PUBLIC DISCLOSURE

September 2, 2025

COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION

First Federal Savings and Loan Association of Newark
Charter Number: 702893

2 North Second St.
Newark, OH 43055

Office of the Comptroller of the Currency

Central Ohio – Indiana Office
655 Metro Place South, Suite 625
Dublin, OH 43017

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Overall CRA Rating

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

The Lending Test is rated: Outstanding.

The major factors that support this rating include:

- The Lending Test rating is based on the state of Ohio rating and the following overall conclusions:
  - The bank exhibits an excellent geographic distribution of loans.
  - The bank exhibits an excellent distribution of loans to individuals of different income levels.
  - A majority of the bank's loans are inside its assessment area (AA).
  - The bank's loan-to-deposit (LTD) ratio is reasonable.

Loan-to-Deposit Ratio

Considering First Federal Savings and Loan Association of Newark's ("First Federal" or "bank") size, financial condition, and credit needs of the AA, the bank's LTD ratio is reasonable.

First Federal's quarterly average LTD ratio over the 20 quarters since the previous Community Reinvestment Act (CRA) Performance Evaluation (March 31, 2020, to December 31, 2024) is 79.4 percent. The ratio ranged from a high of 99.8 percent as of March 31, 2020, to a low of 67.3 percent as of March 31, 2022. The quarterly average LTD ratio for similarly situated financial institutions located in or near the AA was 80.2 percent for the same period. The custom peer group consisted of one bank in Franklin County, one bank in Fairfield County, one bank in Delaware County, one bank in Muskingum County, and one bank in Perry County. Asset sizes of peer banks ranged from $130 million to $427 million, with the quarterly average LTD ratios ranging from 60 percent to 96.7 percent. During the evaluation period, First Federal sold $35.5 million home mortgage loans to the secondary market.

Lending in Assessment Area

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

The bank originated and purchased 67.5 percent of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

Table 1: Lending Inside and Outside of the Assessment Area										2022 - 2024
	Number of Loans					Dollar Amount of Loans $(000s)				
Loan Category	Inside		Outside		Total #	Inside		Outside		Total $(000s)
	#	%	#	%		$	%	$	%	
Home Mortgage	431	67.45	208	32.55	639	90,423	59.66	61,137	40.34	151,559
Source: 1/1/2022 - 12/31/2024 Bank Data.										
Due to rounding, totals may not equal 100.0%										

Description of Institution

First Federal is a federally chartered, mutual savings and loan association headquartered in Newark, Ohio. As of December 31, 2024, the bank reported total assets of $293 million and $39.7 million in tier 1 capital. The bank's net loans and leases totaled $205.4 million, or 70.1 percent of total assets. The bank's loan portfolio as of the December 31, 2024, Consolidated Report of Condition and Income (call report), was comprised of approximately 81.6 percent in residential real estate (including home equity lines of credit), 18.1 percent in commercial and commercial real estate (business loans), and 0.3 percent in consumer loans. The bank does not offer agriculture loans. The bank's primary lending focus is residential real estate lending (home mortgage). There was no merger or acquisition activity that affected the scope of the bank's operations during the evaluation period.

The bank's main office is in Newark, Ohio, in a low-income census tract (CT) as of the 2020 U.S. Census. In addition to the main office in Newark, First Federal has four other branches in Licking County. The other branches are located in Newark, Granville, Heath, and Pataskala. Each office has a drive-up facility, excluding the Granville branch. The bank does not operate any automated teller machines. The second Newark location is in a moderate-income CT, while the other branches are located in middle-income or upper-income CTs. Additionally, the bank has one loan production office in the Columbus suburb of Gahanna in Franklin County. The bank offers a variety of lending and deposit products and services through its five branches to accommodate its customers, including business, home mortgage, and consumer loans, as well as online and mobile banking.

