



PUBLIC DISCLOSURE

May 5, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

National Bank of Indianapolis
Charter Number: 22652

107 N. Pennsylvania St
Indianapolis, IN 46204

Office of the Comptroller of the Currency

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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 The National Bank of Indianapolis (NBI or bank) with respect to the Lending, Investment, and Service Tests:

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

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

The major factors that support this rating include:

- The Lending Test rating is based on the Low Satisfactory rating in Indiana. Lending levels reflect adequate responsiveness to assessment area (AA) credit needs. The bank demonstrated an overall adequate geographic distribution of loans and a poor distribution of loans to borrowers of different income levels. Community Development (CD) loans had a positive impact on the overall Lending Test rating.
- The Investment Test rating is based on the High Satisfactory rating in Indiana. The bank has a good level of qualified CD investments, donations, and grants.
- The Service Test rating is based on the Low Satisfactory rating in Indiana. The service delivery systems are accessible to geographies and individuals of different income levels in the AAs. The overall level of CD services is adequate.
- The bank offered several innovative and flexible loan programs that focused on making home ownership affordable and promoting small businesses, which had a positive impact on the bank's lending performance in Indiana. Additionally, the bank showed responsiveness to the credit needs of its borrowers during the COVID-19 pandemic by participating in the Small Business Administration's (SBA) Paycheck Protection Program (PPP).

Lending in Assessment Area

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

The bank originated and purchased 80.01 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. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Table 1: Lending Inside and Outside of the Assessment Area										2021-2023
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	1,024	77.81	292	22.19	1,316	408,425	76.93	122,496	23.07	530,921
Small Business	1,329	81.89	294	18.11	1,623	365,412	80.61	87,877	19.39	453,289
Small Farm	0	0	2	100.00	2	0	0	200	100.00	200
Total	2,353	80.01	588	19.99	2,941	773,837	78.61	210,573	21.39	984,410
Source: 1/1/2021 - 12/31/2023 Bank Data.										
Due to rounding, totals may not equal 100.0%										

Description of Institution

NBI is a federally chartered national bank serving Indianapolis, Indiana, and the surrounding areas. As of December 31, 2023, the bank had total assets of \$2.9 billion and tier 1 capital of \$258 million. NBI was founded in 1993 and is wholly owned by The National Bank of Indianapolis Corporation (NBIC), also headquartered in Indianapolis, Indiana. NBIC does not have any other subsidiaries.

NBI focuses on offering specialized services to professionals, small to medium sized businesses, not for-profit organizations, and executive clients. NBI offers a broad array of deposit products through its branches, as well as wealth and treasury management services. NBI provides diverse lending services including residential mortgages, commercial loans, and consumer loans. NBI's delivery channels include internet banking, mobile banking, remote deposit capture, private banking, and automated teller machines (ATMs).

As of December 31, 2023, NBI's loan portfolio totaled \$1.7 billion. The portfolio was composed of 33.8 percent commercial real estate, 27.4 percent residential real estate, 20.8 percent commercial and industrial, 13.2 percent construction, 1.5 percent personal, 0.1 percent loans secured by farmland, and 3.2 percent other loans. Net loans and leases represented 59.7 percent of assets and 65.2 percent of total deposits.

During the evaluation period, NBI had one rating area (state of Indiana) and one AA. NBI is an intrastate bank, operating 13 branches and 13 ATMs. All branches are open relatively the same hours and days. No branches have been opened or closed since the last Community Reinvestment Act (CRA) evaluation.

NBI does not have any legal, financial, or other factors that would impede its ability to meet credit needs in the AA. NBI received a "Satisfactory" rating at their previous CRA evaluation, dated April 28, 2022.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assesses NBI's record of meeting the credit and CD needs of its entire community, including low- and moderate-income areas. The Office of the Comptroller of the Currency (OCC) used large bank CRA evaluation procedures to assess the bank's performance under the Lending, Investment, and Service Tests during the evaluation period, January 1, 2021, through December 31, 2023. For the Lending Test, the OCC evaluated home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA) and small loans to businesses reported under CRA, as well as CD lending activities. The bank originated one small farm loan which was not considered during this examination.

The Investment Test considers the bank's responsiveness to CD needs in the AA through qualified investments, grants, and donations. The OCC also considered the complexity and innovativeness of the investments, the responsiveness of the investments to CD needs, and the bank's demonstrated leadership.

