

PUBLIC DISCLOSURE

July 12, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Richwood Banking Company, Inc.
RSSD #150727

28 North Franklin Street
Richwood, Ohio 43344

Federal Reserve Bank of Cleveland

P.O. Box 6387
Cleveland, OH 44101-1387

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, nor should it 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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INSTITUTION'S CRA RATING: SATISFACTORY.

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory.

The major factors and criteria contributing to this rating include:

- The loan-to-deposit ratio is reasonable given the institution's size, financial condition, and assessment area (AA) credit needs;
- A majority of loans and other lending-related activities are in the AA;
- The distribution of loans to borrowers reflects a reasonable penetration among individuals of different income levels (including low- and moderate-income (LMI)) and businesses and farms of different sizes;
- The geographic distribution of loans reflects an excellent dispersion throughout the AA;
- There were no Community Reinvestment Act (CRA)-related complaints filed against the bank since the previous evaluation; and,
- The bank's community development performance demonstrates an adequate responsiveness to the community development needs of the AA, considering the bank's capacity and the need and availability of such opportunities in the bank's AA.

SCOPE OF EXAMINATION

The Federal Financial Institutions Examination Council's (FFIEC's) Interagency Examination procedures for Intermediate Small Institutions was utilized to evaluate The Richwood Banking Company's (Richwood) CRA Performance under Regulation BB. The evaluation considered CRA performance context, including Richwood's asset size, financial condition, business strategy and market competition, as well as the demographics, economic characteristics, and credit needs of the AAs.

The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 amended Home Mortgage Disclosure Act (HMDA) to add new data points. These changes were effective January 1, 2018 and included the reporting of home equity loans for certain institutions, the addition of new loan purposes, and changes to the definitions of some existing fields. Due to these changes, HMDA-reportable loans originated or purchased on or after January 1, 2018 are separated from loans made before that date. Ultimately these changes did not have a significant impact on Richwood's HMDA reporting.

Richwood's CRA performance was evaluated based on HMDA-reportable lending data for the period of July 1, 2016 through December 31, 2020 and small business, small farm, consumer, and home equity lending for the period of January 1, 2020 through December 31, 2020. HMDA-reportable loans are comprised of home purchase and refinance loans. Due to limited volumes HMDA-reportable home improvement and multi-family loans were not considered in this evaluation. Home equity loans were only evaluated in the Columbus AA, the only AA with

enough volume to conduct a meaningful analysis. Non-reportable consumer loans are comprised of motor vehicle, other secured, and other unsecured loans. Due to limited volumes non-reportable consumer loans were combined, and HMDA-reportable loans were combined in Nonmetropolitan Ohio to conduct meaningful analyses. Lastly, non-reportable consumer loans were not considered in the Springfield MSA due to limited volumes.

Community development activities were reviewed for the period between March 21, 2017 through July 12, 2021 as part of this evaluation. Community development activities are comprised of community development loans, investments, and services.

From April to December 2020, Richwood facilitated 2,036 loans through the U.S. government's Paycheck Protection Program (PPP) totaling \$101.5 million to help small businesses impacted by the COVID-19 emergency. Consistent with intermediate small bank procedures and information provided in the March 19, 2020, joint statement on CRA Consideration for Activities in Response to COVID-19, Richwood opted to include its PPP loans in amounts of \$1.0 million or less that are in LMI tracts for consideration under the community development test instead of the retail lending test.

The determination of which AAs received full-scope versus limited-scope evaluations was based on the following criteria; the volume of lending by number of loans and dollar amount as a percentage of overall lending activity, deposit market share, number of branches, percentage of total deposits, percentage of LMI geographies, volume of community development activity, and other non-financial considerations. Lastly, AAs not subject to full-scope reviews at the previous evaluation were considered to ensure in-depth analyses of all AAs with deposit-taking facilities receive full-scope evaluations at some time.

For this evaluation, Richwood has the following three CRA delineated AAs:

- Columbus, OH MSA #18140 (Columbus MSA) – full-scope evaluation
 - Consists of portions of Delaware and Madison counties, and the entirety of Union County (excluding Fairfield, Franklin, Hocking, Licking, Morrow, Perry, and Pickaway counties)
- Springfield, OH MSA #44220 (Springfield MSA) – full-scope evaluation
 - Consists of the entirety of Clark County
- Nonmetropolitan Ohio – limited scope evaluation
 - Consists of portions Marion County and the entireties of Logan and Champaign¹ counties
 - In 2016 the AA consisted of 16 (two moderate-, nine middle-, and five upper-income) total tracts. In 2017–2018, the AA consisted of 16 (two moderate-, 10 middle-, and four upper-income) total tracts. In 2019–2020, the AA consisted of 23 (three moderate-, 14 middle-, six upper-income) total tracts.

¹Nonmetropolitan Ohio AA – Richwood added the entirety of Champaign County in 2019 after the acquisition of Home City, previously only a portion of the county consisting of three tracts (101.00, 115.01, 115.06) was part of this AA.

- Marion County had one middle-income census tract designated as distressed due to poverty in 2016 and 2017.

The Columbus AA was given the greatest weight in the evaluation, as it contained the largest percentage of loans (by number and dollar amount), total deposits, and branches followed by the Springfield MSA and Nonmetropolitan Ohio, respectively. A sample of revenues for small business and small farm and borrower income for consumer loans was obtained. Borrower distribution received more weight than geographic distribution in this evaluation, primarily because the overall percentage of LMI families is greater than the percentage of LMI geographies. However, geographic distribution received more weight than borrower distribution in the Springfield MSA.

Based on the total loan volume by number and dollar amounts available (unless stated otherwise), small business loans received the greatest weight followed by HMDA-reportable, small farm, non-reportable consumer, and home equity loans.

Aggregated lending data, which is comprised of lending activity for all other lenders reporting home mortgage loans under HMDA in the respective AAs, was utilized as a comparison in evaluating Richwood's lending performance in 2016, 2017, 2018, 2019, and 2020.

To better understand AA community development and credit needs, several sources were utilized, including publicly accessible data and information submitted by the bank. There were three community contact interviews conducted with representatives from an economic development agency that serves all three AAs and two affordable housing agencies operating inside Richwood's AAs. These individuals have expertise in their respective fields and are familiar with the economic, social, and demographic characteristics and community development opportunities in the assessment area. Information obtained from these interviews helped establish context for the communities in which Richwood operates and gather information on its performance. More detailed information obtained from these contacts is included in the Description of the Institution's Operations section for each full-scope assessment area.

DESCRIPTION OF INSTITUTION

Richwood is an intrastate community bank and is a banking subsidiary of Richwood Bancshares, Inc. Both entities are headquartered in Richwood, Ohio. Richwood has total assets of \$1.1 billion and total deposits of \$959.5 million as of March 31, 2021. Richwood accounted for 100.0% of the holding company's consolidated assets. On December 8, 2018, Richwood acquired Home City Federal Savings Bank of Springfield (Home City), which was headquartered and operated two full-service branches in Springfield, Ohio. In addition to the main office, Richwood has seven branches; and all locations have cash-only ATMs. There have been no branch closings since the previous CRA evaluation. As a full-service retail bank, Richwood offers traditional bank products such as; deposit and checking accounts, commercial, residential real estate, agricultural,

and consumer loans.

The following table displays the loan portfolio composition as of March 31, 2021. Based on lending volume, loans secured by non-farm non-residential real estate makes up most of Richwood’s originations, followed by one-to-four family residential real estate loans.

Composition of Loan Portfolio as of March 31, 2021		
Loan Type		%
Construction and Land Development	26,036	4.3
Farmland	93,240	15.4
1-4 Family Residential Real Estate	162,613	26.8
Multifamily Residential Real Estate	23,613	3.9
Non-Farm Non-Residential Real Estate	182,045	30.1
Agricultural	21,455	3.5
Commercial and Industrial	89,139	14.7
Consumer	3,674	0.6
Other	3,853	0.6
Gross Loans	605,668	100.0
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

Richwood’s investment portfolio as of March 31, 2021, was \$393.2 million, which represented 37.3% of total assets. U.S. treasury and agency securities accounted for 53.6% of total investments, while municipal securities and interest-bearing bank balances comprised 23.0% and 14.0% of investments, respectively. The remaining 9.4% of investments consisted of federal funds sold and all other securities.

There are no known legal, financial or other factors impending Richwood’s ability to help meet the credit needs of its communities.

Richwood was rated “Satisfactory” under the CRA at its previous evaluation conducted March 20, 2017. The lending and community development tests were each rated “Satisfactory.”

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Richwood’s overall CRA performance is rated “Satisfactory.” Details are provided below, including facts, data, and analyses used to form conclusions regarding the lending and community development test performance ratings.

LENDING TEST

Richwood’s performance relative to the lending test is rated “Satisfactory” based on Richwood’s loan-to-deposit ratio, AA concentration, and borrower and geographic distribution.

For the lending test analysis, lending performance in low-, moderate-, middle-, and upper-income census tracts and to low-, moderate-, middle-, and upper-income borrowers was considered for each product; however, comments for activity in middle- and upper-income tracts and to middle- and upper-income borrowers are only included when they impacted the outcome of the analyses. Details of Richwood’s lending and information regarding lending by the aggregate of all lenders can be found in Appendix C.

Net Loan-to-Deposit Ratio

A financial institution’s net loan-to-deposit (NLTD) ratio is evaluated to determine the reasonableness of lending considering performance context, such as Richwood’s capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AA since the previous evaluation in comparison to similarly situated FDIC-insured institutions (custom peer group). The custom peer group was selected based on asset size, market share, and the area where they are located.

Loan-to-Deposit Ratios						
The Richwood Banking Company, Inc., Richwood, Ohio				Merchants National Bank, Hillsboro, Ohio	The Union Bank Company, Columbus Grove, Ohio	Custom Peer Ratio
As of Date	Net Loans \$(000s)	Total Deposits \$(000s)	Bank Ratio	Peer 1 Ratio	Peer 2 Ratio	Custom Peer Ratio
March 31, 2021	598,105	959,500	62.3	83.3	72.4	77.9
December 31, 2020	589,415	794,131	74.2	88.2	76.5	82.4
September 30, 2020	607,496	737,090	82.4	91.2	84.4	87.8
June 30, 2020	593,477	707,016	83.9	91.1	82.4	86.8
March 31, 2020	530,297	640,288	82.8	93.3	80.5	86.9
December 31, 2019	508,898	634,983	80.1	98.9	83.0	91.0
September 30, 2019	500,874	637,531	78.6	99.3	83.0	91.1
June 30, 2019	500,503	632,528	79.1	97.0	83.7	90.3
March 31, 2019	486,126	635,710	76.5	93.9	82.7	88.3
December 31, 2018	476,362	609,466	78.2	96.1	84.5	90.3
September 30, 2018	325,908	475,019	68.6	98.4	83.5	90.9
June 30, 2018	306,716	472,839	64.9	96.0	84.3	90.2
March 31, 2018	304,088	466,118	65.2	94.0	80.8	87.4
December 31, 2017	295,760	453,194	65.3	99.0	79.7	89.4
September 30, 2017	280,708	454,228	61.8	97.3	77.4	87.3
June 30, 2017	266,405	457,334	58.3	95.0	71.1	83.0
March 31, 2017	255,303	452,492	56.4	86.6	70.9	78.8
December 31, 2016	250,055	408,374	61.2	91.2	71.3	81.2
Quarterly Loan-to-Deposit Ratio Average Since the Previous Evaluation			71.1	93.9	79.6	86.7

Richwood’s NLTD ratio is considered reasonable. During this period, the bank’s NLTD ratio averaged 71.1%, which was below the custom peer group average of 86.7%. Bank management indicated its lower LTD ratio compared to peer can be attributed to Richwood’s significant amount of municipal and restricted deposits that are not available to be leveraged for lending

purposes. However, Richwood’s net loans and total deposits increased by 139.0% and 135.0%, respectively because of the Home City merger.

Assessment Area Concentration

Richwood’s HMDA lending in 2016-2017 was analyzed to determine the volume of lending inside and outside the bank’s AA. Of Richwood’s total HMDA lending, 78.2%, by volume and 77.3% of total dollar amount were made inside the AA.

Lending Inside and Outside the Assessment Areas – 2016-2017								
Loan Type	Inside				Outside			
	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%
Home Improvement	17	94.4	1,719	93.3	1	5.6	124	6.7
Home Purchase - Conventional	95	73.1	15,780	73.2	35	26.9	5,776	26.8
Multi-Family Housing	1	100.0	374	100	0	0.0	0	0.0
Refinancing	66	82.5	10,743	81.1	14	17.5	2,497	18.9
Total HMDA related	179	78.2	28,616	77.3	50	21.8	8,397	22.7
Total Loans	179	78.2	28,616	77.3	50	21.8	8,397	22.7

Note: Percentages may not total 100.0 percent due to rounding.

