



PUBLIC DISCLOSURE

August 12, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

National Cooperative Bank
Charter Number: 25093

139 High Street
Hillsboro, Ohio 45133-1474

Office of the Comptroller of the Currency

Washington DC Field Office
400 7th Street
Washington DC 20219

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

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Overall CRA Rating

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

The following table indicates the performance level of National Cooperative Bank (NCB) with respect to the Lending, Investment, and Service Tests:

| Performance Levels | National Cooperative Bank Performance Tests | | |
|---------------------------|--|-----------------|--------------|
| | Lending Test* | Investment Test | Service Test |
| Outstanding | | | |
| High Satisfactory | X | X | X |
| Low Satisfactory | | | |
| Needs to Improve | | | |
| Substantial Noncompliance | | | |

* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- Lending activity reflects good responsiveness to community needs.
- The percentage of loans originated inside the assessment area (AA) is adequate considering the Bank’s business strategy as a nationwide lender.
- The Bank exhibits good geographic distribution of home mortgage loans in the AA.
- The Bank exhibits good distribution of home mortgage loans among individuals of different income levels within the AA.
- The Bank makes extensive use of innovative and flexible lending products that are available to the AA.
- The Bank’s level of CD lending is adequate.
- The institution has a significant level of qualified investments.
- Retail banking services are reasonably accessible to all portions of the AA and to individuals of different income levels.
- NCB provides a relatively high level of community development services.

Lending in Assessment Area

A small percentage of the Bank’s loans are originated in the AA. This percentage is considered adequate given the Bank’s primary business strategy of providing banking products and services to cooperatives and employee-owned businesses across the United States. With this business strategy, a substantial percentage of the Bank’s deposits are derived from customers living outside the Bank’s AA. According to FDIC Summary of Deposit information as of June 30, 2018, the Bank’s total deposits equals \$2.0 billion. In contrast, according to internal Bank information, \$111.1 million of NCB’s total deposits (5.5 percent) are from customers in the AA.

For the combined three-year evaluation period, 95.8 percent of the Bank's total loans were originated outside the AA. In contrast, 4.2 percent of the Bank's total home mortgage loans were originated inside the AA. This analysis is performed at the Bank, rather than the AA, level. The percentages of loans made inside the AA, by loan type, were as follows: home mortgage loans: 3.9 percent; small loans to businesses: 5.7 percent; and small farm loans: 53.3 percent. The following table depicts the percentage of lending inside and outside the AA:

| Lending Inside and Outside of the Assessment Area | | | | | | | | | | |
|--|-----------------|------|---------|------|---------|---------------------------------|------|-----------|------|----------------|
| Loan Category | Number of Loans | | | | Total # | Dollar Amount of Loans \$(000s) | | | | Total \$(000s) |
| | Inside | | Outside | | | Inside | | Outside | | |
| | # | % | # | % | | \$ | % | \$ | % | |
| Home Mortgage | 121 | 3.9 | 2,963 | 96.1 | 3,084 | 11,658 | 0.5 | 2,173,224 | 99.5 | 2,184,822 |
| Small Business | 3 | 5.7 | 60 | 94.3 | 63 | 167 | 0.5 | 31,595 | 99.5 | 31,762 |
| Small Farm | 8 | 53.3 | 7 | 46.7 | 15 | 610 | 42.7 | 820 | 57.3 | 1,430 |
| Total | 132 | 4.2 | 3,030 | 95.8 | 3,162 | 12,435 | 0.6 | 2,205,639 | 99.5 | 2,218,074 |

Description of Institution

National Cooperative Bank, N.A. (NCB, the Bank, or institution) is an intrastate national bank headquartered in Hillsboro, Ohio. NCB is a wholly owned subsidiary of the National Consumer Cooperative Bank (NCCB) that is headquartered in Washington D.C. NCCB was chartered by the United States Congress in 1978. NCB is mandated to provide financial and technical assistance to cooperative enterprises. As of December 31, 2018, NCB had total assets of \$2.4 billion, total loans of \$1.8 billion, and tier 1 capital of \$279.5 million. As of December 31, 2018, NCB operated only one main office in Hillsboro, Ohio. Retail deposit accounts, banking services, and loan products are offered through the Bank's single office in Hillsboro. However, the majority of NCB's operations focus on serving the banking and lending needs of its cooperative entity customers located across the United States.

Since being privatized as a cooperatively-owned financial institution in 1981, NCB is currently owned by approximately 3,100 customer-owners across the country. These customers include grocery wholesaler cooperatives, purchasing cooperatives, credit unions, housing cooperatives, and Native American organizations across the country. Because of the Bank's charter mission, NCB focuses on serving low- and moderate-income communities. Most of these communities are located outside of the Bank's Ohio assessment area. The Bank's business strategy focuses on the following four areas: multi-family and commercial real estate lending, commercial banking, cooperative and community development, and retail banking. Housing cooperatives are primarily concentrated in larger metropolitan areas such as New York City, Chicago, Los Angeles, and Washington D.C. To serve its cooperative customers, the Bank has administrative offices in the cities of Arlington, VA, Anchorage, AK, and New York, NY.

As of December 31, 2018, the Bank's net loans totaled \$1.75 billion representing approximately 73.5 percent of total assets. Approximately 57.8 percent of the loan portfolio is comprised of real estate loans. Multi-family properties, 1-4 family residential properties, and commercial properties represent 30.6 percent, 29.0 percent, and 39.2 percent of the loan portfolio, respectively. Consumer loans account for less than one percent of the total loan portfolio.

A large percentage of the NCB's deposits are derived from customers living outside of the Bank's AA of Highland County, Ohio. According to FDIC deposit market share data as of June 30, 2018, the Bank's total deposits equaled \$2.0 billion. The Bank ranked 1st in total deposits among nine depository institutions in Highland County. However, based upon internal bank information as of June 30, 2018, \$111.11 million of the Bank's deposits (5.5 percent of total deposits) are derived from customers in Highland County and \$1.89 billion (94.5 percent) are from nationwide customers.

NCB offers retail banking services through a single retail office and three cash dispensing ATMs in the city of Hillsboro, Ohio, located in Highland County. Due to economic factors, NCB closed three of its four branch offices. In 2017, the Bank closed one of its two offices in Hillsboro, Ohio. In May of 2018, the Bank closed its remaining two full-service branch offices in the adjoining counties of Clinton and Brown, both located in Southwest Ohio.

NCB offers a wide range of deposit accounts, banking services, and lending products. Deposit accounts include traditional personal and checking and savings accounts. Online banking and mobile banking are also offered. The Bank's lending products include conventional home mortgage loans, consumer loans, and home equity loans. The Bank offers various commercial deposit accounts, banking services, and lending products. Commercial loan products include commercial real estate loans, construction loans, and small business loans. Loans guaranteed by the Small Business Administration are also available. The Bank offers a cooperative housing residential loan product (share loan). In addition, NCB offers a limited array of deposit accounts for consumers living in cooperative housing across the country.