The Service Test considers both retail services and CD services. For retail services, the geographic distribution of the bank's branches among low-, moderate-, middle-, and upper-income geographies along with the impact of branch openings and closings were given the most weight. Additionally, the Service Test considers the availability and effectiveness of alternative delivery systems for delivering retail banking services including ATMs, online banking, and mobile banking. The level and responsiveness of CD services was also evaluated.

This evaluation period included two census periods. For analysis purposes, the OCC compared the bank's lending performance with demographic data from the 2015 American Community Survey (ACS) U.S. Census for 2021 home mortgages, the 2020 U.S. Census for 2022 home mortgages, and 2021, 2022, and 2023 Dun and Bradstreet (D&B) data for small business loans, respectively. Two sets of tables are included in Appendix D for each census period. 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 AA(s) 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 section for details regarding how full-scope AAs were selected. Refer to Appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall CRA rating is based on its Lending, Investment, and Service Test performance within the state of Indiana. The state of Indiana rating is based on performance in the Indianapolis-Carmel-Anderson, IN Metropolitan Statistical Area (Indianapolis MSA).

Other Information

Beginning in early 2020, the global economy was adversely affected by the COVID-19 pandemic, which spread worldwide and caused deteriorating economic conditions that resulted from stay-at-home orders and businesses closing to lessen the spread and impact of the virus. NBI responded to customers facing financial hardship during the pandemic by participating in the SBA's PPP, which provided small and mid-sized businesses impacted by the pandemic with funds to cover payroll costs and other expenses. NBI originated 346 PPP loans providing approximately \$61.3 million in critical funding to businesses.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) (March 29, 2024) in determining a national banks or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any 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 Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation. The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

State Rating

State of Indiana

CRA rating for the State of Indiana: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect adequate responsiveness to AA credit needs. The geographic distribution in the Indianapolis MSA is adequate. The distribution of loans among borrowers of different income levels and businesses of different sizes in the Indianapolis MSA is poor. The bank originated 87 CD loans during the evaluation periods, having a positive impact on the overall Lending Test rating.
- NBI has a good level of qualified CD investments, donations, and grants in the Indianapolis MSA. The bank exhibited adequate responsiveness to credit and community development needs.
- The service delivery systems are accessible to geographies and individuals of different income levels in the AA. The overall level of CD services in the Indianapolis MSA is adequate.
- As discussed below, the bank offered several innovative and flexible programs that focused on making homeownership affordable and promoting small business. These programs had a positive impact on the bank's performance.

Description of Institution's Operations in Indiana

Indianapolis MSA

NBI had one AA, located in the Indianapolis MSA. The bank's AA included all of Marion County and portions of Boone, Hamilton, and Johnson Counties. The largest city in the AA, Indianapolis, is in Marion County.

NBI had 13 full-service banking centers, and each location had a deposit-taking ATM. The main office and five branches were in Marion County, six branches were in Hamilton County, and one branch was in Johnson County.

In 2022 and 2023, the AA had 307 geographies with 52 low-income, 85 moderate-income, 84 middle-income, and 78 upper-income census tracts (CTs), and eight CTs with no income designation. One moderate-income CT was in Johnson County, while all other low- and moderate-income CTs were in Marion County. In 2021, the AA had 263 geographies with 59 low-income, 80 moderate-income, 59 middle-income, 64 upper-income CTs, and one CT with no income designation.

Additional data and discussion regarding demographic characteristics, job market, economic conditions, housing cost and affordability, competition, and credit needs of the AA are presented below. This information provides further context for NBI's operations in the Indianapolis MSA.