For the lending period of 2018-2020; Richwood’s consumer, HMDA, home equity, small business, and small farm lending was analyzed to determine the volume of lending inside and outside the AAs. Of Richwood’s total lending, 70.5%, by volume and 65.8% of total dollar amount were made inside the AAs. Richwood opted to file a combined HMDA LAR in 2018 that contained loan applications from Richwood along with loan applications received by Home City before the merger date; because Richwood and Home City operated in different markets, many of Home City’s HMDA loans were made outside Richwood’s delineated AA prior to the acquisition. Richwood also experienced a substantial increase in HMDA loans between 2019 and 2020 due to originating a number of refinance loans due to lower interest rates.

Lending Inside and Outside the Assessment Areas – 2018-2020								
Loan Type	Inside				Outside			
	#	%	\$(000)	%	#	%	\$(000)	%
Motor Vehicle	49	81.7	713	77.6	11	18.3	206	22.4
Other - Secured	57	87.7	1,821	92.0	8	12.3	159	8.0
Other – Unsecured	37	86.0	385	92.9	6	14.0	29	7.1
Total Consumer related	143	85.1	2,919	88.1	25	14.9	395	11.9
Home Improvement	19	63.3	1,268	68.7	11	36.7	577	31.3
Home Purchase - Conventional	254	50.2	42,499	54.4	252	49.8	35,587	45.6
Multi-Family Housing	21	40.4	15,606	39.8	31	59.6	23,572	60.2
Other Purpose Closed-End	29	61.7	2,346	69.7	18	38.3	1,020	30.3
Refinancing	398	76.2	72,248	73.2	124	23.8	26,438	26.8
Total HMDA related	721	62.3	133,967	60.6	436	37.7	87,194	39.4
Home Equity	65	90.3	7,000	87.9	7	9.7	963	12.1
Total Non-HMDA Residential related	65	90.3	7,000	87.9	7	9.7	963	12.1
Small Business	1,429	70.8	115,084	61.4	588	29.2	72,455	38.6
Total Small Business related	1,429	70.8	115,084	61.4	588	29.2	72,455	38.6
Small Farm	222	91.4	55,108	96.2	21	8.6	2,200	3.8
Total Small Farm related	222	91.4	55,108	96.2	21	8.6	2,200	3.8
Total Loans	2,580	70.5	314,079	65.8	1,077	29.5	163,206	34.2
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

Therefore, a majority of Richwood’s loans by both volume and dollar amount were made inside its AAs.

Lending to Borrowers of Different Income Levels and to Businesses and Farms of Different Sizes

This performance criterion evaluates Richwood’s lending to borrowers of different income levels and businesses and farms of different revenue sizes. Richwood’s lending has an overall reasonable distribution among individuals of different income levels and businesses and farms of different sizes.

From April to December 2020, Richwood originated 1,676 PPP loans totaling \$100.4 million in middle- and upper-income tracts, of which 1,203 (71.8%) totaling \$78.8 million (78.5%) were made inside the bank’s AAs and evaluated based on the borrower and geographic income distribution for each AA. However, banks were not required to collect revenue data for PPP loans, since the intent of the PPP is to assist small businesses; therefore, these unique circumstances affecting borrowers and banks resulting from the COVID-19 emergency will be considered in this evaluation. As a result, the borrower distribution performance to businesses of different sizes in 2020 will not receive much weight, since gross annual revenue information was not available for a large percentage of Richwood’s small business loans.

Geographic Distribution of Loans

This performance criterion evaluates Richwood's distribution of lending within its AAs by income level of census tracts with consideration given to the dispersion of loans throughout the AAs. Richwood's overall geographic distribution of loans reflects an excellent dispersion and a moderate level of lending gaps throughout the AAs.

Because Richwood opted to include its PPP loans in amounts of \$1.0 million or less that are in LMI tracts for consideration under the community development test, the geographic distribution largely skewed towards the middle- and upper-income tracts, this will be considered in this evaluation.

Richwood deferred loan payments to 88 small businesses and 62 consumers impacted by the COVID-19 emergency, of which 17 (11.0%) deferrals were made to small businesses and consumers in LMI tracts. These deferrals are considered responsive to credit needs of LMI geographies.

Response to Complaints

Neither Richwood nor this Reserve Bank has received any CRA-related complaints since the previous examination.

COMMUNITY DEVELOPMENT TEST

Richwood's performance relative to the community development test is rated "Satisfactory." Richwood's community development performance demonstrates adequate responsiveness to community development needs of its AAs through community development loans, qualified investments, and community development services, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AAs.

Although Richwood made a large amount of PPP loans in LMI geographies throughout its AAs and qualified investments related to affordable housing in Nonmetropolitan Ohio, community development activities in the Columbus and Springfield AAs were more limited in addressing community development needs. Community contacts indicated the critical need for all aspects of affordable housing and opportunities for financial institutions to provide support for affordable housing and economic/workforce development initiatives, and financial literacy training. Given the bank's market presence in the Columbus and Springfield AAs and the availability of community development opportunities in these AAs, Richwood has the capacity to engage in a wider range of community development activities.

Community Development Lending

During the evaluation period, all of Richwood's community development loans were PPP loans made in response to the COVID-19 emergency; from April to December 2020 Richwood originated 268 PPP loans totaling \$17.1 million to small businesses in LMI geographies within its delineated CRA footprint.² These loans helped to stabilize small business operations and retain workforce in LMI communities impacted by the pandemic. Refer to the respective Conclusions with Respect to Performance Tests sections of this evaluation for more details regarding these community development loans.

Because Richwood was responsive to community development needs and opportunities in its AAs during the evaluation period, consideration was given to a community development loan within a broader regional area outside the bank's delineated AAs. This loan totaling approximately \$1.4 million helped provide financing for site improvements for 58 units of affordable housing in Stark County. This project has received funding in part through the Low-Income Housing Tax Credit (LIHTC) program.

Community Development Investments

During the evaluation period, Richwood obtained three new investments that benefited Nonmetropolitan Ohio worth approximately \$1.3 million. These investments include a \$1.0 million LIHTC to help finance the new construction of 44 units of affordable housing and eight subsidized units for LMI persons with disabilities in Bellefontaine, Ohio (Logan County). This is a complex investment, requiring knowledge and time commitment to properly manage. Nonmetropolitan Ohio also benefited from two new mortgage-backed securities investments totaling \$257,400, that support 30 units of affordable housing in Marion and Union counties.

Because Richwood was responsive to community development needs and opportunities in the Columbus AA during the evaluation period, consideration was given to two new and two prior period mortgage-backed securities investments worth approximately \$3.8 million within a broader regional area in the Columbus MSA.

Richwood also made 80 qualified donations totaling \$176,602 during the evaluation period, of which 64 (80.0%) qualified donations totaling \$103,554 (58.6%) were made through Richwood's full-service coffee bar that awards donations to non-profits with a high-end coffee drink. Most of the contributions supported organizations that provide a multitude of community services targeted to LMI individuals and families (including but not limited to food pantries, volunteer tax preparation, legal services, scholarships, and fundraising), affordable housing, economic

²Richwood originated 40 PPP loans (\$1.9 million) to small businesses in LMI geographies in a broader statewide area that does not include the bank's AAs and 52 PPP loans (\$3.8 million) in a broader regional area in the Columbus and Nonmetropolitan Ohio AAs.

development for small farms, and a hospital that serves a moderate-income area.

Community Development Services

During the evaluation period, 12 employees delivered 41 services totaling approximately 4,554 hours of community development services to 23 different organizations that provide services throughout the AAs. Employees provided leadership, financial, and/or technical expertise to organizations that promote or facilitate community services targeted to LMI individuals and families, affordable housing, and economic development. Employees also provided financial literacy education. Community development services included the following:

Board and Committee Memberships – Richwood’s officers and managers provided financial expertise through their involvement with community development organizations throughout the assessment areas by serving as board directors, loan committee members, or treasurers.

Technical Assistance – Employees provided technical assistance which included fund raising, budgeting, volunteer income tax assistance, loan application requests/approvals, and SBA funding.

Financial Education – Richwood uses the Banzai’s courses for teaching financial literacy and provides all associated classroom materials and in-person instruction. Financial literacy topics include but are not limited to financial responsibility and decision making, planning and money management, informed consumer decision making, and credit and debt management tools.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Compliance with the substantive provisions of antidiscrimination and other consumer protection laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act, was considered as part of this CRA evaluation. No evidence of a pattern or practice of discrimination on a prohibited basis or of other illegal credit practices inconsistent with helping to meet community credit needs was identified.

METROPOLITAN AREA
(Full-scope Review)

DESCRIPTION OF INSTITUTION’S OPERATIONS IN COLUMBUS OH MSA #18140

The Columbus AA consists of portions of Delaware and Madison counties, and the entirety of Union County and excludes Fairfield, Franklin, Hocking, Licking, Morrow, Perry, and Pickaway counties. This AA remains unchanged since the previous evaluation. Due to the use of 2015 U.S. Census American Community Survey (ACS) data instead of 2010 U.S. Census data in 2017, the AA was comprised of the following income-tract designations during the evaluation period.

Census Tract Designations		
Assessment Area: Columbus, OH MSA #18140		
Income Tract Level	2016	2017-2020
Low	0	0
Moderate	2	3
Middle	15	21
Upper	17	10
Total	34	34

The AA gained one moderate- and six middle-income tracts and lost seven upper-income tracts between 2016 and 2017. There were no changes to low-income tracts.

Richwood operates four branch offices with cash-only ATMs in Columbus AA. The bank’s main office in Richwood (Union County) and a branch in Marysville (Union County) are in moderate-income tracts. Richwood also has a branch in Delaware (Delaware County) and a branch in Plain City (Union County) in middle-income tracts. All four branches have drive-thrus and offer weekend hours. The Marysville branch also offers extended service hours. While Richwood relocated its Marysville branch in 2017, the bank did not open or close any branches in this AA during the evaluation period.

As of June 30, 2020, the Federal Deposit Insurance Corporations’ (FDIC) Deposit Market Share Report, ranks Richwood sixth among 22 institutions operating in the AA with an 8.2% market share. JPMorgan Chase Bank, National Association holds a 25.9% market share and The Huntington National Bank holds an 18.8% market share. This leaves a 55.3% market share available to the remaining 20 financial institutions, including Richwood and several large financial institutions. Deposits in this AA account for 70.9% of Richwood’s total deposits. By comparison, Richwood ranks 16th among 54 institutions operating in the Columbus MSA with a 0.6% market share.

The 2020 HMDA Peer Market data indicates that Richwood ranks 18th out of 362 HMDA reporters in the AA and originated 243 loans. By comparison, first ranked Huntington National Bank originated 1,371 loans, second ranked Union Savings Bank originated 990 loans, and third ranked

JPMorgan Chase Bank, National Association originated 873 loans.

Community Contacts

Interviews were conducted with two community contacts to provide additional information regarding the AA. The first contact was with a representative from an affordable housing agency in Delaware County. The contact stated the community has experienced significant population growth from people relocating from Franklin County due to rising housing costs and Delaware County's proximity to Columbus. While there is available housing in Delaware County, the price for newly constructed homes is rising; potentially making these homes out of reach for many first-time homebuyers, particularly LMI homebuyers. In July 2021, Delaware County home prices were up 10.7% compared to 2020, selling for a median price of \$415,000. Also, affordable housing options (via the Section 8 Housing Choice Voucher Rental Assistance Program) are concentrated in certain areas in the county, thereby limiting location options. The contact indicated that affordable housing is a critical need in the county, and there is ample opportunity for local financial institutions to provide financial education for potential first-time homebuyers and offer solutions to address the lack of affordable housing throughout the county.

The second contact was with a representative from an economic development agency. According to the contact, economic conditions in Central Ohio are very good; and Delaware County is one of the fastest-growing counties in the country. Many businesses are migrating to Delaware County to reduce costs and tax burdens, while still being near Columbus, the state capital, and state government. The contact indicated there is a need for access to capital through microloans, commercial lending, and investment capital for businesses, (especially small businesses), as most entrepreneurs cannot start new businesses or expand existing companies without access to capital. The contact stated that while Delaware County is experiencing significant population growth, it is also experiencing housing affordability challenges, primarily because the housing production has not kept pace with the county's growth. The contact indicated that more families may be at risk for having to choose between paying rent or other vital expenses due to escalating housing costs. According to the contact, even with the area's population growth, Central Ohio is experiencing a shortage of skilled workers needed to keep pace with industry demands, and there is a critical need across public, private, and government sectors for education and training systems to address workforce development and the evolving demands of labor markets.