Since the preceding CRA evaluation in 2016, NCB's assessment area changed due to the closing of the branch offices in Brown and Clinton County. Currently, NCB's AA is comprised of Highland County, Ohio. This rural county located in Southwest Ohio has a population of 43,031. Much of the county's economic base is agricultural with approximately 75 percent of the county's land used for farming. Although the county is a one-hour drive from the larger cities of Cincinnati and Columbus, Highland County suffers from a lack of access to major interstates and high unemployment rates higher than state averages. In 2016, 2017, and 2018, unemployment rates in Highland County were 6.6 percent, 5.3 percent, and 6.2 percent, respectively. In comparison, unemployment rates in the State of Ohio in 2016, 2017, and 2018 were 5.2 percent, 4.5 percent, and 4.6 percent, respectively.

There are no known legal, financial, or other factors impeding NCB's ability to help meet the credit needs of its AA. The Bank received a Satisfactory rating in its previous CRA evaluation dated August 8, 2016.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The Bank's CRA performance was evaluated using the Large Bank CRA procedures under a Lending, Investments, and Services test. For the Lending Test, home mortgage loans reported under the HMDA, small loans to businesses, and small loans to small farm reported under the CRA were analyzed. These loan types were reviewed for the period of January 1, 2016 through December 31, 2018. For purposes of this review, primary loan products are products in which the Bank originated at least 20 loans within an AA during one or more of the analysis periods. Based upon this analysis, home mortgage loans represent the majority of loans originated. The volume of small loans to businesses and farms was less than 20 loans. Considering this limited volume, small loans to businesses and small loans to farms were not analyzed for this CRA evaluation. The minimal number of small loans to businesses and farms did not have an adverse impact on the Bank's lending performance.

Due to changes between the 2010 Census and the 2015 American Community Survey (ACS or 2015 Census), 2016 lending activity was analyzed separately from 2017- 2018 lending activity. Analysis of 2016 lending activity data is based upon 2010 Census and analysis of 2017 and 2018 lending data is based upon the 2015 ACS data. Performance Tables O, P, Q, R, S, T, in Appendix C reflect the data from both analysis periods. The evaluation period for CD loans, Qualified Investments and CD Services was from August 6, 2016 through December 31, 2018.

Once we determined that NCB's lending performance was reasonable in the AA, we considered borrower distribution of lending activities outside the AA. In addition, we considered CD loans, qualified investments, and CD services in the statewide and broader regional areas. The broader regional area consists of the Great Lakes Region and the Northeast Region of the United States. The Great Lakes region includes the following states: Ohio, Pennsylvania, New York, Michigan, Minnesota, and Illinois. The Northeast Region includes the following states: Washington D.C., Maryland, New Jersey, Rhode Island, Massachusetts, Connecticut, Vermont, and Maine. The loans, investments, and services fell into one of two categories: 1) originated or provided to organizations or used for activities with a purpose, mandate, or function to serve the Bank's AA or 2) originated or provided to organizations or used for activities without a purpose mandate or function to serve the Bank's AA.

Because NCB does not have a nationwide retail banking footprint, we did not give any weight to the Bank's CD loans originated outside of the broader regional area. Consequently, these CD loans had a neutral impact on the Bank's CD performance.

Selection of Areas for Full-Scope Review

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

Ratings

The Bank's overall rating is based upon the Bank's performance in the full scope AA of Highland County, OH.

NCB is a non-traditional bank that gathers deposits and offers loans across the United States. However, the Bank offers retail banking services and loans through one main office in a rural county in Southwestern Ohio. As a result, the OCC is required to evaluate and determine ratings primarily based on the Bank's CRA performance in the Highland County, Ohio AA.

We also considered borrower income distribution in states outside the AA where the Bank originated or purchased a substantial portion of loans. We selected four states (California, New York, District of Columbia, and Maryland) as a representative sample of the Bank's entire marketplace.

When evaluating lending performance, we placed greater weight on the Bank's lending activity during 2017-2018 as lending activity during this period represents most of the Bank's lending activity during the evaluation period. In addition, we placed more weight on borrower income distribution than geographic distribution. This was due to the limited number of distinct geographies in the AA. There is almost an equal percentage of moderate-income and middle-income census tracts. There are no low-income or upper-income census tracts in the AA.

Refer to the "Scope" section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

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

The OCC has not identified that this institution 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: High Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending activity reflects good responsiveness to community needs.
- Geographic distribution of home mortgage loans is good.
- Borrower income distribution of home mortgage loans is good.
- The Bank makes extensive use of innovative and flexible lending products.
- NCB has made a low level of CD loans in response to AA community development needs.
- Qualified investments is significant.
- Bank services do not vary in ways that inconvenience the AA.
- The Bank provides a high level of CD services.

Description of Institution's Operations in Ohio

NCB operates one retail office and three cash dispensing ATMs in the city of Hillsboro, Ohio located in Highland County.

According to FDIC Summary of Deposit data as June 30, 2018, there were nine depository institutions with 12 branch offices serving Highland County. According to this data, NCB ranked first in deposits (a total of \$2.0 billion in deposits) with a market share of 82.3 percent. The Merchants National Bank and Fifth Third Bank ranked 2nd and 3rd in total deposits with market shares of 9.2 percent and 4.4 percent, respectively. For FDIC deposit reporting purposes, NCB's deposits derived from customers from across the United States are reported in the Bank's single office in Hillsboro. As previously mentioned, internal bank information reflected that approximately \$111.1 million (or 5.5 percent) of the Bank's total deposits are derived from customers in Highland County and \$1.89 billion (or 94.5 percent) of Bank's total deposits are derived from customers outside the AA. Considering the total deposits from Highland County, NCB's market share of deposits would be approximately 20 percent of total deposits, ranking the Bank second in total deposits in Highland County.

NCB's AA of Highland County is a predominately rural area with a total population of 43,170. Approximately 75 percent of the county's land is used for farming. Although Highland County is approximately a one-hour drive from high populated areas such as Columbus and Cincinnati, Highland County is impacted by limited high-speed transportation infrastructure, low wage jobs, and high poverty rates. According to information from the U.S. Bureau of Labor Statistics, Highland County's unemployment rates are higher than the State of Ohio's unemployment rates. In 2016, 2017, and 2018, unemployment rates in Highland County were 6.6 percent, 5.3 percent, and 6.2 percent, respectively. In

comparison, unemployment rates for the State of Ohio in 2016, 2017, and 2018 were 5.2 percent, 4.5 percent, and 4.6 percent, respectively.