Demographic Characteristics

Assessment Area(s) - Indianapolis MSA						
2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	263	22.43	30.42	22.43	24.33	0.38
Population by Geography	1,209,052	15.87	27.12	23.86	32.98	0.18
Housing Units by Geography	529,390	17.58	29.04	23.01	30.14	0.23
Owner-Occupied Housing by Geography	276,917	9.63	20.83	27.09	42.35	0.10
Occupied Rental Units by Geography	190,967	23.98	38.73	19.57	17.42	0.31
Vacant Units by Geography	61,506	33.55	35.88	15.38	14.63	0.56
Businesses by Geography	81,129	12.33	21.54	26.25	39.68	0.19
Farms by Geography	2,176	12.78	21.83	24.54	40.72	0.14
Family Distribution by Income Level	286,124	25.04	16.85	17.96	40.15	0.00
Household Distribution by Income Level	467,884	26.43	17.02	16.99	39.56	0.00
Unemployment rate (%)	8.79	17.00	11.67	7.02	4.49	26.54
Households Below Poverty Level (%)	15.50	34.88	20.29	10.68	5.38	49.83
Median Family Income (26900 - Indianapolis-Carmel-Greenwood, IN MSA)		\$66,803	Median Housing Value			\$113,500
Median Family Income (26900 - Indianapolis-Carmel-Greenwood, IN MSA) for 2021		\$79,700	Median Gross Rent			\$810
			Families Below Poverty Level			13.13
FFIEC File - 2010 Census						
2021 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Assessment Area(s) - Indianapolis MSA						
2022 - 2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	307	16.94	27.69	27.36	25.41	2.61
Population by Geography	1,299,770	12.29	26.58	28.61	30.54	1.98
Housing Units by Geography	547,011	14.03	27.04	28.65	28.23	2.05
Owner-Occupied Housing by Geography	293,491	7.44	20.71	31.75	38.60	1.50
Occupied Rental Units by Geography	200,251	20.32	34.47	25.94	16.59	2.68
Vacant Units by Geography	53,269	26.67	34.00	21.81	14.88	2.64
Businesses by Geography	70,549	9.38	21.43	29.49	35.30	4.40
Farms by Geography	1,745	10.32	22.58	31.29	33.87	1.95
Family Distribution by Income Level	293,308	23.06	17.90	19.15	39.88	0.00
Household Distribution by Income Level	493,742	25.43	17.25	18.09	39.22	0.00
Unemployment rate (%)	5.00	9.66	6.44	4.00	2.94	9.51
Households Below Poverty Level (%)	12.71	28.68	17.51	8.45	5.27	21.66
Median Family Income (26900 - Indianapolis-Carmel-Greenwood, IN MSA)		\$80,981	Median Housing Value			\$144,600
Median Family Income (26900 - Indianapolis-Carmel-Greenwood, IN MSA) for 2023		\$97,300	Median Gross Rent			\$936
			Families Below Poverty Level			9.25
FFIEC File - 2020 Census						
2023 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Competition

Competition for deposits in the Indianapolis MSA was strong. As of June 30, 2023, the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report showed NBI and 38 other national, regional, and state banks operated 349 offices in the AA. The top three competitors were JPMorgan Chase Bank, NA with 50 offices and 19.8 percent market share, Merchants Bank of Indiana with three offices and 15.5 percent market share, and PNC Bank, NA with 34 offices and 12.6 percent market share. NBI ranked ninth with deposits of \$2.4 billion for a market share of 3.3 percent.

Competition for home mortgage loans was significant. Based on the 2023 aggregate HMDA data, 629 lenders originated 51,667 home mortgage loans. The top three lenders were Huntington National Bank with 4.8 percent market share, Rocket Mortgage with 3.3 percent market share, and Newrez LLC with 3 percent market share. NBI ranked 39th with 382 loans for a market share of 0.7 percent.

Competition for small business loans was considerable. According to 2023 aggregate CRA data, 124 lenders originated 33,208 small business loans. The top three lenders were JPMorgan Chase, NA with 28.4 percent market share, American Express with 23.8 percent market share, and Capital One, NA with 7.9 percent market share. NBI ranked 15th with 317 loans for a market share of 1 percent.

Economic Conditions and Job Market

The Moody's Analytics Report from February 2024, which analyzes 2023 data, states the Indianapolis MSA's economic growth had slowed slightly but employment growth was outpacing that of Indiana and the nation. The economic drivers were identified as logistics, state capital, and manufacturing. The business cycle was considered as mid-expansion and strengths were the diversified industrial structure and well-developed distribution network, in-demand and growing pharmaceutical industry, high birthrate, strong migration trends, and low business and living costs. The leading industries by wage tier included offices of physicians, computer systems design and related services, insurance carriers, and the federal government. Top employers were Indiana University Health, St. Vincent Hospitals and Health Services, Community Health Network, Eli Lilly and Co., and Walmart Inc.

The unemployment rates for each county in the Indianapolis MSA trended with the statewide rate and were relatively stable during the three-year evaluation period. As shown in the table below, the average annual unemployment rate for Marion County was about 5 percent in 2021 but was lower and near the statewide level in 2022 and 2023. The average rates for Boone, Hamilton, and Johnson Counties remained under 3 percent and below the statewide level in 2021, 2022, and 2023.