Population Characteristics

Population Change Assessment Area: Columbus, OH MSA #18140			
Area	2015 Population	2019 Population	Percent Change
Delaware County	185,433	209,177	12.8
Madison County	43,456	44,731	2.9
Union County	53,470	58,988	10.3
Columbus, OH MSA	1,972,375	2,122,271	7.6
Ohio	11,575,977	11,689,100	1.0
Source: 2011-2015 U.S. Census Bureau: American Community Survey U.S. Census Bureau Annual Population Estimates			

- According to 2015 U.S. Census data, the AA's population was 169,075.
- From 2015 through 2019 Delaware and Union counties experienced growth rates of 12.8% and 10.3%, respectively, compared to the MSA with a growth rate of 7.6% and Ohio with a growth rate of only 1.0%.
- Over the next 20 years population in Delaware, Madison, and Union counties is projected to increase by nearly 30.0%, indicating there are opportunities for investments in housing development and infrastructure in this growing region.
- 73.4% of AA population was 18 years of age or older, the legal age to enter into a contract.
- 11.5% of the population was age 65 and over, compared to 15.1% in Ohio; indicating the AA has a larger working- and consumer-age population and increased economic activity. However, a community contact indicated that even with the area's population growth, there is a shortage of skilled workers needed to keep pace with industry demands.
- Only 7.9% of the population resides in the AA's moderate-income tracts.
- The largest city in the AA is Delaware in Delaware County with a population of 41,283; compared to Marysville, the largest city in Union County, with a population of 24,667; and London, the largest city in Madison County, with a population of 10,328.

Income Characteristics

Borrower Income Levels Assessment Area: Columbus, OH MSA #18140										
FFIEC Estimated Median Family Income			Low		Moderate		Middle		Upper	
Year	\$	% Change	0	-	50%	-	80%	-	120%	& above
2016	\$69,100		0	-	\$34,549	\$34,550	\$55,279	\$55,280	\$82,919	\$82,920 & above
2017	\$73,900	6.9%	0	-	\$36,949	\$36,950	\$59,119	\$59,120	\$88,679	\$88,680 & above
2018	\$76,000	2.8%	0	-	\$37,999	\$38,000	\$60,799	\$60,800	\$91,199	\$91,200 & above
2019	\$77,900	2.5%	0	-	\$38,949	\$38,950	\$62,319	\$62,320	\$93,479	\$93,480 & above
2020	\$84,600	8.6%	0	-	\$42,299	\$42,300	\$67,679	\$67,680	\$101,519	\$101,520 & above
Source: 2016-2020 FFIEC Census Data										

- During the evaluation period, the median family income (MFI) in the MSA increased each year; with an overall increase of 22.4% during this span.

- According to 2018 U.S. Census data estimates, Delaware County had the highest MFI in Ohio at \$122,435; Union County ranked fourth at \$94,084 and Madison County ranked 17th at \$74,366.

Poverty Rates			
Assessment Area: Columbus, OH MSA #18140			
Area	2017	2018	2019
Delaware County	4.8	4.1	4.8
Madison County	9.6	10.7	9.6
Union County	5.2	5.0	5.4
Ohio	13.9	13.8	13.0
United States	13.4	13.1	12.3

Source: U.S. Census Bureau Small Area Income and Poverty Estimates Program

- Overall, poverty rates in the AA were significantly below the poverty line across Ohio and the nation in 2017–2019.
- Of the 44,573 families in the AA, 29.5% are designated as LMI, with 5.2% living below the poverty line; compared to 39.4% of families in the MSA designated as LMI, with 10.5% living below the poverty line.
- Of the 59,765 households in the AA, 7.1% are below the poverty line and 2.1% receive public assistance.

Housing Characteristics

Housing Cost Change										
Assessment Area: Columbus, Ohio MSA #18140										
Area	Median Housing Value					Median Gross Rent				
	2010	2015	% Change between 2010 and 2015	2019	% Change between 2015 and 2019	2010	2015	% Change between 2010 and 2015	2019	% Change between 2015 and 2019
Delaware County	\$252,700	\$256,800	1.6	\$308,800	20.2	\$781	\$953	22.0	\$1,069	12.2
Madison County	\$146,800	\$149,200	1.6	166,500	11.6	\$660	\$734	11.2	\$858	16.9
Union County	\$174,800	\$171,200	2.1	203,800	19.0	\$762	\$805	5.6	\$982	22.0
Columbus, OH MSA	\$161,176	\$159,061	1.3			\$749	\$832	11.1		
Ohio	\$136,400	\$129,900	4.8	\$145,700	12.2	\$678	\$730	7.7	\$808	10.7

Source: 2006-2010 U.S. Census Bureau: American Community Survey
2011-2015 U.S. Census Bureau: American Community Survey
2015-2019 U.S. Census Bureau: American Community Survey

- While median housing values decreased slightly from 2010-2015, median housing values increased significantly from 2015-2019. However, housing become more affordable across

the AA, primarily due to the increasing MFI (22.4% increase) during the evaluation period. The affordability ratio³ went from 35.2 in 2010 to 37.6 in 2015 to 39.3 in 2019.

- However, a community contact stated that in July 2021, Delaware County home prices were up 10.7% compared to last year, selling for a median price of \$415,000.
- Conversely median gross rents across the AA increased by as much as 22.0% from 2015-2019. The notable rise in median gross rents demonstrates the need for more affordable housing, considering the larger percentage of LMI families dependent upon the rental market. Community contacts identified the lack of affordable housing as a critical need in the AA.
- There are 63,234 housing units in the AA and 73.8% are owner occupied, 20.7% are rental, and 5.5% are vacant, compared to 5,967 (9.4%) of housing units in moderate-income tracts of which 53.5% are owner-occupied, 39.1% are rental, and 7.3% are vacant.
- With 26.2% of housing units being either rental or vacant, there appears to be opportunities to originate home mortgage loans in the AA, including in moderate-income areas where over half the housing units are owner-occupied.
- The median age of housing stock in the AA is 32 years old, and 16.3% of housing units were built prior to 1950 (over 70 years old); the age of the housing stock may indicate a modest need for home improvement lending across the AA.
- Additionally, the median age of housing stock in moderate-income tracts is 46 years old; the age of the housing stock in these tracts, may indicate a need for refinance or home improvement loans to remove lead-based paint which was commonly used on houses and apartments built before 1978.⁴

Housing Cost Burden						
Assessment Area: Columbus, OH MSA #18140						
Area	Cost Burden - Owners			Cost Burden - Renters		
	Low Income	Moderate Income	All Owners	Low Income	Moderate Income	All Renters
Assessment Area	70%	46%	21%	73%	32%	37%
Delaware County	72%	51%	21%	81%	43%	38%
Madison County	65%	35%	19%	61%	17%	31%
Union County	68%	43%	24%	70%	15%	37%
Columbus, OH MSA	67%	41%	21%	77%	31%	42%
Ohio	64%	35%	20%	74%	32%	43%

Cost Burden is housing cost that equals 30 percent or more of household income
Source: 2006-2010 U.S. Census Bureau: American Community Survey
2011-2015 U.S. Census Bureau: American Community Survey

³The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered.

⁴ Ohio Department of Health/Know Our Programs/Childhood Lead Poisoning

- Nearly 70.0% of low-income homeowners and 73.0% of low-income renters are cost-burdened, compared to 46.0% of moderate-income homeowners and 32.0% of moderate-income renters across the AA.
- 21.0% of homeowners across the AA are cost-burdened, which is comparable to homeowners across the MSA and Ohio.
- 37.0% of renters across the AA are cost-burdened, which is less than renters across the MSA and Ohio.
- However, the data shows that cost burden disproportionately affects renter-occupied households.
- Based on increasing home values and rental rates; LMI individuals, particularly those who are cost-burdened, may have a difficult time saving enough to make a sufficient down payment or affording increasing rents.

Building by Number of Units					
Assessment Area: Columbus, OH MSA #18140					
Area	2018	2019	% Change between 2018 and 2019	2020	% Change between 2019 and 2020
Delaware County	1,629	1,927	18.3	1,902	1.3
Madison County	135	163	20.7	145	11.0
Union County	863	567	34.3	854	50.6
Columbus, OH MSA	9,440	8,090	14.3	12,358	52.8
Ohio	24,221	23,047	4.8	29,686	28.8
United States	1,328,827	1,386,048	4.3	1,471,141	6.1

Source: U.S. Census Bureau Building Permits Survey

- Building permits are a leading indicator of future activity in the construction sector. From 2018-2020, building permits in the AA increased, except in Union County. However, the overall percentage of building permits in AA was below the percentage of building permits in the MSA and Ohio.
- The overall increase of building permits could still indicate an increasing demand for home purchase loans in the AA. However, a community contact indicated that housing production has not kept pace with the county's population growth, as a result available housing is becoming less affordable.

Labor, Employment and Economic Characteristics

Unemployment Rates					
Assessment Area: Columbus, OH #44220					
Area	2016	2017	2018	2019	2020
Assessment Area	3.7%	3.6%	3.5%	3.2%	5.5%
Delaware County	3.6%	3.5%	3.4%	3.2%	5.3%
Madison County	4.0%	3.9%	3.8%	3.5%	5.9%
Union County	3.8%	3.7%	3.5%	3.2%	5.8%
Columbus, OH MSA	4.2%	4.1%	3.9%	3.6%	7.0%
Ohio	5.0%	5.0%	4.5%	4.2%	8.1%
<i>Source: Bureau of Labor Statistics: Local Area Unemployment Statistics</i>					

- While 2016-2019 unemployment rates decreased across the AA, 2020 unemployment rates increased by as much as 2.6 percentage points in response to the COVID-19 pandemic.
- Unemployment rates were higher in the MSA and Ohio compared to the AA during this period.
- According to Ohio Office of Research:⁵
 - Delaware County is most impacted by the industries of professional and business services; trade, transportation, and utilities; education and health services; leisure and hospitality; local government; and manufacturing. Major employers include Delaware City Schools, DHL, JPMorgan Chase, Kroger, Mettler-Toledo International, Ohio Wesleyan University, Ohio Health/Grandy Memorial Hospital, Optum, Olentangy Local Schools, PPG Industries, Showa Corporation, State of Ohio, and Vertiv Company. The average weekly wage for the private sector is \$1,068, which indicates that employed persons could afford the median rent of \$1,069.
 - Madison County is most impacted by the industries of professional and business services; trade, transportation, and utilities; manufacturing; local government; professional and business services; state government; leisure and hospitality; and education and health services. Major employers include Battelle Memorial Institute, Jefferson Industries, Keihin Thermal Technology, Kellogg Company, London City Schools, Madison Family Health, Nissen Chemitec, Restoration Hardware, Stanley Electric US Company, Staples, Inc., State of Ohio, and Target Corporation. The average weekly wage for the private sector is \$800, which indicates that employed persons could afford the median rent of \$858.

⁵ www.development.oh.gov/reports_countytrends_map

- Union County is most impacted by the industries of professional and business services; manufacturing; trade, transportation, and utilities; local government; leisure and hospitality; and education and health services. Major employers include Continental, Honda Motor Company, Marysville Exempted Village Schools, Memorial Hospital of Union County, Nestle R&D, Parker Hannifin Corporation, Scotts Miracle-Gro Company, State of Ohio, Union County Government, and Wal-Mart Stores. The average weekly wage for the private sector is \$1,140, which indicates that employed persons could afford the median rent of \$982.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN COLUMBUS OH MSA #18140

LENDING TEST

The lending test performance in Columbus AA is reasonable. Details of Richwood's lending can be found in the tables in Appendix C.

Lending to Borrowers of Different Income Levels and Businesses and Farms of Different Sizes

Richwood's lending penetration among borrowers of different income (including LMI) levels and to businesses and farms of different sizes in the Columbus AA is considered reasonable.

The borrower distribution performance to businesses of different sizes in 2020 will not receive much weight, since gross annual revenue information was not available for a large percentage of Richwood's small business loans. Most of these loans were PPP loans, and banks were not required to collect revenue data for these loans.

Small Business Lending

Richwood made 852 small business loans totaling \$69.2 million to businesses of different sizes in 2020, of which 685 (80.4%) loans totaling \$36.8 million were made to businesses with unknown gross annual revenues. Of the total small business loans, 78.5% are PPP loans.

Richwood made 82.3% of small dollar loans in amounts of \$100,000 or less. A community contact identified the need for access to capital through microloans, especially for small businesses; because most entrepreneurs cannot start new businesses or grow their existing companies without access to capital. Richwood's willingness to lend in smaller amounts exhibits responsiveness to credit needs of small businesses, particularly small businesses impacted by the COVID-19 emergency.

HMDA Lending

During the evaluation period Richwood made 556 HMDA loans totaling \$109.9 million, including 289 refinance and 213 home purchase loans totaling \$54.4 million and \$39.4 million, respectively. Richwood's performance was compared to the percentage of families by family income (proxy) and the aggregate of all lenders. Richwood's borrower distribution of HMDA loans is excellent.

Refinance Lending

Richwood made 180 refinance loans totaling \$36.1 million in 2020. Richwood also made five (2.8%) refinance loans to borrowers with unknown-income designations. Richwood originated 11 (6.1%) refinance loans to low-income borrowers, which was well below the percentage of families at 14.0% and substantially exceeded the aggregate of all lenders at 2.5%. While lending was below proxy, Richwood outperformed the aggregate of all lenders. Richwood originated 49 (27.2%) refinance loans to moderate-income borrowers, which exceeded the percentage of families at 15.5% and substantially exceeded the aggregate of all lenders at 8.8%.