In assessing community credit needs, we relied upon information from a community representative of nonprofit organization serving low-income individuals in Highland County. According to the community contact, Highland County suffers from entrenched multi-generational poverty. In addition, county income levels are below both state and national averages. Identified community needs include access to health care, job training programs, access to transportation, access to transitional housing, affordable housing and services for elders. In addition, the contact stated that there were no major community development projects in Highland County.

We reviewed recent housing and demographic data in determining community credit needs in Highland County. Based upon 2015 Census Data, there are no low-income census tracts, four moderate-income census tracts, five middle-income census tracts, and no upper-income census tracts. With the new 2015 Census Data, one middle-income census tract changed to a moderate-income census tract and one moderate-income census tract changed to a middle-income census tract. These changes did not result in an increase in the number of moderate-income or upper-income geographies. Family poverty rates have increased from 12.4 percent (based upon the 2010 Census) to 16.0 percent (based upon the 2015 Census).

The following tables summarize demographic data based upon the 2010 Census and the 2015 Census.

Highland County AA

| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* |
|--|----------|------------------------------|--------------------|------------------|-----------------|-----------|
| Geographies (Census Tracts) | 9 | 0.0 | 44.4 | 55.6 | 0.0 | 0.0 |
| Population by Geography | 43,589 | 0.0 | 37.2 | 62.8 | 0.0 | 0.0 |
| Housing Units by Geography | 19,166 | 0.0 | 43.0 | 57.0 | 0.0 | 0.0 |
| Owner-Occupied Units by Geography | 12,272 | 0.0 | 36.3 | 63.7 | 0.0 | 0.0 |
| Occupied Rental Units by Geography | 4,366 | 0.0 | 53.2 | 46.8 | 0.0 | 0.0 |
| Vacant Units by Geography | 2,528 | 0.0 | 57.9 | 42.1 | 0.0 | 0.0 |
| Businesses by Geography | 1,928 | 0.0 | 46.8 | 53.2 | 0.0 | 0.0 |
| Farms by Geography | 251 | 0.0 | 14.3 | 85.7 | 0.0 | 0.0 |
| Family Distribution by Income Level | 11,795 | 24.0 | 18.6 | 23.3 | 34.0 | 0.0 |
| Household Distribution by Income Level | 16,638 | 26.7 | 16.9 | 18.7 | 37.7 | 0.0 |
| Median Family Income Non-MSAs - OH | \$55,400 | Median Housing Value | | | | \$106,413 |
| | | Median Gross Rent | | | | \$578 |
| | | Families Below Poverty Level | | | | 12.4% |

Source: 2010 U.S. Census and 2016 D&B Data Due to rounding, totals may not equal 100.0
 (*) The NA category consists of geographies that have not been assigned an income classification.

Table A – Demographic Information

Assessment Area: Highland County 2015 Census

| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
|--|--------|------------|------------------------------|---------------|--------------|------------|
| Geographies (Census Tracts) | 9 | 0.0 | 44.4 | 55.6 | 0.0 | 0.0 |
| Population by Geography | 43,170 | 0.0 | 38.0 | 62.0 | 0.0 | 0.0 |
| Housing Units by Geography | 19,256 | 0.0 | 38.1 | 61.9 | 0.0 | 0.0 |
| Owner-Occupied Units by Geography | 11,785 | 0.0 | 32.2 | 67.8 | 0.0 | 0.0 |
| Occupied Rental Units by Geography | 4,911 | 0.0 | 56.1 | 43.9 | 0.0 | 0.0 |
| Vacant Units by Geography | 2,560 | 0.0 | 30.9 | 69.1 | 0.0 | 0.0 |
| Businesses by Geography | 1,965 | 0.0 | 50.3 | 49.7 | 0.0 | 0.0 |
| Farms by Geography | 237 | 0.0 | 17.3 | 82.7 | 0.0 | 0.0 |
| Family Distribution by Income Level | 11,239 | 27.4 | 19.2 | 20.9 | 32.6 | 0.0 |
| Household Distribution by Income Level | 16,696 | 27.7 | 18.2 | 18.5 | 35.6 | 0.0 |
| Median Family Income Non-MSAs - OH | | \$61,400 | Median Housing Value | | | \$101,866 |
| | | | Median Gross Rent | | | \$647 |
| | | | Families Below Poverty Level | | | 16.0% |

Source: 2015 U.S. Census and 2018 D&B Data Due to rounding, totals may not equal 100.0
 (*) The NA category consists of geographies that have not been assigned an income classification.

Scope of Evaluation in Ohio

The Bank’s only AA of Highland County, Ohio received a full-scope review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO

LENDING TEST

The Bank’s performance under the Lending Test is rated High Satisfactory.

Conclusions for Highland County AA Receiving a Full-Scope Review

Based on a full-scope review, the Bank’s performance in the Highland County AA is good.

Lending Activity

Lending levels reflects good responsiveness to AA credit needs.

NCB's lending activity was commensurate with the Bank's business strategy, deposits in the AA, and market presence. The following tables depict the Bank's lending activity during the evaluation period.

| Number of Loans* | | | | | | | |
|-------------------|---------------|----------------|------------|-----------------------|-------|---------------|------------------|
| Assessment Area | Home Mortgage | Small Business | Small Farm | Community Development | Total | % State Loans | % State Deposits |
| Highland County | 121 | 3 | 8 | 2 | 134 | 100% | 100% |
| Broader Statewide | 0 | 0 | 0 | 1 | 1 | 100% | 100% |
| Broader Regional | 0 | 0 | 0 | 15 | 15 | 0% | 0% |

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

| Dollar Volume of Loans* | | | | | | | |
|-------------------------|---------------|----------------|------------|-----------------------|--------------|-----------------|------------------|
| Assessment Area | Home Mortgage | Small Business | Small Farm | Community Development | Total | % State * Loans | % State Deposits |
| Highland County | \$11,658,000 | \$167,000 | \$610,000 | \$ 1,000,000 | \$13,435,000 | 100% | 100% |
| Broader Statewide | | | | \$1,450,000 | \$1,450,00 | 0% | 0% |
| Broader Regional | | | | \$50,134,087 | \$50,134,087 | 0% | 0% |

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

The Bank's deposit market share is larger than the Bank's home mortgage loan market share in the AA. According to FDIC Deposit Market Share data as of June 30, 2018, NCB had \$2.0 billion in deposits with an 82.3 market share in the AA. NCB ranked first in total deposits among nine banks in Highland County. As previously discussed, only 5.5 percent of NCB's deposits are derived from customers in Highland County. Considering this amount of deposits, NCB's deposit market share of deposits in Highland County would equal 20.5 percent, ranking the Bank second among nine banks. NCB originated 121 home mortgage loans during the three-year evaluation period.