Unemployment Rates			
	2021	2022	2023
State of Indiana	3.9	3.1	3.4
Boone County	2.3	2.1	2.6
Hamilton County	2.4	2.2	2.7
Johnson County	2.9	2.5	2.9
Marion County	4.8	3.3	3.5
<i>Source: Bureau of Labor Statistics (Not Seasonally Adjusted)</i>			

Housing Cost and Affordability

A home mortgage loan was not affordable for most low- and moderate-income families in the AA based on the disparity between the median family income and the cost of housing. According to Realtor.com, the median housing value continued to rise each year of the evaluation period. List prices in the MSA increased 6.5 percent to \$276,250 in 2021, 6.9 percent to \$294,000 in 2022, and 5.3 percent to \$304,900 in 2023. These home values were at least 6.3 times the annual income of low-income families and 3.9 times the annual income of moderate-income families.

As shown in the table below, the monthly principal and interest payment for a 30-year mortgage with a 5 percent interest rate was more than 30 percent of the annual income for low-income families and some moderate-income families. This illustrates that housing cost was a barrier to homeownership throughout the evaluation period, particularly for low-income families and some moderate-income families.

Year	Low-Income Families			Moderate-Income Families		
	Annual Income	Affordable Payment	Mortgage Payment	Annual Income	Affordable Payment	Mortgage Payment
2021	\$ 39,850	\$ 996	\$ 1,483	\$ 63,760	\$ 1,594	\$ 1,483
2022	\$ 45,950	\$ 1,149	\$ 1,578	\$ 73,520	\$ 1,838	\$ 1,578
2023	\$ 48,650	\$ 1,216	\$ 1,637	\$ 77,840	\$ 1,946	\$ 1,637

Community Contacts

Indianapolis MSA

The OCC considered information from an April 2025 interview with a representative of a Community Action Agency that serves residents of Boone, Hamilton, Hendricks, Marion and Tipton counties. The representative shared the results of the agency's 2021 and 2024 needs assessment. In rank order, the top five needs were identified as follows:

Community Needs Assessment Comparison		
Rank	2021	2024
1	Good jobs with adequate wages, benefits, and opportunities	Quality and affordable housing
2	Second chance hiring programs	Transportation Support
3	Programs for youth	Food Assistance
4	Assistance with legal services	Mental Health and/or counseling
5	Counseling services	Programs for seniors

The representative noted there are several opportunities for financial institutions to help meet these identified credit and community development needs. These opportunities include the following:

- General operating support,
- Construction gap financing,
- Funds for a home rehab program,
- Financial literacy resources (funds, guest speakers, opening savings accounts),
- Affordable Housing Program/Federal Home Loan Bank sponsor,
- Line of credit financing and below-market construction financing,
- Downpayment and closing cost assistance for low- and moderate-income borrowers, and
- Home repair loan products.

The agency receives support from several financial institutions and the representative acknowledged NBI as a strong partner. The representative further stated other bank partners include First Merchants, Old National Bank, JPMorgan Chase, Huntington National Bank, and CFBank.

Statewide

The OCC considered information from three listening sessions held during August 2023. These sessions were hosted by the FDIC and the Federal Reserve Bank of Chicago (FRB). A total of 18 representatives from community-based organizations serving low- and moderate-income communities participated in these sessions. The participants shared their insights on community and economic development needs and identified opportunities to enhance economic inclusion or increase bank efforts to support affordable housing, small businesses, and stabilization or revitalization efforts throughout Indiana.

Overall, participants agreed that their clients are not in a better economic situation compared to the last two or three years. Their clients are unemployed or underemployed. Because of these economic conditions, people are not making enough money to make ends meet. Those who are working need access to affordable childcare and reliable transportation in the form of a personal vehicle or public transportation.

Participants also agreed that the primary need for low- and moderate-income people is good, quality, safe, and affordable housing. With the increasing housing prices and rents, low- and moderate-income communities want to avoid displacement. Homeownership isn't a viable option for low- and moderate-income people. Therefore, banks should consider meeting people where they are and create bank products that position low- and moderate-income people to purchase homes. Also, post-homeownership counseling should be made available to help people remain in their homes.

Although the COVID-19 pandemic seemed to produce entrepreneurs, small business owners need access to capital and resources to establish and sustain operations. Banks can play a key role by developing relationships with small businesses, increasing awareness of relevant products, and offering trainings. Banks might also want to consider an alternative to the credit score when making loans and investments available to small businesses.

The community development and economic development fields must work together to create opportunities for low- and moderate-income people and communities to thrive. Banks can collaborate with community-based organizations and local government to provide financial literacy, resurrect Bank On coalitions in Indiana, create banking products for the unbanked and underbanked, contribute to Community Loan Centers, and consider establishing bank branches in bank deserts.

