PUBLIC DISCLOSURE

July 23, 2025

COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION

First Federal Community Bank of Bucyrus
Charter Number 703920

119 S. Sandusky Ave.
Bucyrus, OH 44820-2220

Office of the Comptroller of the Currency

Cleveland-Pittsburgh-Detroit Field Office
200 Public Square, Suite 1610
Cleveland, OH 44114-2301

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

Contents

Overall CRA Rating

Institution's CRA Rating: This institution is rated **Satisfactory.**

The lending test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on the state rating and the following overall conclusions.
  - A majority if the bank's loans are originated outside the AA.
  - The loan-to-deposit (LTD) ratio is more than reasonable.
  - The bank exhibits an excellent geographic distribution of loans within its assessment areas (AAs).
  - The bank exhibits a reasonable distribution of home mortgage loans to individuals of different income levels.

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.

First Federal Community Bank of Bucyrus' (First Federal or bank) quarterly average LTD ratio of the 16 quarters since the prior CRA evaluation (March 31, 2021, through December 31, 2024) is 98.1 percent. The LTD ratio ranged from a low of 83.4 percent as of March 31, 2022, to a high of 109.8 as of June 30, 2024. The bank's quarterly average LTD ratio of 98.1 percent is more than reasonable compared to peer institutions within their AA. The peer group included four other institutions under $1 billion in assets within the bank's AA. The quarterly average for the peer institutions over the evaluation period was 62.8 percent, with First Federal maintaining the highest quarterly average LTD ratio over the evaluation period.

Lending in Assessment Area

A majority of the bank's loans were outside its AAs during the evaluation period.

The bank originated and purchased 39.4 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Table 1: Lending Inside and Outside of the Assessment Area											2021-2024
	Number of Loans					Dollar Amount of Loans $(000s)					
Loan Category	Inside		Outside		Total #	Inside		Outside			Total $(000s)
	#	%	#	%		$	%	$	%		
Home Mortgage	228	39.4	351	60.6	579	28,233	26.5	78,191	73.5		106,424
Total	228	39.4	351	60.6	579	28,233	26.5	78,191	73.5		106,424
Source: 1/1/2021 - 12/31/2024 Bank Data.											
Due to rounding, totals may not equal 100.0%											

Description of Institution

First Federal is a wholly owned subsidiary of Community Investors Bancorp, Inc., a one-bank savings and loan holding company. Both the main bank office and holding company are headquartered in Bucyrus,

Ohio. As of December 31, 2024, total assets were $317.8 million with $260.3 million in net loans and leases, $241.7 million in total deposits, and $24.4 million in total bank capital. There is no merger or acquisition activity that affected the scope of the bank's operations during the evaluation period

First Federal has six full-service offices in Ohio. Three of the offices, including the main office, are in Bucyrus, Ohio, in Crawford County. The other three branches are in New Washington (Crawford County), Marysville (Union County), and Crestline, Ohio (Crawford County). No other branches have been opened or closed since the previous Community Reinvestment Act (CRA) evaluation in 2021. All offices are in middle-income census tracts (CTs), except for the Bucyrus East Branch located at 2020 East Mansfield Street in Bucyrus which is in a moderate-income CT. The bank's branch locations are accessible to the entire community. All branches have an automated teller machine (ATM) to provide 24-hour banking, in addition to one offsite ATM located in Bucyrus. All offices offer drive-up facilities, except for the main office in Bucyrus. As of the date of this performance evaluation, the First Federal has eight lending centers or loan production offices (LPOs) in Ohio. The bank has LPOs in Grandview, Findlay, Delaware, Bellefontaine, Westerville, Urbana, Sidney, and Mansfield, Ohio. The LPOs are in middle- and upper-income CTs, except for four in moderate-income CTs (Bellefontaine, Findlay, Mansfield, and Sidney).