First Federal is a single-state financial institution with one rating area, the state of Ohio, and one AA. The bank continues to serve Licking County, a part of the Columbus, OH Metropolitan Statistical Area (MSA). Licking County, in its entirety, is the bank's only AA (Columbus MSA) in the state of Ohio. Licking County is in central Ohio, approximately 30 miles east of Columbus, Ohio.

First Federal's lending activities are consistent with its size, expertise, financial capability, and local economic conditions. There are no financial, legal, or other factors that impede the bank's ability to help meet the credit needs of its AA. The bank's previous CRA rating was "Outstanding" as of the CRA Performance Evaluation (PE) dated March 30, 2020.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assesses the bank's record of meeting the credit needs of its entire community, including low- and moderate-income areas. The Office of the Comptroller of the Currency (OCC or examiners) used 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, which includes January 1, 2022, through December 31, 2024.

The OCC evaluated the bank's lending performance based on its primary lending product, home mortgage lending. Based on the number of loans originated and purchased during the evaluation period, residential real estate loans (including home equity and home equity lines of credit) accounted for 95.6 percent, business loans accounted for 2.8 percent, and consumer loans accounted for 1.6 percent. Based on the dollar amount of loans originated and purchased during the evaluation period, residential real estate loans accounted for 86.9 percent, business loans accounted for 13 percent, and consumer loans

accounted for 0.1 percent. Consumer and business loans were not considered in this evaluation as these loan types did not constitute a substantial majority of the bank's lending. Bank management did not request consideration of these loans. The OCC used Home Mortgage Disclosure Act (HMDA) data for each year of the evaluation period for the home mortgage lending analysis.

This evaluation period included one census period. In evaluating the geographic distribution and borrower income distribution under the Lending Test for the HMDA data, examiners compared the bank's lending performance with demographic data from the 2020 U.S. Census. No affiliate activity was included in this analysis. Refer to the table in Appendix A, Scope of the Examination, for more information on the scope of the review.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of 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 one AA in Ohio, as described in the "Description of Institution" and "Description of Institution's Operations in Ohio" sections of the evaluation. The OCC completed a full-scope review of the Columbus MSA.

Ratings

The bank's overall rating is based on the state of Ohio rating. During the evaluation period, First Federal operated all branch offices in a single state. Therefore, its overall rating is based on performance solely in Ohio. The state of Ohio rating is based on performance in the Columbus MSA.

Discriminatory or Other Illegal Credit Practices Review

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

The Lending Test is rated: Outstanding.

The major factors that support this rating include:

- The geographic distribution of home mortgage loans is excellent.
- The bank exhibits an excellent distribution of loans to individuals of different income levels.
- The bank has not received any complaints about its performance in helping to meet the AA's credit needs during the evaluation period.

Description of Institution's Operations in Ohio

The bank's only AA includes Licking County, Ohio, in its entirety. The bank operates in and primarily lends within this county. Bank management selected the AA based on their targeted lending area and office locations. During the evaluation period, the bank operated five full-service branches in Licking County, which is part of the Columbus, OH MSA. The main office is located within a low-income CT in Newark, Ohio. Newark is the county seat and largest city in Licking County.

There are 46 CTs in this AA. As of the 2020 U.S. Census, the AA included 13 upper-income CTs, 21 middle-income CTs, 10 moderate-income CTs, and two low-income CTs. There were no changes to any of the CTs over the review period.