Scope of Evaluation in Indiana

Examiners conducted a full-scope review of the Indianapolis MSA.

The OCC based conclusions for the Lending Test on loan products weighted in accordance with their relative volume. As a result, examiners gave more weight to small loans to businesses than home mortgage activity.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN INDIANA

LENDING TEST

The bank's performance under the Lending Test in Indiana is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Lending levels reflected good responsiveness to AA credit needs. In drawing the overall conclusions, examiners considered the bank's operations which are focused on home mortgage and business lending. Examiners also considered the bank's market presence and competition within the AA.

Table 3: Lending Activity						2021 - 2023
Number of Loans						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Indianapolis MSA	1,024	1,329	85	2,438	99.9	99.9
Broader Statewide or Regional Area	0	0	2	2	0.1	0.1
Total	1,024	1,329	87	2,440	100.00	100.00
Dollar Volume of Loans (\$000s)						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Indianapolis MSA	408,425	365,412	88,860	862,697	98.4	98.4
Broader Statewide or Regional Area	0	0	13,940	13,940	1.6	1.6
Total	408,425	365,412	102,800	876,637	100.00	100.00

Source: 1/1/2021 - 12/31/2023 Bank Data.

Due to rounding, totals may not equal 100.0%

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

According to FDIC deposit market share data as of June 30, 2023, NBI ranked 9th out of 39 depository institutions (77th percentile) in the AA, with a 3.3 percent market share.

Based upon 2023 HMDA market share data, the bank ranked 39th out of 629 lenders (94th percentile) in the AA, with a 0.7 percent market share. The top three lenders in the AA were Huntington National Bank, with 4.8 percent market share, Rocket Mortgage, with 3.3 percent market share, and Newrez LLC, with 3 percent market share. The bank's ranking and market share in deposits was greater than the ranking and market share in loans due to significant competition for loans from mortgage companies and online lenders. Based on the bank's volume of home mortgage lending and competition context, the bank's home mortgage lending performance was excellent.

Based upon 2023 CRA small business loan data, the bank ranked 15th out of 124 lenders (88th percentile) in the AA, with a 1 percent market share. The top three lenders in the AA were JP Morgan Chase, with 28.4 percent market share, American Express, with 23.8 percent market share, and Capital One, with 7.9 percent market share. NBI's average loan size was \$342,000, compared to an average of

\$13,000 for the institutions in the top five. Based on the bank's market share and additional context, the bank's performance in lending to businesses was excellent.

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AA(s). The OCC considered the significant competition for loans in the geography and gave more weight, based on relative volume, to the small loans to businesses, as noted in the Scope of Evaluation in Indiana section above.

Home Mortgage Loans

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

The overall geographic distribution of home mortgage loans is poor.

2021

The bank's geographic distribution of home mortgage loans was poor.

The percentage of loans in low-income geographies was below the percentage of owner-occupied housing units and was near to aggregate lending in those geographies.

The percentage of loans in moderate-income geographies was significantly below the percentage of owner-occupied housing units and was well below aggregate lending in those geographies.

2022-23

The bank's geographic distribution of home mortgage loans was very poor.

The percentage of loans in low-income geographies was significantly below the percentage of owner-occupied housing units and was significantly below aggregate lending in those geographies.

The percentage of loans in moderate-income geographies was significantly below the percentage of owner-occupied housing units and was significantly below aggregate lending in those geographies.

Small Loans to Businesses

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

The overall geographic distribution of small loans to businesses was adequate.

2021

The bank's geographic distribution of small loans to businesses was poor.

The percentage of small loans to businesses in low-income geographies was well below the percentage of businesses and was below aggregate lending in those geographies.

The percentage of small loans to businesses in moderate-income geographies was well below the percentage of businesses and was below aggregate lending in those geographies.

2022-23

The bank's geographic distribution of small loans to businesses was good.

The percentage of small loans to businesses in low-income geographies exceeded the percentage of businesses and exceeded aggregate lending in those geographies.

The percentage of small loans to businesses in moderate-income geographies was well below the percentage of businesses and was below aggregate lending in those geographies.

Lending Gap Analysis

The OCC analyzed the bank's geographic lending patterns of home mortgage loans and small loans to businesses by mapping loan originations and purchases throughout the AA. The OCC did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a poor distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

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

The distribution of home mortgage loans to individuals of different income levels is poor.

2021

The bank's borrower distribution of home mortgage loans was poor.