Richwood made 38 refinance loans totaling \$6.2 million in 2019. Richwood also made two (5.3%) refinance loans to borrowers with unknown-income designations. Richwood originated eight (21.1%) refinance loans to low-income borrowers, which substantially exceeded the percentage of families at 14.0% and the aggregate of all lenders at 4.0%. Richwood originated eight (21.1%) refinance loans to moderate-income borrowers, which substantially exceeded the percentage of families at 15.5% and the aggregate of all lenders at 11.2%.

Richwood made 30 refinance loans totaling \$5.7 million in 2016. Richwood also made three (10.0%) refinance loans to borrowers with unknown-income designations. Richwood originated one (3.3%) refinance loan to low-income borrowers, which was substantially below the percentage of families at 13.4% and below the aggregate of all lenders at 3.7%. Richwood originated six (20.0%) refinance loans to moderate-income borrowers, which exceeded the percentage of families at 13.4% and the aggregate of all lenders at 8.3%.

The borrower distribution of refinance loans is excellent to LMI borrowers; particularly since in 2020 and 2019, the years with the most loans, Richwood's refinance lending performance consistently exceeded the percentage of families and the aggregate of all lenders.

Home Purchase Lending

Richwood made 49 home purchase loans totaling \$11.1 million in 2020. Richwood also made nine (18.4%) home purchase loans to borrowers with unknown-income designations. Richwood originated four (8.2%) home purchase loans to low-income borrowers, which was below the percentage of families at 14.0% but substantially exceeded the aggregate of all lenders at 3.8%. Richwood originated 11 (22.4%) home purchase loans to moderate-income borrowers, which

exceeded the percentage of families at 15.5% and aggregate of all lenders at 14.6%.

Richwood made 46 home purchase loans totaling \$9.2 million in 2019. Richwood originated four (8.7%) home purchase loans to low-income borrowers, which was below the percentage of families at 14.0% and substantially exceeded the aggregate of all lenders at 3.2%. Richwood originated 13 (28.3%) home purchase loans to moderate-income borrowers, which exceeded the percentage of families at 15.5% and the aggregate of all lenders at 12.9%.

Richwood made 42 home purchase loans totaling \$6.1 million in 2018. Richwood also made seven (16.7%) home purchase loans to borrowers with unknown-income designations. Richwood originated three (7.1%) home purchase loans to low-income borrowers, which was below the percentage of families at 14.0% and substantially exceeded the aggregate of all lenders at 2.8%. Richwood originated 10 (23.8%) home purchase loans to moderate-income borrowers, which exceeded the percentage of families at 15.5% and the aggregate of all lenders at 13.3%.

Richwood made 51 home purchase loans totaling \$9.3 million in 2017. Richwood also made two (3.9%) home purchase loans to borrowers with unknown-income designations. Richwood originated six (11.8%) home purchase loans to low-income borrowers, which was below the percentage of families at 14.0% but substantially exceeded the aggregate of all lenders at 3.5%. Richwood originated seven (13.7%) home purchase loans to moderate-income borrowers, which was below the percentage of families at 15.5% and exceeded the aggregate of all lenders at 13.0%.

Richwood made 25 home purchase loans totaling \$3.7 million in 2016. Richwood also made one (4.0%) home purchase loan to borrowers with unknown-income designations. Richwood originated five (20.0%) home purchase loans to low-income borrowers, which exceeded the percentage of families at 13.4.0% but substantially exceeded the aggregate of all lenders at 3.0%. Richwood originated five (20.0%) home purchase loans to moderate-income borrowers, which exceeded the percentage of families at 13.4% and the aggregate of all lenders at 12.7%.

The borrower distribution of home purchase lending is excellent to LMI borrowers, particularly since home purchase lending performance mostly exceeded the percentage of families and the aggregate of all lenders.

Small Farm Lending

Richwood made 148 small farm loans totaling \$32.6 million to farms of different sizes in 2020. Richwood made 83 (56.1%) loans totaling \$17.6 million to farms with revenues of \$1.0 million or less, which was below the percentage of small farms in the AA at 98.6%. Of the total small farm loans, 27.0% are PPP loans; and 42 (28.4%) loans totaling \$1.4 million were made to farms with unknown gross annual revenues. PPP loans did not impact the ability to conduct a meaningful analysis. Given Richwood's performance compared to proxy, the borrower distribution of small farm loans is reasonable.

Richwood made 64.9% of small dollar loans in amounts of \$100,000 or less. This indicates the bank's willingness to lend in smaller amounts that tend to represent amounts typically requested by small farms, particularly small farms impacted by the COVID-19 emergency.

Consumer Lending

Richwood originated a total of 97 consumer loans totaling \$1.3 million. Richwood's performance was compared to the percentage of households by household income (proxy). Overall Richwood's borrower distribution of consumer loans is reasonable.

Motor Vehicle Lending

Richwood made 37 motor vehicle loans totaling \$582,000 in 2020. Richwood also made 12 (32.4%) motor vehicle loans to borrowers with unknown-income designations. Richwood originated five (13.5%) motor vehicle loans to low-income borrowers which was below the percentage of households at 15.9%. Richwood originated nine (24.3%) motor vehicle loans to moderate-income borrowers which exceeded the percentage of households at 14.8%.

Borrower distribution of motor vehicle lending is reasonable to low-income borrowers and excellent to moderate-income borrowers, particularly since access to transportation is essential for improving upward social mobility for lower-income individuals and communities.

Other Secured Lending

Richwood made 35 other secured loans totaling \$513,000 in 2020. Richwood also made 13 (37.1%) other secured loans to borrowers with unknown-income designations. Richwood originated five (14.3%) other secured loans to low-income borrowers which was below the percentage of households at 15.9%. Richwood originated seven (20.0%) other secured loans to moderate-income borrowers which exceeded the percentage of households at 14.8%.

Borrower distribution of other secured lending is reasonable to low-income borrowers and excellent to moderate-income borrowers.

Other Unsecured Lending

Richwood made 25 other unsecured loans totaling \$191,000 in 2020. Richwood also made 13 (52.0%) other unsecured loans to borrowers with unknown-income designations. Richwood originated five (20%) other unsecured loans to low-income borrowers which exceeded the percentage of households at 15.9%. Richwood originated five (20.0%) other unsecured loans to moderate-income borrowers which exceeded the percentage of households at 14.8%.

Borrower distribution of other unsecured lending is excellent to LMI borrowers, particularly since

access to unsecured, small dollar loans gives LMI individuals the ability to have access to smaller amounts of money to pay for items/services they could not otherwise afford at the time and potentially avoid high-cost payday lenders.

Home Equity Lending

Richwood made 41 home equity loans totaling \$5.1 million in 2020. In addition, Richwood made 11 (26.8%) home equity loans to borrowers with unknown-income designations. Richwood originated four (9.8%) home equity loans to low-income borrowers which was below the percentage of families at 14.0%. Richwood originated three (7.3%) home equity loans to moderate-income borrowers which was well below the percentage of families at 15.5%.

The borrower distribution of home equity lending is reasonable to low-income borrowers and poor to moderate-income borrowers.

Geographic Distribution of Loans

Richwood’s geographic distribution reflects an excellent dispersion of loans in the Columbus AA. Richwood has a moderate level of lending gaps.

Percentage of Lending Penetration					
Tract Income Level	2016	2017	2018	2019	2020
Moderate	50.0%	66.7%	66.7%	100.0%	100.0%
Middle	66.7%	81.0%	66.7%	66.7%	100.0%
Upper	52.9%	50.0%	40.0%	50.0%	100.0%
Total	58.8%	70.6%	58.8%	64.7%	100.0%

Small Business Lending

Richwood made 852 small business loans totaling \$69.2 million in 2020. Richwood originated 32 (3.8%) small business loans in moderate-income tracts, which was below the percentage of businesses in those tracts at 7.3%. However, since Richwood opted to include its PPP loans in LMI tracts in amounts of \$1.0 million or less for consideration under the community development test, the geographic distribution largely skewed towards the middle- and upper-income tracts. If PPP loans were excluded from the analysis, the percentage of small business loans in moderate-income tracts was 17.5%, which substantially exceeded proxy at 7.3%. Therefore, the geographic distribution of small business loans is excellent.

HMDA Lending

During the evaluation period Richwood made 556 HMDA loans totaling \$109.9 million, including 289 refinance and 213 home purchase loans totaling \$54.4 million and \$39.4 million, respectively. Richwood's performance was compared to the percentage of owner-occupied units by tract income (proxy) and the aggregate of all lenders. Richwood's geographic distribution of HMDA loans is excellent.

Refinance Lending

Richwood made 180 refinance loans totaling \$36.1 million in 2020. Richwood originated 16 (8.9%) refinance loans in moderate-income tracts, which exceeded the percentage of owner-occupied units at 6.8% and the aggregate of all lenders at 3.9%.

Richwood made 38 refinance loans totaling \$6.2 million in 2019. Richwood originated seven (18.4%) refinance loans in moderate-income tracts, which substantially exceeded the percentage of owner-occupied units at 6.8% and the aggregate of all lenders at 4.9%.

Richwood made 30 refinance loans totaling \$5.7 million in 2016. Richwood originated one (3.3%) refinance loan in moderate-income tracts, which was below the percentage of owner-occupied units at 3.5% and exceeded the aggregate of all lenders at 2.4%.

The geographic distribution of refinance lending is excellent in moderate-income tracts; particularly since in 2020 and 2019, the years with the most loans, Richwood's refinance lending performance consistently exceeded the percentage of owner-occupied units and the aggregate of all lenders.

Home Purchase Lending

Richwood made 49 home purchase loans totaling \$11.1 million in 2020. Richwood originated five (10.2%) home purchase loans in moderate-income tracts, which exceeded the percentage of owner-occupied units at 6.8% and the aggregate of all lenders at 7.0%.

Richwood made 46 home purchase loans totaling \$9.2 million in 2019. Richwood originated 10 (21.7%) home purchase loans in moderate-income tracts, which substantially exceeded the percentage of owner-occupied units at 6.8% and the aggregate of all lenders at 7.5%.

Richwood made 42 home purchase loans totaling \$6.1 million in 2018. Richwood originated five (11.9%) home purchase loans in moderate-income tracts, which exceeded the percentage of owner-occupied units at 6.8% and the aggregate of all lenders at 7.0%.

Richwood made 51 home purchase loans totaling \$9.3 million in 2017. Richwood originated 11

(21.6%) home purchase loans in moderate-income tracts, which substantially exceeded the percentage of owner-occupied units at 6.8% and the aggregate of all lenders at 6.3%.

Richwood made 25 home purchase loans totaling \$3.7 million in 2016. Richwood originated one (4.0%) home purchase loan in moderate-income tracts, which exceeded the percentage of owner-occupied units at 3.5% and was below the aggregate of all lenders at 4.2%.

The geographic distribution of home purchase lending is excellent in moderate-income tracts.

Small Farm Lending

Richwood made 148 small farm loans totaling \$32.6 million in 2020. Richwood originated 10 (6.8%) small farm loans in moderate-income tracts, which exceeded the percentage of farms in those tracts at 6.0%. Therefore, the geographic distribution of small farm loans in moderate-income tracts is excellent. If PPP loans were excluded from the analysis, the geographic distribution remains excellent.

Consumer Lending

Richwood originated a total of 97 consumer loans totaling \$1.3 million. Richwood's performance was compared to the percentage of households by tract income (proxy). Overall Richwood's geographic distribution of consumer loans is excellent.

Motor Vehicle Lending

Richwood made 37 motor vehicle loans totaling \$582,000 in 2020. Richwood originated four (10.8%) motor vehicle loans in moderate-income tracts which exceeded the percentage of households at 9.3%. The geographic distribution of motor vehicle lending in moderate-income tracts is excellent.

Other Secured Lending

Richwood made 35 other secured loans totaling \$513,000 in 2020. Richwood originated 11 (31.4%) other secured loans in moderate-income tracts which substantially exceeded the percentage of households at 9.3%. The geographic distribution of other secured lending in moderate-income tracts is excellent.

Other Unsecured Lending

Richwood made 25 other unsecured loans totaling \$191,000 in 2020. Richwood originated seven (28.0%) other unsecured loans in moderate-income tracts which substantially exceeded the percentage of households at 9.3%. The geographic distribution of other unsecured lending in

moderate-income tracts is excellent.

Home Equity Lending

Richwood made 41 home equity loans totaling \$5.1 million in 2020. Richwood originated seven (17.1%) home equity loans in moderate-income tracts which exceeded the percentage of owner-occupied units at 6.8%. The geographic distribution of home equity lending in moderate-income tracts is excellent.

COMMUNITY DEVELOPMENT TEST

Richwood's community development performance demonstrates adequate responsiveness to community development needs of the Columbus AA.

While PPP loans helped small businesses struggling to stay open amid the COVID-19 crisis, community contacts indicated there are opportunities and needs in the AA for continued access to capital for small businesses post-pandemic. Community contacts also identified a critical need for all aspects of affordable housing, workforce development, and financial literacy training for LMI first-time homebuyers. During the evaluation period, Richwood's only community development lending activity consisted of PPP loans originated in 2020. Within Richwood's delineated CRA footprint, qualified community development investments were only in the form of small dollar donations. While Richwood made a large amount of PPP loans in LMI geographies, there were opportunities to engage in more varied community development activities to meet identified needs in the community, especially considering the bank's size and market share in the AA.