First Federal is a single state financial institution with two AAs in the state of Ohio, which is the bank's only rating area. The bank's two AAs include Crawford County and Union County in Ohio. Crawford County is not part of a Metropolitan Statistical Area (MSA). Union County is in the Columbus, OH MSA 18140. The bank's AAs meet the requirements of the CRA regulation and do not arbitrarily exclude any low- and moderate-income (LMI) areas. The AA is described in the "Scope of the Evaluation" and "Description of Institution's Operations in Ohio" sections in this performance evaluation.

As of the December 31, 2024, Consolidated Reports of Condition and Income (Call Report) and Uniform Bank Performance Reports (UBPR), First Federal's total loans equaled $260.3 million representing 82.5 percent of total assets. The bank offers a variety of traditional products and services through their full-service banking offices to accommodate their customers, including online and mobile banking. There are no substantial differences in the business focus or services offered between the bank's branches.

First Federal's primary business focus is residential real estate lending. The bank's loan portfolio, as of the December 31, 2024, Call Report, is comprised of real estate loans of 83.0 percent, commercial/industrial loans of 10.8 percent, consumer loans of 3.9 percent, and farm loans of 3.2 percent.

Presently, no legal or financial impediments exist that could restrict or affect First Federal's ability to meet the credit needs of its AAs. The bank's previous CRA evaluation was as of August 30, 2021, and resulted in a "Satisfactory" rating.

Scope of the Evaluation

Evaluation Period/Products Evaluated

Examiners conducted a CRA performance evaluation to assess the bank's record of meeting the credit needs of its entire community, including LMI areas. OCC examiners used the small bank CRA evaluation procedures to assess the bank's performance under the Lending Test. The OCC analyzed lending activity in full-year increments during the evaluation period, January 1, 2022, through December 31, 2024.

The bank's primary lending product is 1-4 family mortgage loans. Loans secured by real estate comprised 83 percent of the bank's loan portfolio with 1-4 family residential comprising 46 percent of the loan portfolio individually. Business loans accounted for 10 percent, consumer loans accounted for 4 percent and farmland and agricultural loans accounted for 7 percent.

The bank's lending performance is based on the primary product, home mortgage lending. While the bank offers a number of other lending products, home mortgages remain the majority of the bank's loan portfolio and primary lending focus during the evaluation period. As a result, examiners did not consider these as part of the performance evaluation to ensure our evaluation was focused on the bank's primary lending products.

To evaluate the bank's home mortgage loan performance, examiners used all Home Mortgage Disclosure Act (HMDA) data for the years 2022, 2023, and 2024. For each AA, the OCC conducted separate analyses. For analysis purposes, examiners compared the bank's lending performance to demographic data from the 2020 U.S. Census data, 2024 U.S. Census date, and 2024 Dun & Bradstreet SBSF Demographic data. No affiliate activity was included in the 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 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.

First Federal has two AAs in the State of Ohio. The AAs are as follows:
- Crawford County, in its entirety, in a non-MSA (Non-MSA AA); and
- Union County, in its entirety, in the Columbus, OH MSA 18140 (MSA AA).

Examiners completed a full-scope review for each AA. The bank's AAs remained the same throughout the evaluation period. A community profile for each AA is provided in the "Description of Institution's Operations in Ohio" in the State of Ohio section of this performance evaluation.

Ratings

The bank's overall rating is based on the State of Ohio rating.

First Federal operates in the state of Ohio, with all branches in Ohio. The state of Ohio rating is based on the performance of both AAs, with most weight on the Non-MSA AA, as this AA produced 82 percent of home mortgage lending activity during the evaluation period. Additionally, approximately 88.6 percent of the bank's total deposits were in the Non-MSA AA as of December 31, 2024, FDIC Deposit Market Share Report. Refer to the "Scope" section under the state section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) (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[1]: Satisfactory.

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

- The bank's distribution of home mortgage loans reflects a reasonable distribution of loans to individuals of different income levels.
- The bank exhibited excellent geographic distribution of loans within the AA.

