 2023. This loan was originated to an affordable housing organization.

## Number and Amount of Qualified Investments

Table 4: Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Columbus MSA	1	208	20	2,723	21	70.00	2,931	83.79	0	0
OH Non-MSA	0	0	9	567	9	30.00	567	16.21	0	0
Total	1	208	29	3,290	30	100.0	3,498	100.0	0	0

The Qualified Investment Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified investments. The table includes all CD investments, including prior period investments that remained outstanding as of December 31, 2023.

United Midwest's qualified investment activity demonstrates excellent responsiveness to CD needs, based on excellent responsiveness to CD needs in the Columbus MSA. During the evaluation period, United Midwest made 30 qualified CD investments and donations totaling \$3.5 million or 5.97 percent of total tier 1 capital as of December 31, 2023. Current and prior period investments and donations were responsive to CD needs for affordable housing and community services targeted to low- and moderate-income individuals and families.

### Columbus MSA

The bank had an excellent level of qualified CD investments and donations in the Columbus MSA. United Midwest made 21 qualified investments and donations to CD organizations during the evaluation period in the Columbus MSA, totaling \$2.9 million. This represented 7.49 percent of allocated tier one capital as of December 31, 2023, and total deposits as of June 30, 2023. Donations and investments were primarily for affordable housing and community services to low- and moderate-income individuals and families.

The following are examples of qualified investments in the AA:

- Current period investment of \$1.3 million in mortgage backed securities to support affordable housing for low- and moderate-income individuals or families or in low- and moderate-income areas through securitized low- and moderate-income mortgages.
- Current period investment of \$1.4 million in mortgage backed securities to support affordable housing for low- and moderate-income individuals or families or in low- and moderate-income areas through securitized low- and moderate-income mortgages.

### OH Non-MSA

The bank had an adequate level of qualified CD investments and donations in the OH Non-MSA. United Midwest made nine qualified donations and investments to CD organizations during the evaluation period in the OH Non-MSA, totaling \$567,000. This represented 2.91 percent of allocated tier one capital as of December 31, 2023, and total deposits as of June 30, 2023. Donations and investments were primarily for affordable housing and community services to targeted to low- and moderate-income individuals and families.

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

The following is an example of a qualified investment in the AA:

- Current period investment of \$308,524 in mortgage backed securities to support affordable housing for low- and moderate-income individuals or families or in low- and moderate-income areas through securitized low- and moderate-income mortgages.

### **Extent to Which the Bank Provides Community Development Services**

United Midwest demonstrated adequate responsiveness to CD needs in the AAs through CD services. During the evaluation period, 15 United Midwest employees provided 216 qualified CD hours in the AAs to 11 different organizations. Leadership was evident as the employees primarily served in a leadership role as a board or committee member for a variety of organizations that focus on economic development, financial literacy, affordable housing, or other community services targeted to low- and moderate-income residents. The bank's assistance was responsive to identified needs in the AAs.

As of December 31, 2023, United Midwest had one branch in a moderate-income geography, the State Street Branch in Westerville in the Columbus MSA.

#### Columbus MSA

United Midwest provided an adequate level of CD services in the Columbus MSA. Fourteen bank employees served as a director, board committee member, or volunteer for at least ten CD organizations. In total, the employees provided 174 hours of service to the organizations. Multiple employees served in leadership roles. For example, one employee served as board member and on the loan committee for an organization whose mission is to create and preserve affordable housing homeownership. In summary, the qualified organizations provided community services for low- and moderate-income residents including affordable housing, youth programs, and other community services. Additionally, bank employees provided service hours to organizations that supported economic development and small business development in the AA.

#### OH Non-MSA

United Midwest provided an adequate level of CD services in the OH Non-MSA. One bank employee served as a board member for one qualifying organization that provides affordable housing in Logan County. The employee participated in board and committee meetings throughout the evaluation period for this organization. In total, the employee provided 42 hours of service. The bank has one branch located in Logan County.

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed:</b>	1/1/2021 – 12/31/2023	
<b>Bank Products Reviewed:</b>	Home mortgage, small business, and consumer loans CD loans, qualified investments, CD services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>Ohio</b>		
Columbus MSA	Full-scope	Franklin County, Ohio, in the Columbus, OH MSA 18140
OH Non-MSA	Full-scope	Champaign, Darke, Logan, and Preble Counties in Ohio.

## Appendix B: Summary of State Ratings

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RATINGS			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
United Midwest Savings Bank, National Association	Satisfactory	Outstanding	Satisfactory
State:			
Ohio	Satisfactory	Outstanding	Satisfactory

(\*) The Lending Test and Community Development Test carry equal weight in the overall rating.

## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have

original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

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

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

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

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

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

**Table 7. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.

**Table 8. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/AA. The table also presents aggregate peer data for the years the data is available.