Community Development Lending

Richwood originated 141 community development loans totaling \$6.8 million in the Columbus AA, which represents 40.0% of Richwood's total community development lending by dollar amount during this evaluation period. All the community development loans were PPP loans made in response to the COVID-19 crisis to help local businesses remain open and retain their workforce.

Qualified Investments

Richwood made 67 donations totaling \$163,970 to 15 organizations, which represents 92.9% of Richwood's total qualified donations by dollar amount during the evaluation period. Also, 52 (77.6%) of qualified donations totaling \$91,172 (55.6%) were made through Richwood's full-service coffee bar that awards donations to non-profits with a high-end coffee drink.

The following table shows the total number of qualified donations by purpose, number, and dollar amount.

Purpose of Qualified Donation	#	\$
Services to LMI Individuals	47	\$108,741
Revitalization/Stabilization	6	\$26,830
Affordable Housing	9	\$24,620
Economic Development	5	\$3,779
Total	67	\$163,970

Most of the contributions supported organizations that provide a multitude of community services targeted to LMI individuals and families (including but not limited to food pantries, scholarships, and fundraising). To a lesser extent, small dollar donations also supported affordable housing, economic development for small farms, and a hospital that serves a moderate-income area.

Because Richwood was responsive to community development needs and opportunities in this AA, consideration was given to two new (\$3.2 million) and two prior period (\$605,602) mortgage-backed securities investments within a broader regional area in the Columbus MSA. Generally, mortgage-backed securities are considered less responsive than more complex types of investments.

Community Development Services

Two employees provided leadership, financial, and/or technical expertise to four community organizations offering services to LMI individuals and families or promoting economic development. Community development services include 540 hours either serving on boards and/or committees and providing technical expertise or financial literacy education. For example, bank staff provided financial literacy training to LMI single-working women and homeless families and served as a member of a financial fiduciary committee to the county farm bureau.

METROPOLITAN AREA
(Full-scope Review)

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN
SPRINGFIELD OH MSA #44220**

The Springfield MSA and Richwood's delineated AA consists of the entirety of Clark County. Richwood entered this market in December 2018 with the acquisition of Home City. The AA was comprised of the following income-tract designations during the evaluation period.

Income Tract Level	2019-2020
Low	4
Moderate	14
Middle	16
Upper	10
Total	44

Richwood acquired and operates two branch offices with cash-only ATMs in the Springfield MSA. One branch is in downtown Springfield in a moderate-income tract, and the second branch is in Springfield in an upper-income tract. Both branches have drive-thrus and the latter also has weekend hours.

As of June 30, 2020, the Federal Deposit Insurance Corporations' (FDIC) Deposit Market Share Report, ranks Richwood fifth among 12 institutions operating in the MSA with an 7.1% market share. The Park National Bank holds a 30.9% market share, The Huntington National Bank holds an 17.18%, and PNC Bank, National Association holds a 15.7% market share. This leaves a 36.3% market share available to the remaining nine financial institutions, including Richwood and several large financial institutions in this competitive market. Deposits in this AA account for 18.5% of Richwood's total deposits.

The 2020 HMDA Peer Market data indicates that Richwood ranks 14th out of 237 HMDA reporters in the MSA and originated 116 loans. By comparison, first ranked Wright-Patt Credit Union originated 502 loans, second ranked The Park National Bank originated 310 loans, fifth ranked The Huntington National Bank originated 240 loans, and 16th ranked PNC Bank, National Association originated 102 loans.

Community Contacts

Interviews were conducted with two community contacts to provide additional information regarding the AA. The first contact was with a representative from an affordable housing agency. The contact stated that housing of all types is a critical priority for the community. The city's housing stock is aging, sales prices are modest, and new housing development has been limited.

The contact stated while there is a need to offer a competitive range of housing options, Springfield is experiencing a shortage of affordable rental housing units for LMI renters. There are opportunities for banks to support ongoing development projects to attract new residents, businesses, and additional housing.

The second contact was with a representative from an economic development agency. According to the contact, Springfield is experiencing economic growth with local employers Mercy Health and Wright Patterson Air Force Base (WPAFB). The contact stated the decline in the area’s working-age population could present a major challenge for continued economic growth. As the baby boomer generation leaves the workforce, there are not enough qualified, working-age people to fill positions requiring specific high-demand skills. The contact indicated there is a need for workforce development training to help attract and retain the quality workforce needed to keep Springfield’s economy growing.

Population Characteristics

Population Change			
Assessment Area: Springfield, OH MSA #18140			
Area	2015 Population	2019 Population	Percent Change
Clark County	136,827	134,083	2.0
Ohio	11,575,977	11,689,100	1.0
Source: 2011-2015 U.S. Census Bureau: American Community Survey U.S. Census Bureau Annual Population Estimates			

- From 2015 through 2019 the MSA experienced a 2.0% population decline, compared to Ohio with a growth rate of only 1.0%.
- Over the next 20 years population in the MSA is projected to decrease by at least 4.0%.
- 77.0% of AA population was 18 years of age or older, the legal age to enter into a contract.
- 17.4% of the population was age 65 and over, compared to 15.1% in Ohio; indicating the AA has a smaller working- and consumer-age population and decreased economic activity. A community contact expressed concern that the area’s shrinking working-age population could present a major challenge for continued economic growth.
- 34.4% of the population resides in the AA’s LMI tracts.
- The largest municipality in the AA is the city of Springfield, with a population of 58,877.

Income Characteristics

Borrower Income Levels														
Assessment Area: Springfield, OH MSA #44220														
FFIEC Estimated Median Family Income			Low			Moderate			Middle		Upper			
Year	\$	% Change	0	-	49.9%	50%	-	79.9%	80%	-	119.9%	120%	-	& above
2019	\$62,200		0	-	\$31,099	\$31,100	-	\$49,759	\$49,760	-	\$74,639	\$74,640	-	& above
2020	\$61,100	-1.8%	0	-	\$30,549	\$30,550	-	\$48,879	\$48,880	-	\$73,319	\$73,320	-	& above
Source: 2019-2020 FFIEC Census Data														

- While the MFI in the MSA (Clark County) decreased by 1.8% from 2019 to 2020; since 2015, MFI (\$55,198) across the county increased 12.7% in 2019 and 10.7% in 2020.
- According to 2018 U.S. Census data estimates, Clark County ranked 60th in Ohio with MFI at \$60,409.

Poverty Rates		
Assessment Area: Springfield, OH MSA #44220		
Area	2018	2019
Clark County	14.9	14.6
Ohio	13.8	13.0
United States	13.1	12.3

- While poverty rates in Clark County decreased, the county’s rates were higher than the poverty rates across Ohio and the nation in 2018–2019.
- Of the 35,980 families in the AA, 38.3% are designated as LMI, with 13.2% living below the poverty line; compared to 38.9% of families in Ohio designated as LMI, with 11.5% living below the poverty line.
- Of the 54,809 households in the AA, 16.8% are below the poverty line and 6.1% receive public assistance.

Housing Characteristics

Housing Cost Change										
Assessment Area: Springfield, OH MSA #44220										
Area	Median Housing Value					Median Gross Rent				
	2010	2015	% Change between 2010 and 2015	2019	% Change between 2015 and 2019	2010	2015	% Change between 2010 and 2015	2019	% Change between 2015 and 2019
Clark County	\$109,877	\$103,585	5.7	\$115,500	11.5	\$632	\$675	6.8	\$749	11.0
Ohio	\$136,400	\$129,900	4.8	\$145,700	12.2	\$678	\$730	7.7	\$808	10.7

Source: 2006-2010 U.S. Census Bureau: American Community Survey
2011-2015 U.S. Census Bureau: American Community Survey
2015-2019 U.S. Census Bureau: American Community Survey

- While median housing values decreased from 2010-2015, median housing values increased significantly from 2015-2019. However, housing become more affordable across

the AA, primarily due to the increasing MFI. The affordability ratio⁶ went from 42.1 in 2015 to 44.0 in 2019.

- Conversely median gross rents across the AA increased by as much as 11.0% from 2015-2019. The rise in median gross rents demonstrates the need for more affordable housing, considering the larger percentage of low- and moderate-income families dependent upon the rental market.
- There are 61,241 housing units in the AA and 59.3% are owner occupied, 30.2% are rental, and 10.5% are vacant, compared to 4,772 (7.8%) of housing units in low-income tracts of which 24.0% are owner-occupied, 55.6% are rental, and 20.5% are vacant; and 16,672 (27.2%) of housing units in moderate-income tracts of which 44.0% are owner-occupied, 41.7% are rental, and 14.3% are vacant.
- With 40.7% of housing units being either rental or vacant, there appears to be limited opportunities to originate home mortgage loans in the AA, particularly in LMI areas where less than one-quarter the housing units are owner-occupied.
- The median age of housing stock in the AA is 60 years old, and 33.1% of housing units were built prior to 1950 (over 70 years old). The age of the housing stock across the AA may indicate a need for home improvement lending and for refinance or home improvement loans to remove lead-based paint which was commonly used on houses and apartments built before 1978.⁷

Housing Cost Burden						
Assessment Area: Springfield, OH MSA #44220						
Area	Cost Burden - Owners			Cost Burden - Renters		
	Low Income	Moderate Income	All Owners	Low Income	Moderate Income	All Renters
Clark County	62%	32%	18%	76%	46%	46%
Ohio	64%	35%	20%	74%	32%	43%

Cost Burden is housing cost that equals 30 percent or more of household income

- Nearly 62.0% of low-income homeowners and 76.0% of low-income renters are cost-burdened, compared to 32.0% of moderate-income homeowners and 46.0% of moderate-income renters.
- 18.0% of homeowners across the AA are cost-burdened, which is less than homeowners across Ohio.
- 46.0% of renters across the AA are cost-burdened, which is greater than renters across the Ohio.
- However, the data shows that cost burden disproportionately affects renter-occupied households.

⁶The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered.

⁷Ohio Department of Health/Know Our Programs/Childhood Lead Poisoning

- Based on the increasing home values and rental rates; LMI individuals, particularly those who are cost-burdened, may have a difficult time saving enough to make a sufficient down payment or affording increasing rents.

Building Permits by Number of Units					
Assessment Area: Springfield, OH MSA #44220					
Area	2018	2019	% Change between 2018 and 2019	2020	% Change between 2019 and 2020
Clark County	68	76	11.8	139	82.9
Ohio	24,221	23,047	4.8	29,686	28.8
United States	1,328,827	1,386,048	4.3	1,471,141	6.1

Source: U.S. Census Bureau Building Permits Survey

- Building permits are a leading indicator of future activity in the construction sector. From 2018-2020, building permits in the AA significantly increased.
- The increase of building permits could indicate an increasing demand for home purchase loans in the AA. However, a community contact indicated that new housing development has been limited.

Labor, Employment and Economic Characteristics

Unemployment Rates			
Assessment Area: Springfield, OH MSA #44220			
Area	2018	2019	2020
Clark County	4.6%	4.3%	8.1%
Ohio	4.5%	4.2%	8.1%

- While 2018-2019 unemployment rates decreased across the AA, 2020 unemployment rates increased by 3.8 percentage points in response to the COVID-19 pandemic.
- According to Ohio Office of Research,⁸ Clark County is most impacted by the industries of trade, transportation, and utilities; education and health services; manufacturing; local government; leisure and hospitality; professional and business services; and financial services. Major employers include Assurant Specialty Property Inc., Cedarville University, Clark County government, Community Mercy Health Partners (Springfield Regional Medical Center), Dole Fresh Vegetables, Marathon/Speedway SuperAmerica,

⁸ www.development.oh.gov/reports_countytrends_map

Navistar, Inc., Ohio Air National Guard – 178th Wing, Springfield City Schools, Wright Patterson Airforce Base, and Yamada North America. The average weekly wage for the private sector is \$777, which indicates that employed persons could afford the median rent of \$749.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN
SPRINGFIELD OH MSA #44220**

LENDING TEST

The lending test performance in the Springfield MSA is reasonable. Details of Richwood’s lending can be found in the tables in Appendix C.

Geographic Distribution of Loans

Richwood’s geographic distribution reflects a reasonable dispersion of loans in the Springfield MSA. Richwood has a moderate level of lending gaps.

Percentage of Lending Penetration		
Tract Income Level	2019	2020
Low	50.0%	75.0%
Moderate	57.1%	92.9%
Middle	50.0%	100.0%
Upper	90.0%	90.0%
Total	61.4%	93.2%

Richwood penetrated three out of four low-income tracts and 13 out of 14 moderate-income tracts in 2020. The improved penetration rate in 2020 can be attributed to the inclusion of all the bank’s major loan categories in this evaluation.