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

Columbus MSA

Assessment Area(s) - Columbus MSA 2024						
						2022 - 2024
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	46	4.35	21.74	45.65	28.26	0.00
Population by Geography	178,519	4.25	21.44	47.19	27.13	0.00
Housing Units by Geography	71,034	4.96	24.74	46.65	23.65	0.00
Owner-Occupied Housing by Geography	46,764	2.11	18.58	50.41	28.89	0.00
Occupied Rental Units by Geography	17,702	11.74	37.05	38.06	13.15	0.00
Vacant Units by Geography	6,568	6.97	35.41	43.00	14.62	0.00
Businesses by Geography	6,123	6.19	18.31	46.81	28.70	0.00
Farms by Geography	464	1.51	13.79	58.62	26.08	0.00
Family Distribution by Income Level	45,293	20.14	19.39	21.95	38.52	0.00
Household Distribution by Income Level	64,466	23.00	16.31	18.25	42.44	0.00
Unemployment rate (%)	3.72	12.81	4.13	3.11	3.40	0.00
Households Below Poverty Level (%)	10.38	43.02	14.16	7.46	6.02	0.00
Median Family Income (18140 - Columbus, OH MSA)		$84,088		**Median Housing Value**		$179,300
Median Family Income (18140 - Columbus, OH MSA) for 2024		$103,300		**Median Gross Rent**		$878
				Families Below Poverty Level		6.82
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						

Demographic Data
As of the 2020 U.S. Census data in the table above, the population of Licking County was 178,519, with 4.3 percent living in low-income CTs, 21.4 percent living in moderate-income CTs, 47.2 percent living in middle-income CTs, and 27.1 percent living in upper-income CTs. The AA included 45,293 families and 64,466 households.

Affordable Housing Cost
According to the 2020 U.S. Census data, the median housing value in the AA was $179,300 and the median family income for the Columbus, OH MSA was $84,088. In 2024, the median family income was $103,300. There were 71,034 housing units in the AA, of which 65.8 percent were owner-occupied, 24.9 percent were rental-occupied, and 9.3 percent were vacant. Low-income families made up 20.1 percent of the families in the AA and moderate-income families made up 19.4 percent of the families in the AA. Families living below the poverty level was 6.8 percent as referenced in the above table.

Assuming a 30-year mortgage with a 6 percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making $51,650 per year (or less than 50 percent of the 2024 Federal Financial Institutions Examination Council (FFIEC) adjusted median family income in the AA) could afford a $215,370 mortgage with a payment of $1,291 per month. The estimated mortgage payment based on home listing data within the Columbus MSA is $1,876, illustrating that low-income borrowers would be challenged to qualify for a mortgage loan in the AA. This limits the bank's opportunities to lend to low-income borrowers.

Job Market and Economic Conditions
Economic conditions in Licking County were overall stable, with some economic expansion due to recent manufacturing investments. As of December 2024, according to the U.S. Bureau of Labor Statistics (BLS), Licking County had an unemployment rate (not seasonally adjusted) of 3.9 percent.

The unemployment rate has been relatively stable during the evaluation period and below the Ohio unemployment rate of 4.2 percent but above the national unemployment rate of 3.8 percent for the same period. The population of Licking County has continued increasing, with the U.S. Census Bureau estimate for 2024 being 184,898, compared to 178,519 recorded during the 2020 U.S. Census. Primary employment sectors included manufacturing, services, retail trade, and healthcare. Significant employers in Licking County included Ascena Retail, Licking Memorial Health Systems, Amazon Web Services, Owens Corning, and Licking County Government.

Competition
Competition in Licking County is substantial and includes a diverse mix of community banks, state banks, and branches of large banks. According to the June 30, 2024, Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, there were 15 financial institutions competing in Licking County, with 42 banking offices in the county. First Federal had the fourth-highest market share, at 6.3 percent and $238.2 million in deposits. This accounted for 100 percent of the bank's total deposits as of June 30, 2024. The top three banks in market share were larger financial institutions and included Park National Bank with 49.8 percent market share, Huntington National Bank with 14.5 percent market share, and JPMorgan Chase Bank, National Association with 12.8 percent market share. These three banks accounted for 77.1 percent of the Licking County market share.

First Federal's primary business focus was mortgage lending. There was strong competition for home mortgage loans in Licking County. The most recent peer mortgage market share data available was from 2023. For 2023, First Federal ranked eighth in mortgage lending market share (Home Mortgage Disclosure Act (HMDA) reporters only) in Licking County with 2.3 percent. The top five lenders included Huntington National Bank, Park National Bank, Rocket Mortgage, PennyMac, and Third Federal Savings and Loan Association. Combined, the top five mortgage lenders in the county held 27.6 percent of the market share. In total, there were 273 mortgage lenders in Licking County in 2023.