**Table 9. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s AA.

**Table 10. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

**Table 11. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's AA.

**Table 12. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

**Table 13. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.

**Table 14. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/AA.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

## State of Ohio

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2021																			
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Columbus MSA 2021	183,311	41.86	71,286	7.69	66.67	7.60		22.63	27.78	20.38	29.33	5.56	28.15	40.34	0.00	43.81	0.01	0.00	0.05
OH Non-MSA 2021	253,695	58.14	7,140	--	--	--		11.25	52.00	11.90	66.82	44.00	65.94	21.93	4.00	22.16	--	0.00	--
<b>Total</b>	<b>437,006</b>	<b>100.00</b>	<b>78,426</b>	<b>6.40</b>	<b>27.91</b>	<b>6.91</b>		<b>20.72</b>	<b>41.86</b>	<b>19.61</b>	<b>35.63</b>	<b>27.91</b>	<b>31.59</b>	<b>37.24</b>	<b>2.33</b>	<b>41.84</b>	<b>0.01</b>	<b>0.00</b>	<b>0.05</b>

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2022 - 2023																			
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Columbus MSA 2023	5011,872	49.02	71,449	7.13	60.00	9.30		18.36	20.00	18.57	37.20	10.00	37.76	36.91	6.00	33.08	0.40	4.00	0.79
OH Non-MSA 2023	529,237	50.98	8,554	1.21	3.85	1.81		2.84	53.85	4.14	63.93	28.85	65.20	32.02	13.46	28.82	--	0.00	--
<b>Total</b>	<b>10221,109</b>	<b>100.00</b>	<b>80,003</b>	<b>6.18</b>	<b>31.37</b>	<b>8.50</b>		<b>15.87</b>	<b>37.25</b>	<b>17.03</b>	<b>41.49</b>	<b>19.61</b>	<b>40.69</b>	<b>36.12</b>	<b>9.80</b>	<b>32.63</b>	<b>0.34</b>	<b>1.96</b>	<b>0.71</b>

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

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Assessment Area:	Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2021
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Columbus MSA 2021	183,311	41.86	71,286	24.85	16.67	8.61	17.53	16.67	19.87	18.99	44.44	20.25	38.63	22.22	35.29	--	0.00	15.98	
OH Non-MSA 2021	253,695	58.14	7,140	18.86	24.00	6.51	17.08	40.00	20.18	22.96	24.00	23.61	41.10	12.00	33.08	--	0.00	16.61	
<b>Total</b>	<b>437,006</b>	<b>100.00</b>	<b>78,426</b>	<b>23.96</b>	<b>20.93</b>	<b>8.42</b>	<b>17.46</b>	<b>30.23</b>	<b>19.90</b>	<b>19.58</b>	<b>32.56</b>	<b>20.56</b>	<b>39.00</b>	<b>16.28</b>	<b>35.09</b>	--	<b>0.00</b>	<b>16.04</b>	

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Assessment Area:	Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022 - 2023
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Columbus MSA 2023	50	11,872	49.02	71,449	24.68	14.00	9.43	17.90	34.00	21.25	20.28	22.00	21.15	37.14	30.00	32.06	--	0.00	16.11
OH Non-MSA 2023	52	9,237	50.98	8,554	15.48	7.69	8.83	17.90	40.38	22.78	23.12	34.62	25.25	43.50	17.31	29.79	--	0.00	13.35
<b>Total</b>	<b>102</b>	<b>21,109</b>	<b>100.00</b>	<b>80,003</b>	<b>23.40</b>	<b>10.78</b>	<b>9.37</b>	<b>17.90</b>	<b>37.25</b>	<b>21.41</b>	<b>20.68</b>	<b>28.43</b>	<b>21.59</b>	<b>38.03</b>	<b>23.53</b>	<b>31.82</b>	--	<b>0.00</b>	<b>15.82</b>

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

Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Assessment Area:	Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2021																		
	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Columbus MSA 2021	18	1,688	78.26	31,768	12.14	11.11	11.45	20.92	33.33	19.68	25.36	33.33	23.86	41.01	22.22	44.63	0.57	0.00	0.38
OH Non-MSA 2021	5	462	21.74	2,554	--	--	--	19.34	20.00	13.39	62.40	80.00	64.37	18.26	0.00	22.24	--	0.00	--
<b>Total</b>	<b>23</b>	<b>2,150</b>	<b>100.00</b>	<b>34,322</b>	<b>11.22</b>	<b>8.70</b>	<b>10.60</b>	<b>20.81</b>	<b>30.43</b>	<b>19.22</b>	<b>28.16</b>	<b>43.48</b>	<b>26.88</b>	<b>39.29</b>	<b>17.39</b>	<b>42.96</b>	<b>0.52</b>	<b>0.00</b>	<b>0.35</b>