Small Business Lending

Richwood made 239 small business loans totaling \$30.4 million in 2020. Richwood originated two (0.8%) small business loans in low-income tracts, which was well below the percentage of businesses in those tracts at 4.8%. Richwood originated 14 (5.9%) small business loans in moderate-income tracts, which was well below the percentage of businesses in those tracts at 28.7%. However, since Richwood opted to include its PPP loans in amounts of \$1.0 million or less in LMI tracts for consideration under the community development test, the geographic distribution largely skewed towards the middle- and upper-income tracts. If PPP loans were excluded from the analysis, the percentage of small business loans in LMI tracts is 2.8% and 19.4%, respectively, which is closer to the corresponding proxies. Therefore, the geographic distribution of small business loans in LMI tracts is reasonable.

HMDA Lending

During the evaluation period Richwood made 187 HMDA loans totaling \$29.9 million, including 102 refinance and 72 home purchase loans totaling \$16.4 million and \$9.5 million, respectively. Richwood's performance was compared to the percentage of owner-occupied units by tract income (proxy) and the aggregate of all lenders. Richwood's geographic distribution of HMDA loans is reasonable.

Refinance Lending

Richwood made 74 refinance loans totaling \$12.3 million in 2020. Richwood originated one (1.4%) refinance loans in low-income tracts, which was well below the percentage of owner-occupied units at 3.1% and exceeded the aggregate of all lenders at 0.8%. Richwood originated eight (10.8%) refinance loans in moderate-income tracts, which was below the percentage of owner-occupied units at 20.2% and exceeded the aggregate of all lenders at 9.9%.

Richwood made 28 refinance loans totaling \$4.1 million in 2019. Richwood originated one (3.6%) refinance loans in low-income tracts, which exceeded the percentage of owner-occupied units at 3.1% and the aggregate of all lenders at 1.2%. Richwood originated two (7.1%) refinance loans in moderate-income tracts, which was well below the percentage of owner-occupied units at 20.2% and below the aggregate of all lenders at 10.6%.

The geographic distribution of refinance lending is reasonable in LMI tracts.

Home Purchase Lending

Richwood made 37 home purchase loans totaling \$4.2 million in 2020. Richwood originated two (5.4%) home purchase loans in low-income tracts, which exceeded the percentage of owner-occupied units at 3.1% and the aggregate of all lenders at 2.4%. Richwood originated 12 (32.4%) home purchase loans in moderate-income tracts, which exceeded the percentage of owner-occupied units at 20.2% and the aggregate of all lenders at 21.4%.

Richwood made 35 home purchase loans totaling \$5.4 million in 2019. Richwood originated one (2.9%) home purchase loans in low-income tracts, which was below the percentage of owner-occupied units at 3.1% and exceeded the aggregate of all lenders at 1.0%. Richwood originated eight (22.9%) home purchase loans in moderate-income tracts, which exceeded the percentage of owner-occupied units at 20.2% and the aggregate of all lenders at 20.4%.

The geographic distribution of home purchase lending is reasonable in low-income tracts and excellent in moderate-income tracts.

Small Farm Lending

Richwood made 34 small farm loans totaling \$15.7 million in 2020. Richwood made no loans in LMI tracts, compared to the percentage of farms in those tracts at 0.7% and 4.0%, respectively. Considering there are few farms in these tracts, the geographic distribution of small farms loans in LMI tracts is reasonable.

Lending to Borrowers of Different Income Levels and Businesses and Farms of Different Sizes

Richwood's lending penetration among borrowers of different income (including LMI) levels and to businesses and farms of different sizes in the Springfield MSA is considered reasonable.

The borrower distribution performance to businesses of different sizes in 2020 will not receive much weight, since gross annual revenue information was not available for a large percentage of Richwood's small business loans. Most of these loans were PPP loans, and banks were not required to collect revenue data for PPP loans.

Small Business Lending

Richwood made 239 small business loans totaling \$30.4 million to businesses of different sizes in 2020, of which 45 (18.8%) loans totaling \$6.5 million were made to businesses with unknown gross annual revenues. Of the total small business loans, 69.9% are PPP loans.

Richwood made 74.5% of small dollar loans in amounts of \$100,000 or less. This indicates the bank's willingness to lend in smaller amounts that tend to represent amounts typically requested by small businesses, particularly small businesses impacted by the COVID-19 emergency.

HMDA Lending

During the evaluation period Richwood made 187 HMDA loans totaling \$29.9 million comprised of 102 refinance and 72 home purchase loans totaling \$16.4 million and \$9.5 million, respectively. Richwood's performance was compared to the percentage of families by family income (proxy) and the aggregate of all lenders. Richwood's borrower distribution of HMDA loans is reasonable.

Refinance Lending

Richwood made 74 refinance loans totaling \$12.3 million in 2020. Richwood also made five (6.8%) refinance loans to borrowers with unknown-income designations. Richwood originated seven (9.5%) refinance loans to low-income borrowers, which was well below the percentage of families at 20.9% and exceeded the aggregate of all lenders at 4.3%. Richwood originated 11 (14.9%)

refinance loans to moderate-income borrowers, which was below the percentage of families at 17.4% and exceeded the aggregate of all lenders at 11.3%.

Richwood made 28 refinance loans totaling \$4.1 million in 2019. Richwood also made one (3.6%) refinance loan to borrowers with unknown-income designations. Richwood originated one (3.6%) refinance loan to low-income borrowers, which was well below the percentage of families at 20.9% and the aggregate of all lenders at 7.8%. Richwood originated five (17.9%) refinance loans to moderate-income borrowers, which exceeded the percentage of families at 17.4% and the aggregate of all lenders at 14.7%.

The borrower distribution of refinance lending is reasonable to LMI borrowers.

Home Purchase Lending

Richwood made 37 home purchase loans totaling \$4.2 million in 2020. Richwood also made 13 (35.1%) home purchase loans to borrowers with unknown-income designations. Richwood originated five (13.5%) home purchase loans to low-income borrowers, which was below the percentage of families at 20.9% but exceeded the aggregate of all lenders at 8.1%. Richwood originated two (5.4%) home purchase loans to moderate-income borrowers, which was well below the percentage of families at 17.4% and aggregate of all lenders at 24.7%.

Richwood made 35 home purchase loans totaling \$5.4 million in 2019. Richwood also made six (17.1%) home purchase loans to borrowers with unknown-income designations. Richwood originated one (2.9%) home purchase loan to low-income borrowers, which was well below the percentage of families at 20.9% and the aggregate of all lenders at 8.0%. Richwood originated four (28.3%) home purchase loans to moderate-income borrowers, which was below the percentage of families at 17.4% and the aggregate of all lenders at 24.3%.

The borrower distribution of home purchase lending is reasonable to LMI borrowers.

Small Farm Lending

Richwood made 34 small farm loans totaling \$15.7 million to farms of different sizes in 2020. Richwood made 20 (58.8%) loans totaling \$4.5 million to farms with revenues of \$1.0 million or less, which was below the percentage of small farms in the AA at 96.6%. Of the total small farm loans, 17.6% are PPP loans; and nine (26.5%) loans totaling \$1.4 million were made to farms with unknown gross annual revenues. PPP loans did not impact the ability to perform a meaningful analysis. Given Richwood's performance compared to the proxy, the borrower distribution of small farm loans is reasonable.

Richwood made 52.9% of small dollar loans in amounts of \$100,000 or less. This indicates the bank's willingness to lend in smaller amounts that tend to represent amounts typically

requested by small farms, particularly small farms impacted by the COVID-19 emergency.

COMMUNITY DEVELOPMENT TEST

Richwood's community development performance demonstrates adequate responsiveness to community development needs of the Springfield MSA.

While PPP loans helped small businesses struggling to stay open amid the COVID-19 crisis, community contacts identified all aspects of housing as a top priority in the AA and the need for workforce development to help attract and retain the quality workforce needed to keep Springfield's economy growing. Although Richwood entered this market in December 2018, Richwood's community development activities mostly consisted of PPP loans originated in 2020 and a few small dollar donations that supported a narrow scope of community development needs. While this market is competitive, Richwood made a large amount of PPP loans in LMI geographies. Also, there were opportunities to engage in more varied community development activities to meet identified needs in the community, especially considering Richwood's capacity and market share in the AA.

Community Development Lending

Richwood originated 101 community development loans totaling \$8.3 million in the Springfield MSA, which represents 48.5% of Richwood's total community development lending by dollar amount during this evaluation period. All the community development loans were PPP loans made in response to the COVID-19 crisis to help local businesses remain open and retain their workforce.

Qualified Investments

Richwood made nine donations totaling \$10,674 to four organizations, which represents 6.0% of Richwood's total qualified donations by dollar amount during the evaluation period. All qualified donations were made through Richwood's full-service coffee bar that awards donations to non-profits with a high-end coffee drink.

The contributions supported organizations that provide community services targeted to LMI individuals and families and promote revitalization of a moderate-income neighborhood.

Community Development Services

One employee provided leadership, financial, and/or technical expertise to four community organizations offering services to LMI individuals and families and promoting economic development or affordable housing. Community development services include approximately 720 hours either serving on boards and/or committees and providing financial literacy education

or technical expertise. For example, this employee provided financial literacy training to LMI high school students and served on a loan approval committee for an affordable housing agency and as a board member on an SBA lending committee.

NONMETROPOLITAN AREA
(Limited-scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS

- **Nonmetropolitan Ohio**
 - As of December 31, 2020, Richwood operated a branch in Huntsville (Logan County) and a branch in LaRue (Marion County),⁹ representing 25.0% of its branches.
 - As of June 30, 2020, Richwood had \$74.7 million in deposits in this AA representing a market share of 4.3%.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Using available facts and data, including performance and demographic information, the AA's performance was evaluated and compared with Richwood's overall performance. The conclusions regarding performance are provided in the tables below. Please refer to the tables in Appendix C for information regarding these areas.

AA	Lending Test	Community Development Test
Nonmetropolitan Ohio	Consistent	Above

For the lending test, Richwood received a "Satisfactory" rating. Performance in this limited-scope AA was consistent with Richwood's overall performance. The borrower distribution is reasonable, and geographic distribution of loans is reasonable, with a significant level of lending gaps.

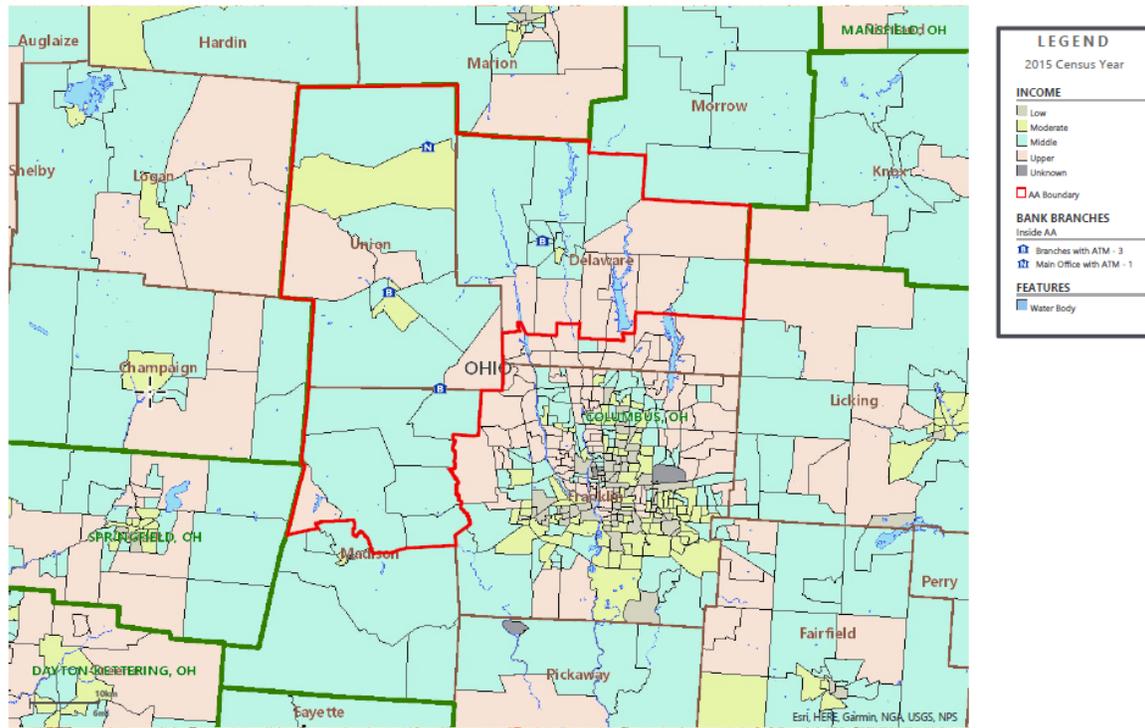
For the community development test, Richwood received a "Satisfactory" rating. Community development was above Richwood's overall performance. The stronger performance was primarily due to the three new investments worth approximately \$1.3 million. Refer to page 11 for details about the qualified community development investments in this AA.

The performance in the limited-scope AA did not change the overall rating.