According to 2017 peer HMDA data (the most recently available data), there is significant amount of competition for home mortgage loans in the AA. In 2017, NCB ranked third among 116 lenders with a market share of 5.1 percent. Merchants National Bank and Fifth Third Bank ranked first and second with a market shares of 17.9 percent and 11.5, respectively. According to 2016 peer HMDA data, NCB ranked third among 120 lenders with a market share of 5.1 percent. Merchants National Bank and Fifth Third ranked first and second with market shares of 14.7 percent and 13.7 percent, respectively.

As seen from the tables above, there were not enough small loans to businesses or small loans to farms originated during either of the evaluation periods to allow for a meaningful analysis. According to 2016 Small Business Aggregate Data, NCB ranked 19th among 36 lenders with a market share of 0.8 percent in the AA. Based upon 2017 Small Business Aggregate Data, the Bank did not originate any small loans to

businesses in the AA. According to 2016 Aggregate Small Farm data, NCB ranked 4th among 12 other lenders with a market share of 9.6 percent in the AA. According to 2017 Small Farm Aggregate data, the Bank ranked 6th among nine banks with a market share of 5.0 percent in the AA. During 2016, NCB employed one loan originator who actively originated small farm and small business loans. However, after the employee left the Bank, the Bank discontinued its efforts to actively originate these loans products. Since 2017, the Bank offers small business and small farm loans to accommodate bank customers. The minimal amount of lending to small businesses and farms had a neutral impact on overall lending performance.

Distribution of Loans by Income Level of the Geography

The Bank exhibits good geographic distribution of loans in the AA.

Home Mortgage Loans

Refer to Table O in Appendix D for the facts and data used to evaluate the geographic distribution of home mortgage loan originations and purchases.

During the 2016 evaluation period, the geographic distribution was excellent. The proportion of loans in moderate-income geographies nearly equaled to the proportion of owner-occupied housing units in moderate-income geographies. The proportion of loans in moderate-income geographies exceeded aggregate lending.

During the 2017-2018 evaluation period, geographic distribution was good. The proportion of loans in moderate-income geographies was slightly below the proportion of owner-occupied housing units in moderate-income geographies and aggregate lending.

Lending Gap Analysis

The OCC reviewed summary reports, maps, and analyzed NCB's home mortgage lending activity during the evaluation period to identify any gaps in the geographic distribution of loans. There was no evidence of unexplained or conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The Bank exhibits good distribution of loans among individuals of different income levels given the product lines offered by the institution and the Bank's capacity within the AA.

In our analysis, we considered the number of families below the poverty level and affordable housing needs. According to 2010 and 2015 U.S. Census data, 12.4 percent and 16.0 percent of the families in the AA were below the poverty level, respectively. Family poverty rates may have impacted the Bank's ability to originate loans. In addition, affordable housing is an identified need in the AA.

Home Mortgage Loans

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

During the 2016 evaluation period, borrower income distribution was good. The proportion of loans to low-income borrowers was well below the proportion of low-income families. The proportion of loans to moderate-income borrowers exceeded the proportion of moderate-income families. The proportion of loans to low-income borrowers exceeded aggregate lending. The proportion of loans to moderate-income borrowers was slightly below aggregate lending.

During the 2017-2018 evaluation period, borrower income distribution was good. The proportion of loans to low-income borrowers was below the proportion of low-income families. The Bank originated 18.3 percent of its home mortgage loans to low-income borrowers compared to 27.4 percent of the low-income families in the AA. The proportion of loans to low-income families significantly exceeded aggregate lending. Aggregate lending data indicates 8.7 percent of loans were made to low-income borrowers in the AA. The proportion of loans to moderate-income families exceeded the proportion of moderate-income families. The proportion of loans to moderate-income borrowers was near to aggregate lending. The Bank originated 19.7 percent of its home mortgage loans to moderate-income borrowers compared to 19.2 percent of the moderate-income families in the AA. Aggregate lending data indicates 23.5 percent of loans were made to moderate-income borrowers in the AA.

Community Development Lending

The institution has made a low level of CD loans. Refer to the Lending Activity Table, shown above, which sets forth information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

CD lending opportunities in the AA and the Bank's capacity to address these needs was considered. According to the community contact there are numerous CD needs in the AA. These needs include emergency housing, emergency food, health care, affordable childcare, affordable housing, and services for elderly. However, the community contact noted that there were few major community development projects in Highland County.

NCB's level of CD lending was low in the AA and had a neutral impact to our assessment of the lending performance in the AA. The Bank's positive retail lending compensated for the limited amount of CD lending. In 2017 and 2018, the NCB renewed one CD loan for a \$1.0 million or only about 6.4 percent of tier 1 capital allocated to the AA. These loans support a crime and abuse prevention program for a single LMI senior housing facility in Hillsboro, Ohio. While this loan provided needed services for elders, the Bank's overall level of CD lending was not highly responsive to other identified CD needs and the Bank's resources in the AA.

CD Lending Outside of the AA

CD Lending in the Statewide Area of Ohio

The Bank's CD lending in the statewide area positively impacted the Bank's lending test performance. NCB originated a \$1.5 million loan to a Community Development Financial Institution (CDFI) supporting an affordable housing program covering the entire state of Ohio. The Bank's loan, along with capital from other financial institutions and \$4.9 million in federal funding, will create a \$25 million affordable housing loan pool. This housing pool has the potential to provide affordable housing in the AA.

CD Lending in the Broader Regional Area

During the evaluation period, NCB originated 15 CD loans totaling \$50.1 million in the broader regional area. Because these loans did not purpose mandate or function to serve the bank's AA, they had neutral impact on the Bank's lending performance. These CD loans provided financing for affordable housing, economic development initiatives and social services benefiting LMI individuals within the broader regional area. Examples of these CD loans include the following:

- Four loans totaling \$26.4 million to four housing cooperatives providing affordable housing for LMI individuals.
- Three loans totaling \$7.6 million that provided financing for three LMI resident-owned mobile home communities. These loans were made in cooperation with a CDFI.
- A \$3.7 million line of credit to a CDFI for a lending program to assist LMI individuals become homeowners in limited equity housing cooperatives.
- A \$5.9 million loan providing financing for a health care facility serving low-income individuals. Additional financing for this project came from a new market tax credit.

Product Innovation and Flexibility

NCB makes extensive use of innovative and/or flexible lending practices to serve AA credit needs. These products had a positive impact on the Bank's lending performance in the AA.

During the evaluation period, NCB continued to offer its home buyers grant program targeted toward LMI borrowers in the AA. Under this program, the Bank provides forgivable grants up to \$5,000 for down payment or closing costs. In addition, down payment of three percent with private mortgage insurance is available under this program. NCB worked with a private mortgage insurance to provide private mortgage insurance under this loan program. Private mortgage insurance is generally not available for loans with grants as the source of down payment.