Description of Institution's Operations in Ohio

First Federal has two AAs located in central Ohio that consist of Crawford and Union Counties. Union County is part of the Columbus, OH MSA 18140 and Crawford County is not in an MSA. The CTs within each AA are contiguous, meet the requirements of the CRA, and do not arbitrarily exclude any LMI areas. The AAs have no designated distressed or underserved CTs. Bank management selected the AAs based on its targeted lending territory, the area with the most deposit and lending activity, and office locations.

<u>Non-MSA AA</u>

Assessment Area(s) - OH Non-MSA						
						2022 - 2024
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	13	0.0	38.5	53.9	7.7	0.0
Population by Geography	42,025	0.0	40.0	50.7	9.3	0.0
Housing Units by Geography	20,019	0.0	41.0	50.4	8.6	0.0
Owner-Occupied Housing by Geography	12,545	0.0	34.9	53.6	11.5	0.0
Occupied Rental Units by Geography	5,383	0.0	55.3	40.4	4.4	0.0
Vacant Units by Geography	2,091	0.0	40.4	57.2	2.4	0.0
Businesses by Geography	1,259	0.0	41.3	50.6	8.1	0.0
Farms by Geography	154	0.0	10.4	68.2	21.4	0.0
Family Distribution by Income Level	11,476	21.4	23.2	23.4	32.0	0.0
Household Distribution by Income Level	17,928	25.4	19.9	21.1	33.6	0.0
Unemployment rate (%)	5.5	0.0	7.4	4.2	4.3	0.0
Households Below Poverty Level (%)	14.1	0.0	17.6	12.5	6.9	0.0
Median Family Income (Non-MSAs - OH)		$66,160			**Median Housing Value**	$93,200
Median Family Income (Non-MSAs - OH) for 2024		$81,600			**Median Gross Rent**	$658
					Families Below Poverty Level	8.6
FFIEC File - 2020 Census FFIEC File - 2024 Census 2024 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						

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[1] This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

The non-MSA AA includes Crawford County, Ohio. The bank has five banking offices throughout this AA, including the main office. There are three offices in Bucyrus, one in New Washington, and one in Crestline, Ohio. Additionally, the bank has an ATM at each office and one offsite ATM in Bucyrus. Management is considering expanding into Richland County through ATMs or other deposit-taking facilities. Bucyrus is the county seat and the largest city in Crawford County. The non-MSA AA consists of 13 CTs, with five moderate-income CTs, seven middle-income CTs, and one upper-income CT. Since the previous CRA evaluation in 2020, the number of moderate-income CTs increased from four to five, middle-income CTs decreased from nine to seven, and upper-income CTs increased from zero to one. There were no MSA delineation changes since the previous CRA evaluation.

According to the 2024 U.S. Census data, the population of the AA is 42,025, with 40 percent of the population living in moderate-income CTs, 50.7 percent living in middle-income CTs, and 9.3 percent living in upper-income CTs. The assessment area continues to experience a small decline in population, with a 1.6 percent decline from the 2015 U.S. Census data (42,725 persons). Low-income families represent 21.4 percent, and moderate-income families represent 23.2 percent of total families in the AA. Based on the median family income in the non-MSA of $81,600, low-income families make less than $40,800 and moderate-income families make at least $40,800 but less than $65,280. The housing costs relative to income may have a limiting effect on mortgage demand among some LMI families. Approximately 8.6 percent of the families live below the poverty level.

Competition in the AA is strong due to the presence of many regional and community banks. Competitors with a significant deposit market share include The Park National Bank, CNB Bank, Peoples Savings and Loan Company, and Huntington National Bank. As of the June 30, 2024, FDIC's Deposit Market Share Report, there were eight financial institutions operating 16 banking offices in Crawford County, including First Federal. The June 30, 2024, FDIC deposit market share data shows First Federal ranks second in overall deposit market share at 20.4 percent. Approximately 88.6 percent of the bank's total deposits are in the non-MSA AA.