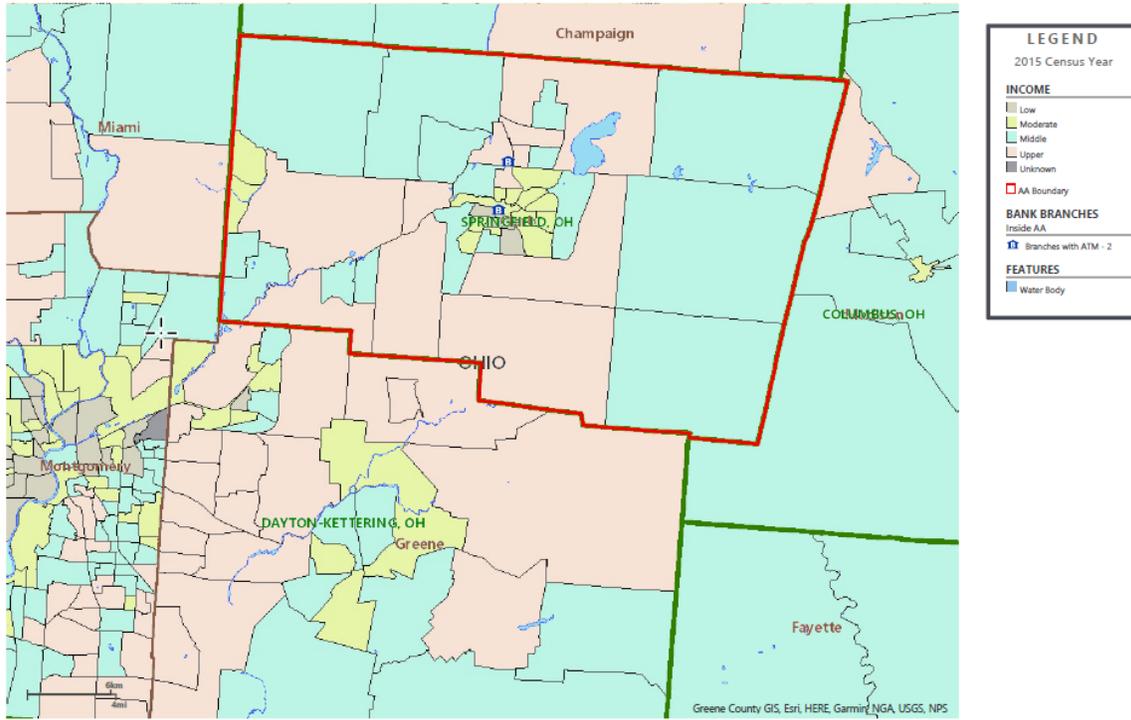
⁹ Richwood opened a branch in Bellefontaine (Logan County) in 2021 and will be opening a branch in Champaign County in the latter half of 2021. Activity from these branches will be considered in subsequent CRA evaluation(s).

Appendix A – Maps of the Assessment Areas

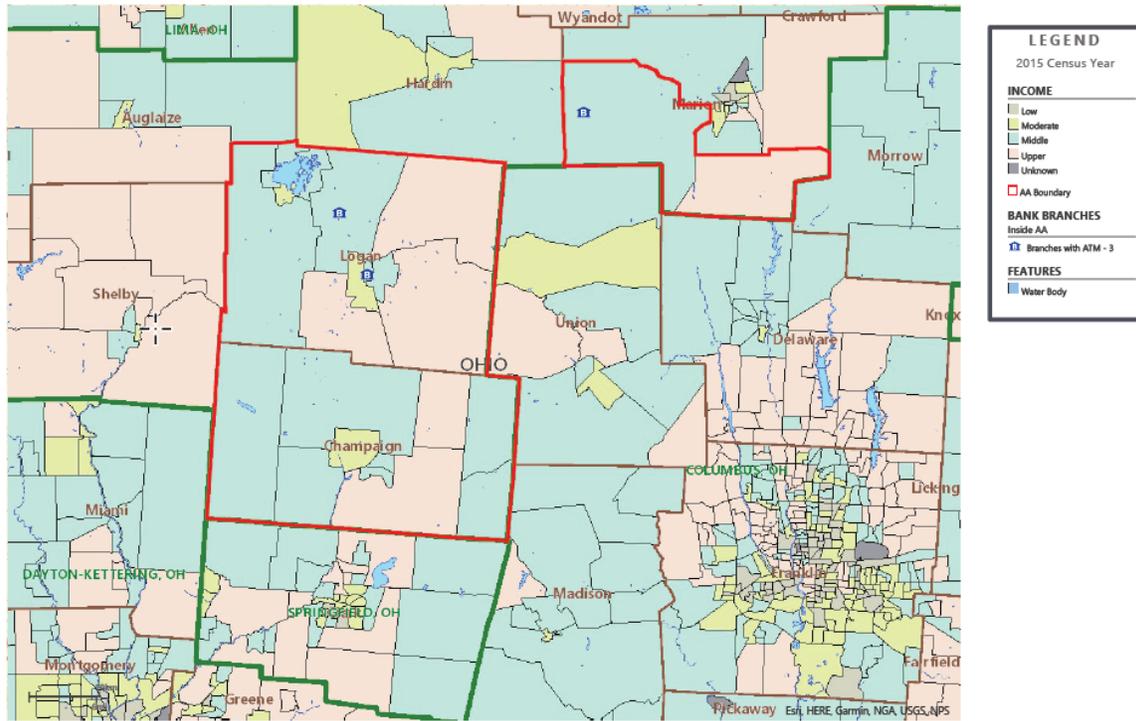
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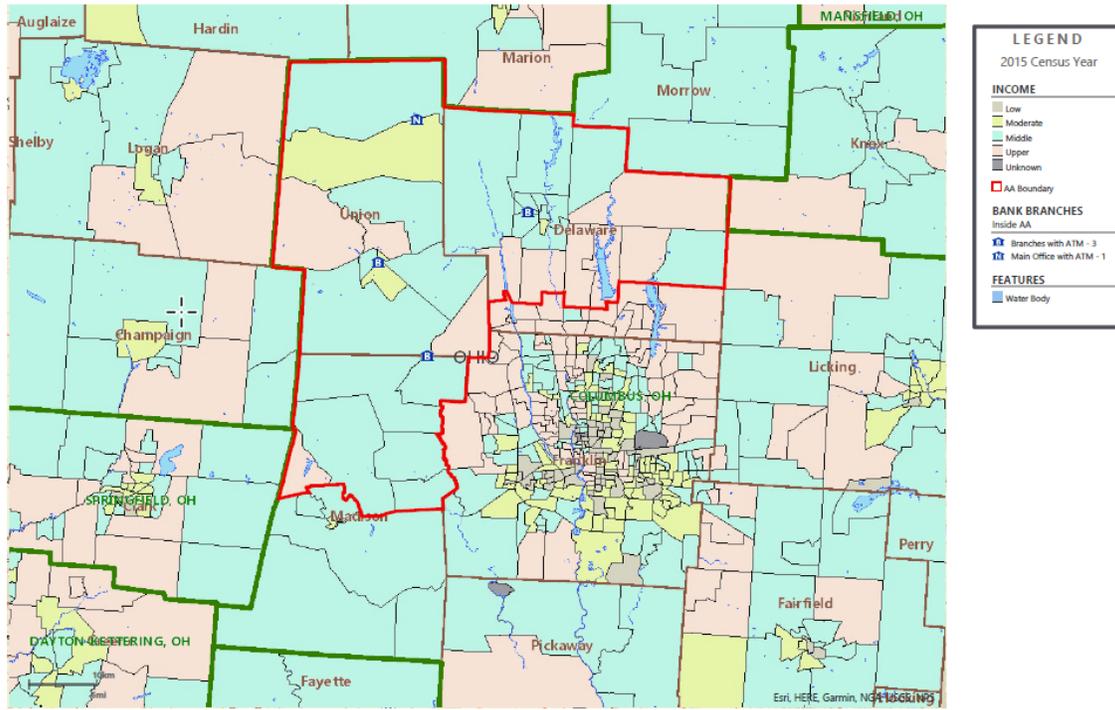
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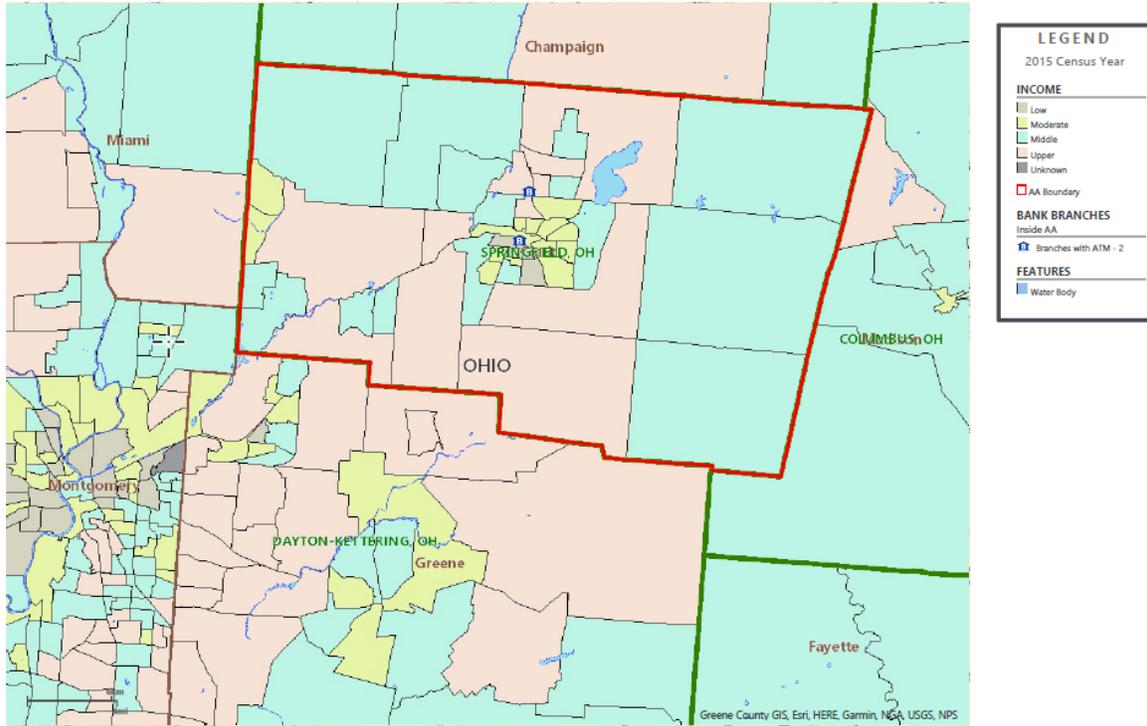
Assessment Area: 2020 Nonmetropolitan OH