During the evaluation period, NCB began offering reduced closing costs on home mortgage loans. While the reduced closing costs are available to all borrowers in the state of Ohio, lower loan costs have the potential to positively benefit LMI borrowers. In June of 2016, NCB began offering a \$499 loan closing cost special. In April of 2017, the Bank reduced the total loan closing costs to \$199. Then in June of 2018, the Bank changed the program by offering a \$1,000 lender credit and \$500 lender credit for home purchases and refinancing, respectively.

NCB also offers Fannie Mae's HomeReady Mortgage Loan. This loan program is targeted to LMI borrowers, features low down payment requirements, and allows alternative sources of down payments and other flexible loan underwriting guidelines.

During the evaluation period, NCB also introduced a new farm loan product for residential farm properties. This program provides financing to borrowers who may not qualify for other conventional Fannie Mae loan products due to larger amounts of acreage. Under this program, the Bank offers financing for residential farms and non-farm residential properties of five to 50 acres. NCB also works with the USDA Farm Agency to assist borrowers to obtain agricultural loans.

Lending Outside the Broader Regional Area

After determining NCB's level of lending within the AA was adequate, we evaluated borrower income distribution in areas outside the AA compared to the distribution of families. The Bank's record of lending to LMI borrowers outside the AA is adequate. For this analysis, we selected states in which the volume was enough to conduct a meaningful analysis. We selected four states (California, New York, District of Columbia, and Maryland) as a representative sample of the Bank's entire marketplace. The distribution of loans to borrowers of different income levels was compared to the distribution of families within each respective state. This analysis is presented in the following two tables.

| Borrower Income Distribution Home Mortgage Loans In States Outside the AA 2016 | | | | | |
|---|------------------|----------------------|-----------------|---------------------------|-----------------|
| State Area | # of Total Loans | Low-Income Borrowers | | Moderate-Income Borrowers | |
| | | % of Families | % of Bank Loans | % of Families | % of Bank Loans |
| CA | 379 | 22.8 | 12.7 | 17.0 | 26.4 |
| NY | 116 | 23.6 | 3.5 | 17.0 | 22.4 |
| DC | 35 | 38.4 | 17.1 | 15.6 | 22.9 |
| MD | 31 | 21.4 | 25.8 | 18.3 | 22.6 |

| Borrower Income Distribution Home Mortgage Loans In States Outside the AA 2017-2018 | | | | | |
|--|------------------|----------------------|-----------------|---------------------------|-----------------|
| State Area | # of Total Loans | Low-Income Borrowers | | Moderate-Income Borrowers | |
| | | % of Families | % of Bank Loans | % of Families | % of Bank Loans |
| CA | 732 | 23.8 | 6.2 | 16.5 | 19.5 |
| NY | 390 | 25.4 | 5.1 | 16.4 | 9.0 |
| DC | 49 | 35.7 | 8.2 | 14.1 | 18.4 |
| MD | 47 | 22.6 | 19.2 | 17.8 | 14.9 |

California

The borrower income distribution of loans to LMI borrowers in California was adequate.

In conducting this analysis, we considered median family income (MFI) and median housing values. According to 2010 Census and 2015 Census, the median housing values were \$482,087 and \$442,845, respectively. In contrast, the MFI for California in 2016, 2017, and 2018 was \$79,542, \$75,009, and \$79,009.

During the 2016 evaluation period, the proportion of loans to low-income borrowers was below the proportion of low-income families. The proportion of loans to moderate-income borrower exceeded the percentage of moderate-income borrowers.

During the 2017 and 2018 evaluation period, the proportion of loans to low-income borrowers was well below the proportion of low-income families. The proportion loans to moderate-income borrowers exceeded the proportion of loans to moderate-income borrowers.

New York

The borrower income distribution of loans to LMI borrowers was adequate.

In conducting this analysis, we considered MFI and median housing values. According to 2010 and 2015 Census Data, the median values of homes in New York were \$372,041 and \$372,326, respectively. In contrast, the MFI in New York in 2016, 2017, and 2018 was \$75,289, \$74,028, and \$81,423, respectively.

During the 2016 evaluation period, the proportion of loans to low-income borrowers was well below the percentage of low-income families. The proportion of loans to moderate-income borrowers exceeded the proportion of moderate-income families.

In 2017 and 2018, the proportion of loans to low-income borrowers was well below the proportion of low-income families. The proportion of loans to moderate-income borrowers was below the proportion of moderate-income families.

District of Columbia (DC)

The proportion of loans to low-income borrowers was adequate.

In analyzing borrower income distribution, we considered the median value of housing and median family incomes. According to 2010 and 2015 Census Data, the median values of homes in DC were \$410,441 and \$497,077, respectively. In comparison, the MFI in DC was \$105,700, \$107,600, and \$114,900, respectively.

In 2016 the proportion of loans to low-income borrowers was well below the proportion of low-income families. The proportion of loans to moderate-income exceeded the proportion of moderate-income families.

In 2017 and 2018, the proportion of loans to low-income borrowers was well below the proportion of low-income families. The proportion of loans to moderate-income borrowers exceeded the percentage of moderate-income borrowers.

Maryland (MD)

The proportion of loans to low-income borrowers was good.

In analyzing borrower income distribution, we considered the median value of housing and median family incomes. According to 2010 and 2015 Census data the median value of homes in MD was \$329,415 and \$295,770. In comparison, the median family incomes in MD were \$93,223, \$96,076, and \$100,474, respectively.

In 2016, the proportion of loans to low-income borrowers exceeded the proportion of low-income families. The proportion of loans to moderate-income exceeded the proportion of moderate-income families.

In 2017-2018, the proportion of loans to low-income borrowers was near to the proportion of low-income families. The proportion of loans to moderate-income borrowers was near to the percentage of moderate-income borrowers.

INVESTMENT TEST

The Bank’s performance under the Investment Test in Ohio is rated High Satisfactory.

Conclusions for Highland County AA Receiving a Full Scope Review

Based on a full-scope review, the Bank’s performance in the Highland County AA is good.

NCB made a significant level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors. The institution exhibits excellent responsiveness to credit and community economic development needs. The institution rarely uses innovative and/or complex investments to support CD initiatives.