The percentage of loans to low-income borrowers was significantly below the percentage of low-income families and was significantly below aggregate lending in the AA.

The percentage of loans to moderate-income borrowers was near to the percentage of moderate-income families and was below aggregate lending in the AA.

2022-23

The bank's borrower distribution of home mortgage loans was poor.

The percentage of loans to low-income borrowers was significantly below the percentage of low-income families and was significantly below aggregate lending in the AA.

The percentage of loans to moderate-income borrowers was below the percentage of moderate-income families and was significantly below aggregate lending in the AA.

Examiners considered additional context given the housing affordability challenges for low- and moderate-income borrowers outlined in the description of the AA.

Small Loans to Businesses

Refer to Table 10 in the state of Indiana section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The distribution of small loans to businesses of different sizes is poor.

2021

The bank's borrower distribution of small loans to businesses was adequate.

The percentage of small loans to businesses (businesses with gross revenue of \$1 million or less) was significantly below the percentage of small businesses and well below aggregate lending in the AA.

Examiners considered additional performance context. In 2021, the bank had a high level of loans to businesses with revenues not available, at 43.2 percent of bank loans. This compares to just 11.2 percent of bank loans to businesses with revenues not available in 2022-23. The primary reason for the difference is the prevalence of PPP loans continuing until May 31, 2021. Examiners conducted additional analysis of the 2021 data by removing all loans with revenue information not available, reducing the sample size from 686 to 390. Bank loans to businesses with revenues less than \$1 million increased from 22.7 percent to 40 percent after the adjustment. As a result, bank loans to small businesses remained well below the percentage of small businesses but became near to aggregate lending in the AA.

2022-23

The bank's borrower distribution of small loans to businesses was poor.

The percentage of small loans to businesses (businesses with gross revenue of \$1 million or less) was well below the percentage of small businesses and well below aggregate lending in the AA.

Community Development Lending

The institution is a leader in making CD loans.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 85 CD loans, totaling \$88.9 million, in the AA during the evaluation period after adjusting for bank participation in some large participation loans. The bank also made two loans in the broader statewide area, totaling \$13.9 million. These loans represent 33.6 percent of tier 1 capital. By dollar volume, 66.3 percent of the loans were for affordable housing, 20.4 percent funded community services, 8.9 percent funded revitalization and stabilization efforts, and 4.4 percent funded economic development activities.

The following are examples of CD loans the bank originated or purchased in the AA:

- The bank participated in a \$10 million bridge loan, with subsequent lines of credit, that supported affordable housing efforts through a community organization which aids veterans. This loan supported an apartment complex which moved 185 homeless veterans into permanent housing.

- The bank made a \$1.5 million loan that supported community services. This loan supported a Federally Qualified Health Center in a low-income CT with a high volume of Medicare/Medicaid recipients.
- The bank made a \$500,000 loan that supported community services. This loan supported services for disabled individuals in a low-income CT, with most individuals utilizing Medicaid. Services include therapies, employment support, and living assistance.

Product Innovation and Flexibility

The bank uses innovative and/or flexible lending practices in order to serve AA credit needs. The bank offers the HomeReady and First Step mortgage programs for borrowers making 80 percent or less of the area median income. These programs offer low or no down payments, flexible credit score requirements, and no origination fees. During the review period, the bank originated 33 First Step loans, totaling \$5.2 million, and 29 Home Ready loans, totaling \$5 million. In 2021, the bank continued to originate PPP loans, resulting in 346 originations for \$61.3 million before the program ended on May 31, 2021.

INVESTMENT TEST

The bank's performance under the Investment Test in Indiana is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

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

The institution exhibited adequate responsiveness to credit and community development needs. The institution made significant use of innovative and/or complex investments to support CD initiatives.

Table 4: Qualified Investments*										
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Indianapolis MSA	3	2,266	15	533	18	12.2	2,799	18.4	6	9,823
Broader Statewide or Regional Area	5	5,374	125	7,057	130	87.8	12,431	81.6	9	5,698
Total	8	7,640	140	7,590	148	100.0	15,230	100.00	15	15,521

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

During the evaluation period, NBI made 148 qualifying current and prior period investments to 73 different organizations totaling \$15.2 million. Unfunded commitments totaled \$15.5 million. Current period and prior period investments and donations supported affordable housing, community services, economic development, and revitalization/stabilization. The dollar volume of current- and prior-period investments and donations represented 5.9 percent of tier 1 capital.