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 Dunn & Bradstreet SBSF Demographics, 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Assessment Area:	Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2022 - 2023																		
	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Columbus MSA 2023	8	740	100.00	58,527	11.78	12.50	10.01	19.71	0.00	16.72	32.08	62.50	32.95	34.78	25.00	39.18	1.65	0.00	1.14
OH Non-MSA 2023	0	0	0.00	5,097	3.38	0.00	2.10	3.77	0.00	3.06	67.80	0.00	67.51	25.05	0.00	27.33	0.00	0.00	0.00
<b>Total</b>	<b>8</b>	<b>740</b>	<b>100.00</b>	<b>63,624</b>	<b>11.18</b>	<b>12.50</b>	<b>9.38</b>	<b>18.57</b>	<b>0.00</b>	<b>15.63</b>	<b>34.63</b>	<b>62.50</b>	<b>35.72</b>	<b>34.08</b>	<b>25.00</b>	<b>38.23</b>	<b>1.53</b>	<b>0.00</b>	<b>1.05</b>

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues <span style="float: right;">2021</span>											
Assessment Area:	Total Loans to Small Businesses			Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Columbus MSA 2021	18	1,688	78.26	31,768	80.64	77.78	43.69	9.95	22.22	9.41	0.00
OH Non-MSA 2021	5	462	21.74	2,554	77.81	60.00	49.96	11.33	40.00	10.87	0.00
<b>Total</b>	<b>23</b>	<b>2,150</b>	<b>100.00</b>	<b>34,322</b>	<b>80.43</b>	<b>73.91</b>	<b>44.16</b>	<b>10.06</b>	<b>26.09</b>	<b>9.52</b>	<b>0.00</b>

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 Dunn & Bradstreet SBSF Demographics, 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues <span style="float: right;">2022 - 2023</span>											
Assessment Area:	Total Loans to Small Businesses			Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Columbus MSA 2023	8	740	100.00	58,527	82.86	100.00	53.28	8.48	0.00	8.66	0.00
OH Non-MSA 2023	0	0	0.00	5,097	77.90	0.00	60.60	10.31	0.00	11.78	0.00
<b>Total</b>	<b>8</b>	<b>740</b>	<b>100.00</b>	<b>63,624</b>	<b>82.50</b>	<b>100.00</b>	<b>53.87</b>	<b>8.61</b>	<b>0.00</b>	<b>8.89</b>	<b>0.00</b>

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

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Assessment Area:	Table 13: Assessment Area Distribution of Consumer Loans by Income Category of the Geography 2021												
	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Columbus MSA 2021	52	388	86.67	14.18	7.69	26.37	17.31	27.56	15.38	31.62	59.62	0.26	0.00
OH Non-MSA 2021	8	60	13.33	0.00	0.00	15.50	0.00	65.46	87.50	19.04	12.50	0.00	0.00
<b>Total</b>	<b>60</b>	<b>448</b>	<b>100.00</b>	<b>12.36</b>	<b>6.67</b>	<b>24.98</b>	<b>15.00</b>	<b>32.43</b>	<b>25.00</b>	<b>30.00</b>	<b>53.33</b>	<b>0.23</b>	<b>0.00</b>

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data.

Due to rounding, totals may not equal 100.0%

Assessment Area:	Table 13: Assessment Area Distribution of Consumer Loans by Income Category of the Geography 2022 - 2023												
	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Columbus MSA 2023	145	867	84.80	12.63	3.45	22.81	11.03	34.43	35.86	28.92	48.28	1.21	1.38
OH Non-MSA 2023	26	127	15.20	2.23	0.00	4.18	26.92	64.91	53.85	28.67	19.23	0.00	0.00
<b>Total</b>	<b>171</b>	<b>994</b>	<b>100.00</b>	<b>11.37</b>	<b>2.92</b>	<b>20.55</b>	<b>13.45</b>	<b>38.12</b>	<b>38.60</b>	<b>28.89</b>	<b>43.86</b>	<b>1.06</b>	<b>1.17</b>

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data.

Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Assessment Area:	Table 14: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower											2021	
	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total Number	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Columbus MSA 2021	52388		86.67	26.19	0.00	17.08	9.62	17.55	13.46	39.18	76.92	0.00	0.00
OH Non-MSA 2021	860		13.33	20.61	37.50	16.51	37.50	18.74	12.50	44.13	12.50	0.00	0.00
<b>Total</b>	<b>60448</b>		<b>100.00</b>	<b>25.48</b>	<b>5.00</b>	<b>17.00</b>	<b>13.33</b>	<b>17.70</b>	<b>13.33</b>	<b>39.82</b>	<b>68.33</b>	<b>0.00</b>	<b>0.00</b>

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Assessment Area:	Table 14: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower											2022 - 2023	
	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total Number	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Columbus MSA 2023	145867		84.80	25.37	6.21	17.40	7.59	18.58	17.24	38.65	68.97	0.00	0.00
OH Non-MSA 2023	26127		15.20	19.15	15.38	15.80	38.46	19.25	19.23	45.80	26.92	0.00	0.00
<b>Total</b>	<b>171994</b>		<b>100.00</b>	<b>24.62</b>	<b>7.60</b>	<b>17.20</b>	<b>12.28</b>	<b>18.66</b>	<b>17.54</b>	<b>39.51</b>	<b>62.57</b>	<b>0.00</b>	<b>0.00</b>

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

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.