Community development opportunities and the Bank’s capacity were considered in assessing the Bank’s performance. Refer to the Qualified Investment Table below for the data and facts used to evaluate the Bank’s qualified investments.

| Qualified Investments | | | | | | | | | | |
|------------------------------|---------------|-----------|----------------|-----------|-------|--------------|-----------|---------------|-----------------------|-----------|
| Assessment Area | Prior Period* | | Current Period | | Total | | | | Unfunded Commitments* | |
| | # | \$(000's) | # | \$(000's) | # | % of Total # | \$(000's) | % of Total \$ | # | \$(000's) |
| Full Scope Review: | | | | | | | | | | |
| Highland County | 1 | \$250 | 15 | \$37 | 16 | 29.1 | \$287 | 2.9 | 0 | 0 |
| Statewide/Regional | 3 | \$1,614 | 5 | \$9 | 8 | 14.6 | \$1,623 | 16.8 | 0 | 0 |
| Broader Regional Area | 2 | \$6,881 | 29 | \$854 | 31 | 56.4 | 7,735 | 80.2 | 0 | 0 |
| Total | 6 | \$8,745 | 49 | \$900 | 55 | 100.00 | \$9,645 | 100.0 | 0 | 0 |

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

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

During the evaluation, NCB made 15 financial grants totaling \$37 thousand in the AA. In addition, the Bank maintained a \$250,000 deposit in minority CDFI made during a prior evaluation period. Total qualified investments and financial grants of \$287,000 represent 1.9 percent of tier 1 capital allocated to the AA.

While none of the Bank’s qualified investments were complex, NCB’s financial grants were responsive to community development needs. The Bank’s financial grants supported nine different community development organizations providing needed services to low-income individuals. Of the total \$37,000 in grants, \$23,000 was provided to five different organizations providing food to low-income and needy individuals and \$6,000 was given to two community organizations providing emergency shelter for the

homeless. According to the community contact, emergency housing and individuals' basic daily necessities were identified needs in Highland County.

Qualified Investments in the Statewide Regional Area

NCB's qualified investments in the statewide area had a positive impact on the Bank's performance under the lending test. During the evaluation period, NCB made five financial grants totaling \$9 thousand in the statewide area. In addition, there were three investments made during prior period with a balance of \$1.6 million. Total qualified investments equaled \$1.6 million and represented 0.5 percent of tier 1 capital.

NCB's grants provided financial support for three community organizations involved in affordable housing and social services initiatives for LMI individuals. These community development organizations did not have a purpose, mandate, or function to serve the AA.

Two of the Bank's prior period investments totaling \$1 million supported affordable housing for LMI individuals across the State of Ohio. The other prior period investment consisted of a \$500 thousand equity investment supported a Rural Business Investment Company (RBIC) serving rural areas in the Central and Southern Appalachian states. These prior period investments have the potential to benefit the AA.

Qualified Investments in the Broader Regional Area

The Bank's qualified investments in the broader regional area had neutral impact on the Bank's overall CRA performance. During the evaluation period, NCB provided 29 qualified investments and grants totaling \$7.7 million within the broader regional area. We also considered two prior period investments totaling \$6.8 million. These prior period investments consisted of one \$6.6 million New Market Tax Credit NMTC and one CDFI investment totaling \$249 thousand. In total, there were 31 qualified investments and grants of \$9.6 million representing 3.5 percent of tier 1 capital. None of these investments had a purpose, mandate of function to serve the AA. The following are examples of the Bank's investments:

- Seven investments totaling \$762 thousand made in seven CDFIs. These CDFIs are depository institutions with stated mission to primarily benefit underserved communities where they are chartered. CDFIs also support economic development initiatives for LMI individuals and in LMI areas.
- Fifteen financial grants totaling \$37 thousand to 11 community organization involved in the provision of social services to low-income individuals.
- Five financial grants totaling \$46 thousand to three community organizations supporting affordable housing initiatives.

SERVICE TEST

The Bank's performance under the Service Test in Ohio is rated High Satisfactory.

Conclusions for Highland County AA Receiving a Full Scope Review

Based on a full-scope review, the Bank's performance in the AA is good.

Retail Banking Services

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

NCB operates a single full-service office in one moderate-income census tract in Hillsboro, Ohio. The Bank also operates three cash dispensing ATMs in the same moderate-income census tract. One ATM is a drive-up ATM located at NCB's main office. The second ATM is in a grocery store and the third ATM is inside of a local non-profit organization.

The distribution of the Bank's office compares favorably with the percentage of the population within moderate-income census tracts. According to the 2010 Census, 38.0 percent of the total population live in the four moderate-income census tracts. The following table reflects the details of the geographic location of NCB's office in relationship to the population living in each of the different geographies in the AA.

| Distribution of Branch Delivery System | | | | | | | | | | | |
|--|--------------------------------|--------------------|--------------------------------|---|-------|-----|-----|---------------------------------------|------|------|-----|
| Assessment Area | Deposits | Branches | | | | | | Population | | | |
| | % of Rated Area Deposits in AA | # of BANK Branches | % of Rated Area Branches in AA | Location of Branches by Income of Geographies (%) | | | | % of Population within Each Geography | | | |
| | | | | Low | Mod | Mid | Upp | Low | Mod | Mid | Upp |
| Highland | 100% | 1 | 100% | 0.0 | 100.0 | 0.0 | 0.0 | 0.0 | 38.0 | 62.0 | 0.0 |

The following table depicts the institution's record of opening and closing branch offices during the evaluation period.

| Distribution of Branch Openings/Closings | | | | | |
|--|----------------------|---|-----|-----|-----|
| Branch Openings/Closings | | | | | |
| # of Branch Openings | # of Branch Closings | Net change in Location of Branches (+ or -) | | | |
| | | Low | Mod | Mid | Upp |
| 0 | 3 | | -1 | -2 | |

To the extent changes have been made, NCB's opening and closing of branches have generally not adversely affected the accessibility of its delivery systems, particularly in moderate-income geographies and/or to low- and moderate-income individuals.

During the evaluation period, NCB closed one of its two full-service branch offices in the AA. This closing of the branch office in a grocery store did not adversely impact access to delivery systems in moderate-income geographies or for LMI individuals. Even though the Bank closed this office, NCB continued to serve customers through its main office that is approximately 2.5 miles away and in the same moderate-income census tract. There were no branch opening during the evaluation period.

NCB closed two branch offices in middle-income census tracts located outside of the Bank's current AA. These offices were in cities Fayetteville (Brown County) and Wilmington, (Clinton Count)

Services and business hours are tailored to the convenience and needs of various portions of the AA, particularly moderate-income geographies and/ or LMI individuals. NCB's business hours are tailored to the convenience and needs of the AA. On Mondays through Thursdays, the Bank is open 9:00 a.m. to 5:00 p.m. The Bank offers extended business hours on Fridays and Saturdays. On Fridays, the Bank is open until 6:00 p.m. and on Saturdays the Bank is open from 9:00 a.m. until 12:00 p.m. In addition, the Bank operates a drive-through window at its main office which has extended hours from 8:30 a.m. until 6:00 p.m. from Mondays through Fridays and from 8:30 a.m. until 2:00 p.m. on Saturdays.

NCB offers a wide range of deposit and banking products and services for both consumer and businesses. Consumer deposit products include traditional checking and savings accounts. The institution also offers a low-cost checking account with no minimum deposit requirements to open and waiver of four foreign ATM fees per month. In addition, NCB offers a student checking account which features a low minimum balance requirement and no monthly service fee with a balance of \$10. The Bank frequently opens this account in connection with financial literacy programs that the Bank conducts at AA schools. Commercial banking services include online cash management services, remote deposit capture, merchant card services, and coin and currency services.