First Federal's primary business focus is home mortgage lending. The bank ranks third out of 102 lenders in the non-MSA AA in residential home mortgage volume based on the 2023 Market Share Analysis by Summary Report, with an 8.0 percent lending market share. Top mortgage lenders in the AA include Huntington National Bank, Park National Bank, and Rocket Mortgage. During the evaluation period, 40.7 percent of the bank's home mortgage loan originations and purchases inside the AA were in the non-MSA AA. This is a notable decline from 65.7 percent at the previous CRA evaluation indicating a shift towards loan originations in the MSA AA.

The economic conditions in the AA were overall stable during the evaluation period. The unemployment rate for Crawford County has remained elevated compared to the State of Ohio average during the evaluations period:

Average Annual Unemployment Rates			
	2022	2023	2024
Crawford County	4.5	4.2	4.9
State of Ohio	4.0	3.7	4.3

Source: U.S. Bureau of Labor Statistics

Crawford County is rural and does not have the wide array of factories and technology companies. Major industries in the non-MSA AA include heath care, manufacturing, and retail trade. Primary employers in Crawford County include Avita Health System, Bucyrus Blades Inc, Imasen Bucyrus Technology, Inc., and Timken Co. The county government and local school systems are also primary employers in the county.

As part of this CRA performance evaluation, examiners reviewed information provided from an interview with a representative from an affordable housing organization. The community contact noted the need for additional affordable housing as the area had a large number of elderly on fixed and limited incomes. The community contact did note that the banks are responsive to meeting the needs of their communities.

Columbus MSA AA

Assessment Area(s) - Columbus MSA						
						2022-2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	13	0.0	7.7	46.2	46.2	0.0
Population by Geography	62,784	0.0	6.0	33.9	60.1	0.0
Housing Units by Geography	21,778	0.0	8.7	41.1	50.3	0.0
Owner-Occupied Housing by Geography	16,576	0.0	7.8	38.3	53.9	0.0
Occupied Rental Units by Geography	4,119	0.0	11.3	50.1	38.6	0.0
Vacant Units by Geography	1,083	0.0	12.5	49.2	38.3	0.0
Businesses by Geography	2,088	0.0	4.1	28.7	67.2	0.0
Farms by Geography	230	0.0	10.9	37.8	51.3	0.0
Family Distribution by Income Level	15,138	12.4	15.2	19.3	53.1	0.0
Household Distribution by Income Level	20,695	13.4	12.7	19.7	54.2	0.0
Unemployment rate (%)	2.8	0.0	2.2	4.3	1.9	0.0
Households Below Poverty Level (%)	5.4	0.0	7.5	7.7	3.3	0.0
Median Family Income (MSAs - OH)		$84,088			Median Housing Value	$205,800
Median Family Income (MSAs - OH) for 2024		$103,300			Median Gross Rent	$973
					Families Below Poverty Level	3.42
FFIEC File - 2020 Census FFIEC File - 2024 Census 2024 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						

The Columbus MSA AA included Union County, Ohio, in the Columbus, OH MSA 18140. Union County is one of the ten counties included in the Columbus MSA. The other nine counties in the Columbus MSA include Delaware, Fairfield, Franklin, Hocking, Licking, Madison, Morrow, Perry, and Pickaway; these counties are not in the bank's AA. The bank has one branch in Marysville, Ohio in this AA, with onsite ATM access. Marysville is the county seat and the largest city in Union County. According to the 2024 U.S. Census Data, the MSA AA consists of 13 CTs, with one moderate-income, six middle-income, and six upper-income CTs. There were no MSA delineation changes but there were three additional CTs added to Union County since the previous CRA performance evaluation in 2021.

According to 2024 U.S. Census data the population of the AA was 62,748, increasing from 53,470 at the last performance evaluation. The distribution of the population by CT was 0.0 percent in low-income CTs, 6.0 percent in moderate-income CTs, 33.9 percent in middle-income CTs, and 60.1 percent in upper-income CTs. Household distribution within the AA by income was 13.4 percent low-income, 12.7 percent moderate-income, 19.7 percent middle-income, and 54.2 upper-income. The median family income for the AA in 2024 was $103,300; low-income families make less than $51,650 and moderate-income families make at least $51,650 but less than $82,640.