Community Contacts/Credit Needs
As part of this CRA performance evaluation, the OCC reviewed information provided from an interview with a representative from a community action organization. The organization indicated they have a familiar relationship with some of the banks in the service area. The community contact believed that several banks in the area were relatively responsive, supportive, and willing to extend credit if needed. Identified needs included affordable housing and utility and food assistance. In general, local financial institutions are adequately meeting the credit and community development needs of the community.

Scope of Evaluation in Ohio

The OCC performed a full-scope review of the Columbus MSA. Home mortgage lending is the bank's primary lending product and was evaluated under the Lending Test. Examiners used 2022, 2023, and 2024 HMDA data for the home mortgage lending analysis, as discussed above.

Lending Test

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Columbus MSA 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.

Examiners compared the percentage of home mortgage loans originated or purchased by the bank to the percentage of owner-occupied housing units (demographic data) in the four geographic income categories, placing emphasis on the low- and moderate-income geographies. Examiners also compared the bank's performance against the percentage of home mortgage loans of other mortgage lenders (aggregate data) in the AA, as demonstrated by HMDA aggregate data.

The geographic distribution of home mortgage loans was excellent. The bank's percentage of home mortgage loans in low-income geographies exceeded both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders (aggregate data). The bank's percentage of home mortgage loans in moderate-income geographies exceeded both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed First Federal's home mortgage lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. Examiners did not identify any unexplained conspicuous gaps in the Columbus MSA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent 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.

Examiners compared the percentage of home mortgage loans originated or purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level (demographic data), placing an emphasis on lending to low- and moderate-income families. Examiners also compared the bank's performance against home mortgage loans of other home mortgage lenders (aggregate data), as demonstrated by HMDA aggregate data.

The distribution of home mortgage loans among individuals of different income levels was excellent. The bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families but exceeded the aggregate percentage of all reporting lenders. Examiners considered the cost of home ownership in the AA as a substantial obstacle to home-ownership, limiting the bank's opportunities to originate mortgage loans to low-income families. Examiners also noted that approximately 6.8 percent of the families in the AA were below the poverty level. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and was near to the aggregate percentage of all reporting lenders.

Responses to Complaints

There were no complaints related to First Federal's CRA performance 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:	1/1/22 to 12/31/24	
Bank Products Reviewed:	Home mortgage loans	
Affiliate(s)	**Affiliate Relationship**	**Products Reviewed**
Not Applicable	Not Applicable	Not Applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	**Type of Exam**	**Other Information**
States - Ohio		
Columbus, OH MSA 18140	Full-Scope	Licking County, Ohio

Appendix B: Summary of State Ratings

RATINGS	
Overall Bank:	Lending Test Rating
First Federal Savings and Loan Association of Newark	Outstanding
State:	
Ohio	Outstanding

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

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

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

Table 11. **Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to $500,000) to farms originated and purchased by the bank in low-, moderate-, middle-,

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

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

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

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

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 2024	431	90,423	100.00	17,635	2.11	5.10	2.80	18.58	26.68	19.40	50.41	48.49	50.25	28.89	19.72	27.43	--	--	--
Total	431	90,423	100.00	17,635	2.11	5.10	2.80	18.58	26.68	19.40	50.41	48.49	50.25	28.89	19.72	27.43	--	--	--

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 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 2024	431	90,423	100.00	17,635	20.14	15.08	10.06	19.39	22.27	22.56	21.95	26.91	24.14	38.52	26.22	28.66	--	9.51	14.57
Total	431	90,423	100.00	17,635	20.14	15.08	10.06	19.39	22.27	22.56	21.95	26.91	24.14	38.52	26.22	28.66	--	9.51	14.57

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.