NCB also offers several alternative delivery systems. These systems include online banking and mobile banking. We did not place any significant weight on these products and services, as the Bank did not maintain metrics to determine their effectiveness in serving LMI individuals.

Community Development Services

NCB provides a relatively high level of CD services in the AA. Bank employees provided financial literacy training to LMI students and adults. During the evaluation period, eighteen employees provided 62 financial literacy and career development training to three local schools serving predominately LMI students. Throughout the evaluation period, bank personnel presented at three different financial literacy training programs in the local schools. Bank personnel internally developed one of these programs. In addition, eight employees provided technical assistance to a local non-profit organization to host three career development seminars. This non-profit organization assists and prepares low-income women to re-enter the workforce. Further, two bank employees provided leadership and banking expertise as board members of two local community organizations serving LMI individuals in Highland County.

CD Services in the Statewide Area of Ohio

The Bank's record of CD services in the statewide area had a neutral impact on the Bank's performance under the Service Test. During the evaluation period, two employees provided four hours of CD services. None of these CD services had a purpose, mandate, or function to serve the AA. During the evaluation period, one bank employee participated in a homebuyer seminar targeted to LMI individuals. In addition, one employee provided banking expertise as part of a financial literacy event in a school serving predominately LMI students.

CD Services in the Broader Regional Area

The Bank's record of CD services in the broader regional area had neutral impact of the Bank's overall performance under the Service Test. During the evaluation period, two bank personnel provided four

hours of financial literacy training. The first event consisted of a financial literacy seminar provided to LMI students in a middle school. The other event was a financial literacy workshop targeted to LMI women on ways to save money and track spending and budgeting.

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: | 01/01/2016 – 12/31/2018 | |
| Bank Products Reviewed: | Home Mortgage Loans, Community Development Loans, Qualified investments and Community Development Services. | |
| Affiliate(s) | Affiliate Relationship | Products Reviewed |
| None | | |
| List of Assessment Areas and Type of Examination | | |
| Rating and Assessment Areas | Type of Exam | Other Information |
| | | |
| Ohio | | |
| Highland County | Full-scope | |

Appendix B: Summary of MMSA and State Ratings

| RATINGS National Cooperative Bank (NCB) | | | | |
|---|----------------------|------------------------|---------------------|--------------------------------------|
| Overall Bank: | Lending Test Rating* | Investment Test Rating | Service Test Rating | Overall Bank/State/Multistate Rating |
| Satisfactory | High Satisfactory | High Satisfactory | High Satisfactory | Satisfactory |
| MMSA or State: | | | | |
| Ohio | High Satisfactory | High Satisfactory | High Satisfactory | Satisfactory |
| | | | | |
| | | | | |
| | | | | |

(*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals

the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

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

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

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

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

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

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

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

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

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

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

center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

MMSA (state): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

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

geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

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

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography | | | | | | | | | | | | | | | | | 2016 | | |
|---|----|-------|------------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|------------------------------------|--------------|-----------|--|
| Total Home Mortgage Loans | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | |
| | 50 | 4,480 | 100 | 0.0 | 0.0 | 0.0 | 36.3 | 34.0 | 32.4 | 63.7 | 66.06 | 67.6 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | |
| Total | 50 | 4,480 | 100 | 0.0 | 0.0 | 0.0 | 36.3 | 34.0 | 32.4 | 63.7 | 66.0 | 67.6 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | |

*Source: 2010 U.S Census; 01/01/2016 - 01/31/2016 Bank Data, 2016 Aggregate HMDA Data
Due to rounding, totals may not equal 100.0*

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography | | | | | | | | | | | | | | | | | 2017-2018 | | |
|---|----|-------|------------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|------------------------------------|------------------|-----------|--|
| Total Home Mortgage Loans | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | |
| | 71 | 7,178 | 100 | 0.0 | 0.0 | 0.0 | 32.2 | 28.2 | 31.6 | 67.8 | 71.8 | 68.4 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | |
| Total | 71 | 7,178 | 100 | 0.0 | 0.0 | 0.0 | 32.2 | 28.2 | 31.6 | 67.8 | 71.8 | 68.4 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | |

*Source: 2010 U.S Census; 01/01/2017- 12/31/2018 Bank Data, 2017 Aggregate HMDA Data
2018 Aggregate HMDA Data Not Available. Due to rounding, totals may not equal 100.0*

| Table P : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower | | | | | | | | | | | | | | | | | 2016 | | |
|---|----------|-----------|-----------------------------|----------------------|---------------------|----------------------------------|----------------------|---------------------|--------------------------------|----------------------|---------------------|-------------------------------|----------------------|---------------------|---------------------------------------|----------------------|---------------------|------------------|--|
| Total Home Mortgage Loans | | | Low-Income Borrowers | | | Moderate-Income Borrowers | | | Middle-Income Borrowers | | | Upper-Income Borrowers | | | Not Available-Income Borrowers | | | | |
| | # | \$ | % of Total | % of Families | % Bank Loans | Aggregate | % of Families | % Bank Loans | Aggregate | % of Families | % Bank Loans | Aggregate | % of Families | % Bank Loans | Aggregate | % of Families | % Bank Loans | Aggregate | |
| Highland County | 50 | 4,480 | 100.0 | 24.0 | 8.0 | 7.6 | 18.6 | 22.0 | 22.5 | 23.3 | 30.0 | 28.7 | 34.0 | 36.0 | 28.7 | 0.0 | 4.0 | 17.6 | |
| Total | 50 | 4,480 | 100.0 | 24.0 | 8.0 | 7.6 | 18.6 | 22.0 | 22.5 | 23.3 | 30.0 | 28.7 | 34.0 | 36.0 | 28.7 | 0.0 | 4.0 | 17.6 | |

Source: 2010 U.S Census; 01/01/2016 – 12/31/2017 Bank Data, 2016 Aggregate HMDA Data. Due to rounding, totals may not equal 100.0

| Table P : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower | | | | | | | | | | | | | | | | | 2017-2018 | | |
|---|----------|-----------|-----------------------------|----------------------|---------------------|----------------------------------|----------------------|---------------------|--------------------------------|----------------------|---------------------|-------------------------------|----------------------|---------------------|---------------------------------------|----------------------|---------------------|------------------|--|
| Total Home Mortgage Loans | | | Low-Income Borrowers | | | Moderate-Income Borrowers | | | Middle-Income Borrowers | | | Upper-Income Borrowers | | | Not Available-Income Borrowers | | | | |
| | # | \$ | % of Total | % of Families | % Bank Loans | Aggregate | % of Families | % Bank Loans | Aggregate | % of Families | % Bank Loans | Aggregate | % of Families | % Bank Loans | Aggregate | % of Families | % Bank Loans | Aggregate | |
| Highland County | 71 | 7,178 | 826 | 27.4 | 18.3 | 8.7 | 19.2 | 19.7 | 23.5 | 20.9 | 21.1 | 25.7 | 32.6 | 38.0 | 30.1 | 0.0 | 2.8 | 12.0 | |
| Total | 71 | 7,178 | 826 | 27.4 | 18.3 | 8.7 | 19.2 | 19.7 | 23.5 | 20.9 | 21.1 | 25.7 | 32.6 | 38.0 | 30.1 | 0.0 | 2.8 | 12.0 | |