Competition in the AA is strong due to the presence of many regional and community banks. Competitors with significant deposit market share include Richwood Banking Company, Huntington National Bank, and JPMorgan Chase Bank, National Association. These three financial institutions account for approximately 82 percent of the total deposits in Union County. As of the June 30, 2024, FDIC's Deposit Market Share Report, there were eight financial institutions operating eight banking offices in Union County, including First Federal. The June 30, 2024, FDIC deposit market share data shows First Federal ranks seventh in overall deposit market share at 1.9 percent. Approximately 11.4 percent of the bank's total deposits are in the MSA AA.

Competition within the AA is strong. First Federal ranks 31st out of 199 lenders in the AA based on 2023 HMDA Market Share Analysis Summary Report. First Federal had a market share of 0.7 percent of the lending activity within the AA. The top ten mortgage lenders in the AA account for 40.5 percent of all mortgage activity within the MSA.

The economic conditions within the AA were overall stable during the evaluation period and remain stronger than Crawford County. Over the evaluation period the county's economy showed continued improvements post pandemic. Unemployment rates increased over the evaluation period but remained well-below state unemployment rates.

Average Annual Unemployment Rates			
	2022	2023	2024
Union County	2.8	2.7	3.3
State of Ohio	4.0	3.7	4.3

Source: U.S. Bureau of Labor Statistics

Union County has a diversified economic base, including manufacturing, health services, trade, and government. Primary employers in Union County include Honda of America Manufacturing Inc., Scotts Miracle-Gro Co., Nestle, and Parker Hannifin Corporation. The state and county governments and local school systems are also primary employers in the county.

As part of this CRA performance evaluation, examiners reviewed information provided from an interview with a representative from an affordable housing organization. The community contact noted the need for additional affordable housing within the MSA due to rapidly gentrifying neighborhoods and a lack of new units keeping up with demand. Overall, community contacts found that financial intuitions were meeting the overall needs of their community.

Scope of Evaluation in Ohio

Examiners performed a full-scope evaluation for each AA. The data in the AAs was analyzed and presented as two AAs for purposes of this performance evaluation. Home mortgage lending is the bank's primary lending product and was evaluated under the Lending Test. The OCC used HMDA data from 2022, 2023, and 2024 for the home mortgage lending analysis. Refer to the "Scope of the Evaluation" for more details.

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Ohio Non-MSA and Columbus MSA of full-scope AAs was excellent.

Distribution of Loans by Income Level of the Geography

The bank exhibited excellent 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.

Non-MSA AA

First Federal's distribution of home mortgage loans among CTs of different income levels in the non-MSA AA during the evaluation period is excellent. There are no low-income geographies and five moderate-income geographies in this AA. The percentage of home mortgage loans originated or purchased by the bank in moderate-income CTs is 46.0 percent, which is above both demographic and aggregate lending data of other HMDA reporters at 34.9 percent and 39.9 percent, respectively. There are no low-income tracts in the AA.

Columbus MSA AA

First Federal's distribution of home mortgage loans among CTs of different income levels in the Columbus MSA AA during the evaluation period is excellent. During the evaluation period, the percentage of home mortgage loans originated or purchased by the bank exceeds both the demographic and aggregate lending data of other HMDA reporters, demonstrating overall excellent performance. 9.8 percent of loans originated or purchased by the bank were in moderate-income CTs, compared the 7.8 percent of owner occupied housing units and 4.1 percent of aggregate lending in moderate-income CTs. There are no low-income CTs in the Columbus MSA AA.

Lending Gap Analysis

Overall, examiners did not identify any unexplained, conspicuous gaps in the lending distribution. The OCC reviewed
internal bank reports and maps to identify potential significant gaps in the distribution of loans over the evaluation period.

Distribution of Loans by Income Level of the Borrower

The bank exhibited reasonable distribution of loans to individuals of different income levels given the product lines offered by the bank.

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.