Indianapolis AA

The following are examples of qualified investments in the AA:

- A \$5 million investment into a capital tax credit equity fund that creates or preserves affordable housing in Hamilton and Marion counties.

- A \$2 million investment into a low-income housing tax credit (LIHTC) that promotes affordable housing and includes transitional housing that empowers women and includes a family center.
- A \$1 million investment into a LIHTC that promotes affordable housing in the AA.

Statewide:

The following are examples of qualified Statewide investments:

- A \$2 million investment into a LIHTC that promotes affordable housing and provides employment for disabled residents.
- A \$5 million investment to a limited purpose organization that operates as a Small Business Investment Corporation whereby loans are granted to small businesses, including businesses located within the bank's AA.
- A \$1.5 million investment into a SBA loan fund that makes loans to small businesses located in low- and moderate-income geographies, including businesses located within the bank's AA.

SERVICE TEST

The bank's performance under the Service Test in Indiana is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Table 5: Distribution of Branch Delivery Systems													2021
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	NA	Low	Mod	Mid	Upp	NA
Indianapolis MSA	100	13	100	0.0	7.7	46.2	46.2	0.0	15.87	27.12	23.86	32.98	0.0
Total	100	13	100	0.0	7.7	46.2	46.2	0.0	15.87	27.12	23.86	32.98	0.0
Source: FFIEC File - 2021 Census 1/1/2021 - 12/31/2021 Bank Data Due to rounding, totals may not equal 100.0%													

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

Table 5: Distribution of Branch Delivery Systems													2022-23
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	NA	Low	Mod	Mid	Upp	NA
Indianapolis MSA	100	13	100	0	0	30.8	69.2	0.0	12.29	26.58	28.61	30.54	0.0
Total	100	13	100	0	0	30.8	69.2	0.0	12.29	26.58	28.61	30.54	0.0
Source: FFIEC File - 2023 Census 1/1/2022 - 12/31/2023 Bank Data Due to rounding, totals may not equal 100.0%													

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

NBI operated 13 branches within the Indianapolis MSA. No branches were located in low-income CTs. As of 2021, one branch was located in a moderate-income CT, six were in middle-income CTs, and six were in upper-income CTs. In 2022 and 2023, branch CTs were adjusted due to the 2020 census resulting in four branches in the middle-income CT and nine in the upper income CT. The OCC also considered the proximity of branches to low- and moderate-income CTs. The bank has two branches located within a mile of low-income CTs and four branches within one mile of moderate-income CTs.

NBI operated 13 full-service ATMs, with one located at each of its branches. To supplement its traditional branch services, the bank offered several alternative delivery channels, including mobile banking, online banking, telephone banking, and remote deposit capture. These options were intended to expand access to banking services across all segments of the AA, including areas that may not be served by a physical branch. The OCC did not place significant emphasis on these alternative delivery systems, as the bank did not maintain metrics to demonstrate how effectively these channels helped meet the credit needs of low- and moderate-income individuals.

Table 6: Distribution of Branch Openings/Closings							
Assessment Area	Branch Openings/Closings		Net change in Location of Branches (+ or -)				
	# of Branch Openings	# of Branch Closings					
			Low	Mod	Mid	Upp	NA
Indianapolis MSA	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0

1/1/2021 - 12/31/2023 Bank Data.

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

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

Services, including where appropriate, business hours, did not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and/or individuals.

The bank's branch service hours were structured in a way that does not inconvenience individuals in its AA, including those in low- and moderate-income geographies. All 13 branches offered access to the bank's full range of loan and deposit products. Ten of the branches operated Monday through Friday from 8:30 a.m. to 5:30 p.m., and also offered Saturday hours from 9:00 a.m. to 12:00 p.m., providing extended access for customers with varying schedules. The remaining three branches, located in downtown Indianapolis, operated Monday through Friday from 8:30 a.m. to 5:00 p.m. and were closed on Saturdays. These downtown branches primarily served business clients and weekly commuters, as they are situated in commercial rather than residential areas. This tailored scheduling reflected an effort to meet the needs of the specific communities each branch serves without disadvantaging low- and moderate-income individuals.

Community Development Services

The institution provided an adequate level of CD services.

Bank employees provided qualified CD service activities to approximately 17 organizations with 993 qualified hours within this AA during the evaluation period. Leadership is evident through board or committee participation in all of these activities with three employees providing 284 service hours. The

bank's assistance was responsive to identified needs in the AA, particularly with community services targeted to low- and moderate-income individuals and economic development.