Source: 2015 U.S Census; 01/01/2017 – 12/31/2018 Bank Data, 2017 Aggregate HMDA Data, "2018 Aggregate HMDA" data not available. Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2016

| Assessment Area: | Total Loans to Small Businesses | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
|------------------|---------------------------------|------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|------------|-----------------------------|--------------|------------|------------|
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | |
| Highland County | 3 | 167 | 100.0 | 360 | 0.0 | 0.0 | 0.0 | 46.8 | 100.0 | 39.7 | 53.2 | 0.0 | 60.3 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Total | 3 | 167 | 100.0 | 360 | 0.0 | 0.0 | 0.0 | 46.8 | 100.0 | 39.7 | 53.2 | 0.0 | 60.3 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017-2018

| Assessment Area: | Total Loans to Small Businesses | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
|------------------|---------------------------------|----------|------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|------------|-----------------------------|--------------|------------|------------|
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | |
| Highland County | 0 | 0 | 0.0 | 326 | 0.0 | 0.0 | 0.0 | 50.3 | 0.0 | 46.3 | 49.7 | 0.0 | 53.7 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Total | 0 | 0 | 0.0 | 326 | 0.0 | 0.0 | 0.0 | 50.3 | 0.0 | 46.3 | 49.7 | 0.0 | 53.7 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, 2018 -" data not available. Due to rounding, totals may not equal 100.0

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues | | | | | | | | | | | 2016 | |
|---|--|-----------|-------------------|-----------------------|---|---------------------|------------------|--|---------------------|---|---------------------|--|
| Assessment Area: | Total Loans to Small Businesses | | | | Businesses with Revenues <= 1MM | | | Businesses with Revenues > 1MM | | Businesses with Revenues Not Available | | |
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | % Businesses | % Bank Loans | |
| Highland County | 3 | 167 | 100.0 | 360 | 81.8 | 100.0 | 47.8 | 4.7 | 0.0 | 13.5 | 0.0 | |
| Total | 3 | 167 | 100.0 | 360 | 81.8 | 100.0 | 47.8 | 4.7 | 0.0 | 13.5 | 0.0 | |
| <i>Source: 2016 D&B Data; 01/01/2016- 12/31/2016 Bank Data; 2016 Peer Data. Due to rounding, totals may not equal 100.0</i> | | | | | | | | | | | | |

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues | | | | | | | | | | | 2017-2018 | |
|--|--|-----------|-------------------|-----------------------|---|---------------------|------------------|--|---------------------|---|---------------------|--|
| Assessment Area: | Total Loans to Small Businesses | | | | Businesses with Revenues <= 1MM | | | Businesses with Revenues > 1MM | | Businesses with Revenues Not Available | | |
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | % Businesses | % Bank Loans | |
| Highland County | 0 | 0 | 0.0 | 326 | 80.2 | 0.0 | 51.5 | 4.5 | 0.0 | 15.3 | 0.0 | |
| Total | 0 | 0 | 0.0 | 326 | 80.2 | 0.0 | 51.5 | 4.5 | 0.0 | 15.3 | 0.0 | |
| <i>Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 Peer Data; "2018 Peer" data not available. Due to rounding, totals may not equal 100.0</i> | | | | | | | | | | | | |

| Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2016 |
|---|----------------------|------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|------------|-----------------------------|--------------|-------------|
| Assessment Area: | Total Loans to Farms | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | |
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate |
| Highland County | 5 | 310 | 100.0 | 52 | 0.0 | 0.0 | 0.0 | 14.3 | 0.0 | 15.4 | 85.7 | 100.0 | 84.6 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Total | 5 | 310 | 100.0 | 52 | 0.0 | 0.0 | 0.0 | 14.3 | 0.0 | 15.4 | 85.7 | 100.0 | 84.6 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |

*Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data. .
Due to rounding, totals may not equal 100.0*

| Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2017-2018 |
|---|----------------------|------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|------------|-----------------------------|--------------|------------------|
| Assessment Area: | Total Loans to Farms | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | |
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate |
| Highland County | 3 | 300 | 100.0 | 60 | 0.0 | 0.0 | 0.0 | 17.3 | 0.0 | 13.3 | 82.7 | 100.0 | 86.7 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Total | 3 | 300 | 100.0 | 60 | 0.0 | 0.0 | 0.0 | 17.3 | 0.0 | 13.3 | 82.7 | 100.0 | 86.7 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |

*Source: 2018 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "2018 CRA Aggregate Data" data not available.
Due to rounding, totals may not equal 100.0*

| Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues | | | | | | | | | | 2016 | |
|---|----------------------|-----|------------|----------------|----------------------------|--------------|-----------|---------------------------|--------------|-----------------------------------|--------------|
| Assessment Area: | Total Loans to Farms | | | | Farms with Revenues <= 1MM | | | Farms with Revenues > 1MM | | Farms with Revenues Not Available | |
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | % Farms | % Bank Loans |
| Highland County | 5 | 310 | 100.0 | 52 | 99.2 | 100.0 | 42.3 | 0.4 | 0.0 | 0.4 | 0.0 |
| Total | 5 | 310 | 100.0 | 52 | 99.2 | 100.0 | 42.3 | 0.4 | 0.0 | 0.4 | 0.0 |

*Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 Peer Data.
Due to rounding, totals may not equal 100.0*

| Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues | | | | | | | | | | 2017-2018 | |
|---|----------------------|-----|------------|----------------|----------------------------|--------------|-----------|---------------------------|--------------|-----------------------------------|--------------|
| Assessment Area: | Total Loans to Farms | | | | Farms with Revenues <= 1MM | | | Farms with Revenues > 1MM | | Farms with Revenues Not Available | |
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | % Farms | % Bank Loans |
| Highland County | 3 | 300 | 100.0 | 60 | 98.3 | 100.0 | 45.0 | 0.4 | 0.0 | 1.3 | 0.0 |
| Total | 3 | 300 | 100.0 | 60 | 98.3 | 100.0 | 45.0 | 0.4 | 0.0 | 1.3 | 0.0 |

*Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 Peer Data.
"2018 Peer Data" not available. Due to rounding, totals may not equal 100.0*