Non-MSA AA

First Federal's distribution of home mortgage loans to borrowers of different income levels during the evaluation period is reasonable. The aggregate HMDA data reflects penetration in all income categories. The bank's distribution of home mortgage lending in the non-MSA AA, where the majority of loans were originated, was 11.2 percent to low-income borrowers, which is below the demographic data of 21.4 percent and the aggregate data reported by other HMDA lenders of 15.2 percent. The bank's distribution of home mortgage lending to moderate-income borrowers in the non-MSA AA is 25.1 percent, which exceeds the demographic of 23.2 percent but is below aggregate data at 28.3 percent.

Examiners considered other factors in the bank's performance during the review, including the cost of homeownership in the AA as an obstacle of homeownership to LMI borrowers. This obstacle may result in fewer opportunities to originate mortgage loans to LMI families. Additionally, 8.6 percent of the families live below the poverty level. Limited income is a substantial obstacle to credit qualification and serves to reduce the number of loans made to low-income borrowers.

MSA AA

First Federal's distribution of home mortgage loans to borrowers of different income levels during the evaluation period is reasonable. The aggregate HMDA data reflects penetration in all income categories. The bank originated a smaller portion of loans in the Columbus MSA AA. The bank's distribution of home mortgage lending to low-income borrowers totals 12.2 percent and is slightly below demographic data of 12.4 percent but exceeds the aggregate data reported by other HMDA lenders of 4.6 percent. The bank's distribution of home mortgage lending in the Columbus MSA AA to moderate-income borrowers of 4.9 percent is significantly below both the peer and aggregate numbers, totaling 15.2 percent and 14.6 percent, respectively.

Competition within the AA is strong. First Federal ranks 31st out of 199 lenders in the AA based on 2023 HMDA Market Share Analysis Summary Report. The top ten mortgage lenders in the AA account for 40.5 percent of all mortgage activity within the MSA.

Responses to Complaints

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

Appendix A: Scope of Examination

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

Time Period Reviewed:	January 1, 2022, to December 31, 2024	
Bank Products Reviewed:	Home mortgage	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	**Type of Exam**	**Other Information**
State of Ohio		
Non-MSA AA	Full Scope	Crawford County, Ohio (entire county)
MSA AA	Full Scope	Union County, Ohio (entire county) in the Columbus, OH MSA 18140

Appendix B: Summary of State Ratings

RATINGS	
Overall Bank:	Lending Test Rating
First Federal Community Bank of Bucyrus	Satisfactory
State:	
Ohio	Satisfactory

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

Geography: A 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/AA.

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

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

Metropolitan Statistical Area: 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

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 30th of each year. Tables without data are not included in this PE.

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

Table 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 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography — 2022 - 2024

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	41	10,831	18.0	5,233	0.0	0.0	0.0	7.8	9.8	4.1	38.3	43.9	31.5	53.9	46.3	64.3	0.0	0.0	0.0
OH Non-MSA	187	17,402	82.0	1,725	0.0	0.0	0.0	34.9	46.0	39.9	53.6	40.6	50.3	11.5	13.4	9.8	0.0	0.0	0.0
Total	**228**	**28,233**	**100.0**	**6,958**	**0.0**	**0.0**	**0.0**	**19.5**	**39.5**	**13.0**	**44.9**	**41.2**	**36.1**	**35.6**	**19.3**	**50.8**	**0.0**	**0.0**	**0.0**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower — 2022 - 2024

Assessment Area:	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	41	10,831	18.0	5,233	12.4	12.2	4.6	15.2	4.9	14.6	19.3	34.2	22.2	53.1	36.6	45.3	0.0	12.2	13.3
OH Non-MSA	187	17,402	82.0	1,725	21.4	11.2	15.2	23.2	25.1	28.3	23.4	18.7	23.3	32.0	24.1	20.0	0.0	20.9	13.3
Total	**228**	**28,233**	**100.00**	**6,958**	**16.3**	**11.4**	**7.2**	**18.7**	**21.5**	**18.0**	**21.1**	**21.5**	**22.5**	**44.0**	**26.3**	**39.0**	**0.0**	**19.3**	**13.3**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%