Service activity examples during the evaluation period include:

- A bank employee provided 116 hours advising on financial and policy matters and participated in funding approvals for programs serving the poor, and Asset Limited Income Constrained Employed residents of Marion and contiguous counties.
- A bank employee provided 108 hours as a board member of an organization that supports young vulnerable children in low- and moderate-income geographies in Indiana. Programs support growth and sustainability in high-need geographies and populations through targeted investments in technical and financial assistance, including a broad range of health, nutrition, social, and education services.
- A bank employee provided 60 hours as a Director and Member of the Executive Committee at one of the state's leading certified development companies accredited by the U.S. SBA. The organization is an SBA Certified Development Corporation assisting growing businesses with obtaining SBA 504 financing for equipment and real estate financing. They serve all of Indiana and parts of Kentucky.

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:	1/1/2021 – 12/31/2023	
Bank Products Reviewed:	Home mortgage and small business Community development loans, qualified investments, community development services	
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
MMSA(s)		
Indianapolis MSA	Full scope	The bank’s AA includes all of Marion County along with portions of Boone, Hamilton, and Johnson Counties.

Appendix B: Summary of MMSA and State Ratings

RATINGS				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
National Bank of Indianapolis	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
State:				
Indiana	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2 of this title, and that is not an excluded transaction under 12 CFR 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 CD loans and qualified investments, branch distribution, and CD services).

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

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

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

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5

million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: 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 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/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 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Indianapolis MSA	310	136,278	100.00	78,127	9.63	6.77	7.50	20.83	9.03	17.93	27.09	17.74	25.66	42.35	66.45	48.84	0.10	--	0.07
Total	310	136,278	100.00	78,127	9.63	6.77	7.50	20.83	9.03	17.93	27.09	17.74	25.66	42.35	66.45	48.84	0.10	--	0.07
Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Indianapolis MSA	714	272,147	100.00	79,000	7.44	3.22	8.24	20.71	5.74	20.65	31.75	16.53	32.59	38.60	73.39	37.05	1.50	1.12	1.47
Total	714	272,147	100.00	79,000	7.44	3.22	8.24	20.71	5.74	20.65	31.75	16.53	32.59	38.60	73.39	37.05	1.50	1.12	1.47
Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2021
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
Indianapolis MSA	310	136,278	100.00	78,127	25.04	2.90	9.88	16.85	13.87	18.64	17.96	9.35	18.91	40.15	71.94	35.71	--	1.94	16.86
Total	310	136,278	100.00	78,127	25.04	2.90	9.88	16.85	13.87	18.64	17.96	9.35	18.91	40.15	71.94	35.71	--	1.94	16.86
Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2023
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
Indianapolis MSA	714	272,147	100.00	79,000	23.06	2.94	11.61	17.90	7.98	21.73	19.15	6.30	19.58	39.88	79.97	31.54	--	2.80	15.54
Total	714	272,147	100.00	79,000	23.06	2.94	11.61	17.90	7.98	21.73	19.15	6.30	19.58	39.88	79.97	31.54	--	2.80	15.54
Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2021
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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Indianapolis MSA	686	150,122	100.00	31,602	12.33	7.87	10.96	21.54	13.41	19.32	26.25	27.55	26.14	39.68	50.73	43.38	0.19	0.44	0.21
Total	686	150,122	100.00	31,602	12.33	7.87	10.96	21.54	13.41	19.32	26.25	27.55	26.14	39.68	50.73	43.38	0.19	0.44	0.21
Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 Dunn & Bradstreet SBSF Demographics, 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2023
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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Indianapolis MSA	643	215,290	100.00	59,092	9.38	10.26	7.74	21.43	12.60	19.09	29.49	28.46	30.14	35.30	45.72	40.11	4.40	2.95	2.92
Total	643	215,290	100.00	59,092	9.38	10.26	7.74	21.43	12.60	19.09	29.49	28.46	30.14	35.30	45.72	40.11	4.40	2.95	2.92
Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Indianapolis MSA	686	150,122	100.00	31,602	85.38	22.74	44.59	7.55	34.11	7.07	43.15
Total	686	150,122	100.00	31,602	85.38	22.74	44.59	7.55	34.11	7.07	43.15
Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 Dunn & Bradstreet SBSF Demographics, 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Indianapolis MSA	643	215,290	100.00	59,092	83.23	28.30	51.32	8.67	60.50	8.10	11.20
Total	643	215,290	100.00	59,092	83.23	28.30	51.32	8.67	60.50	8.10	11.20
Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											