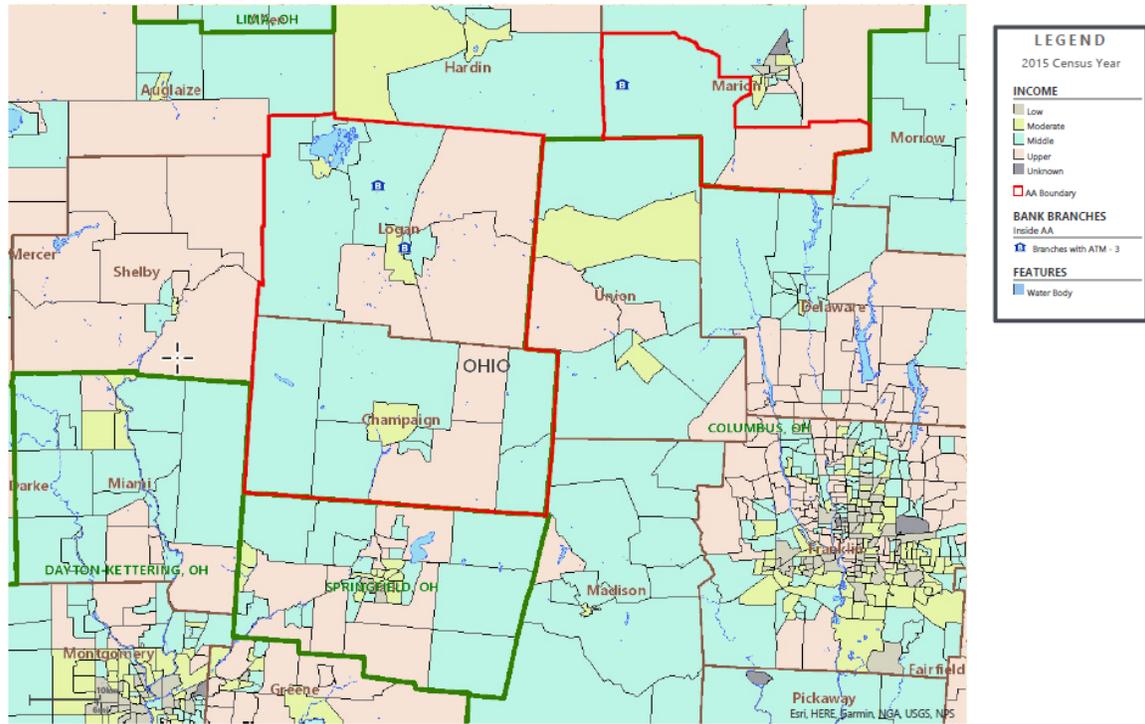
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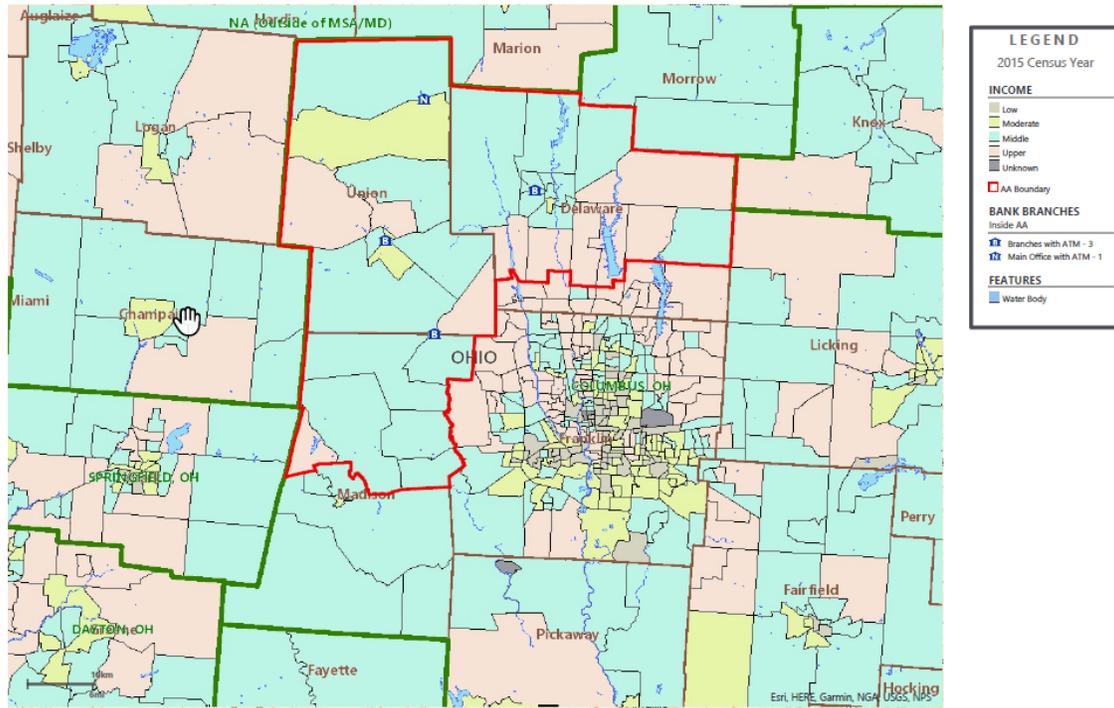
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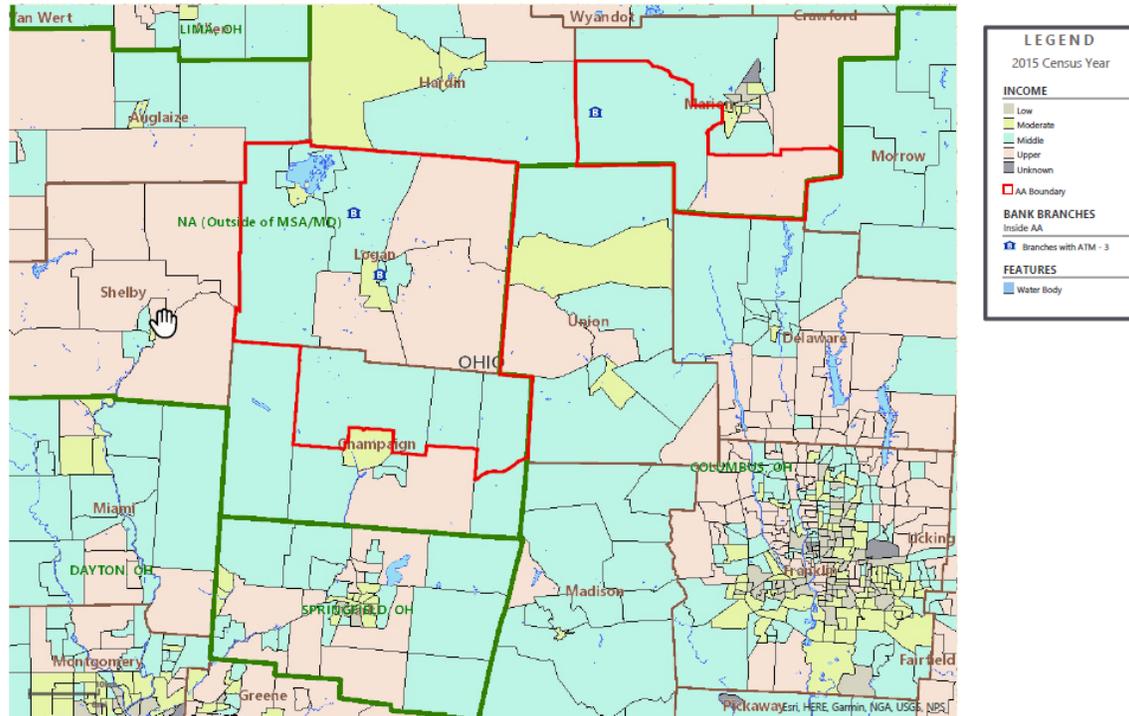
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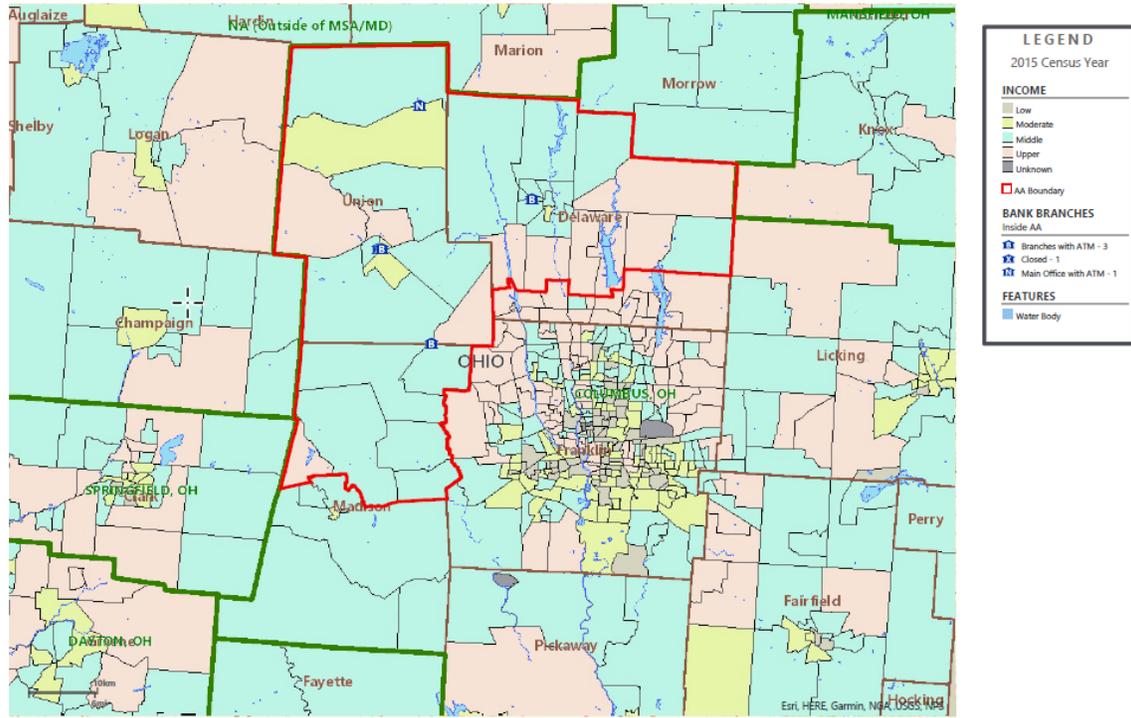
Assessment Area: 2018 Columbus, OH MSA #18140



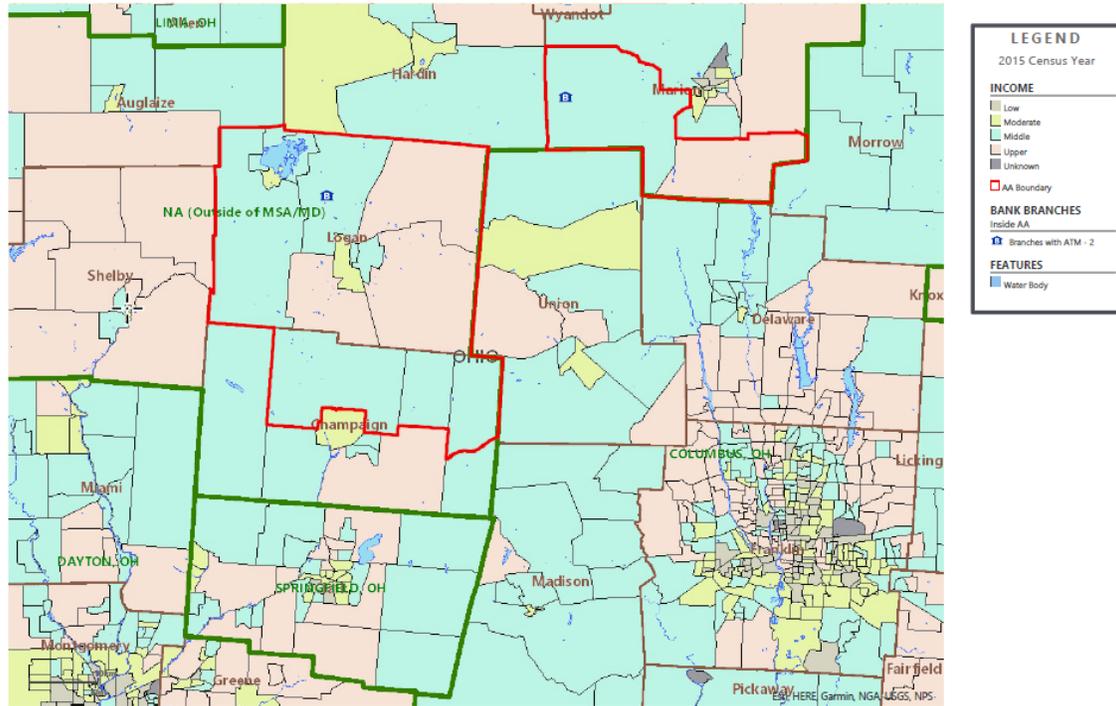
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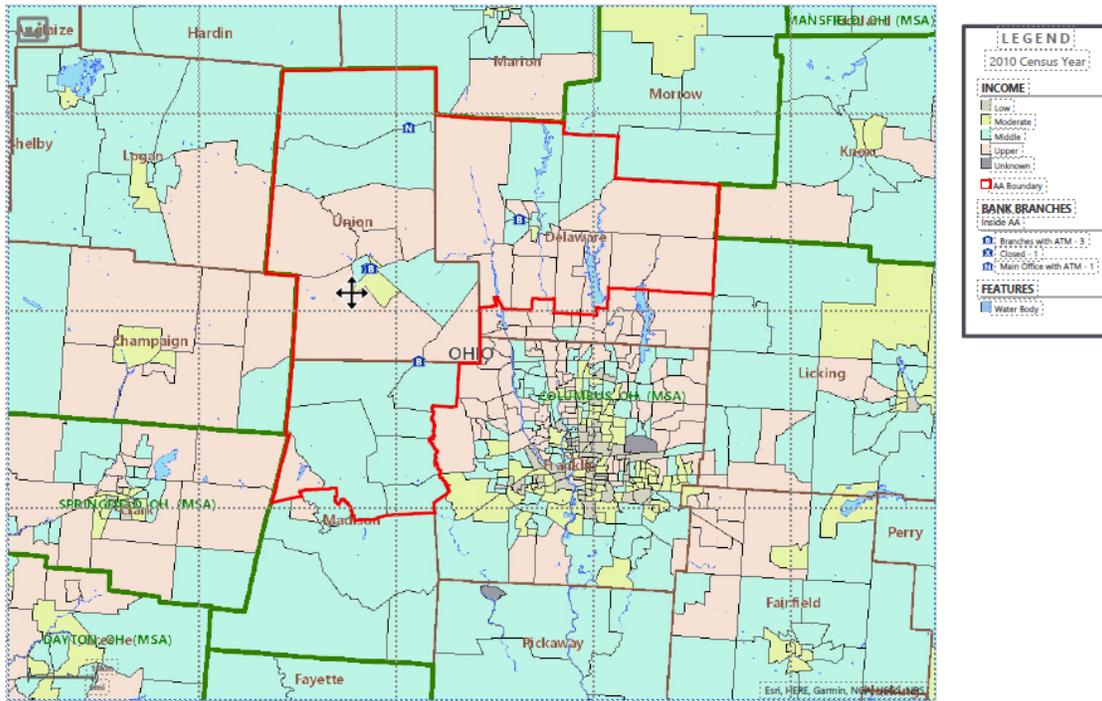
Assessment Area: 2017 Columbus, OH MSA #18140



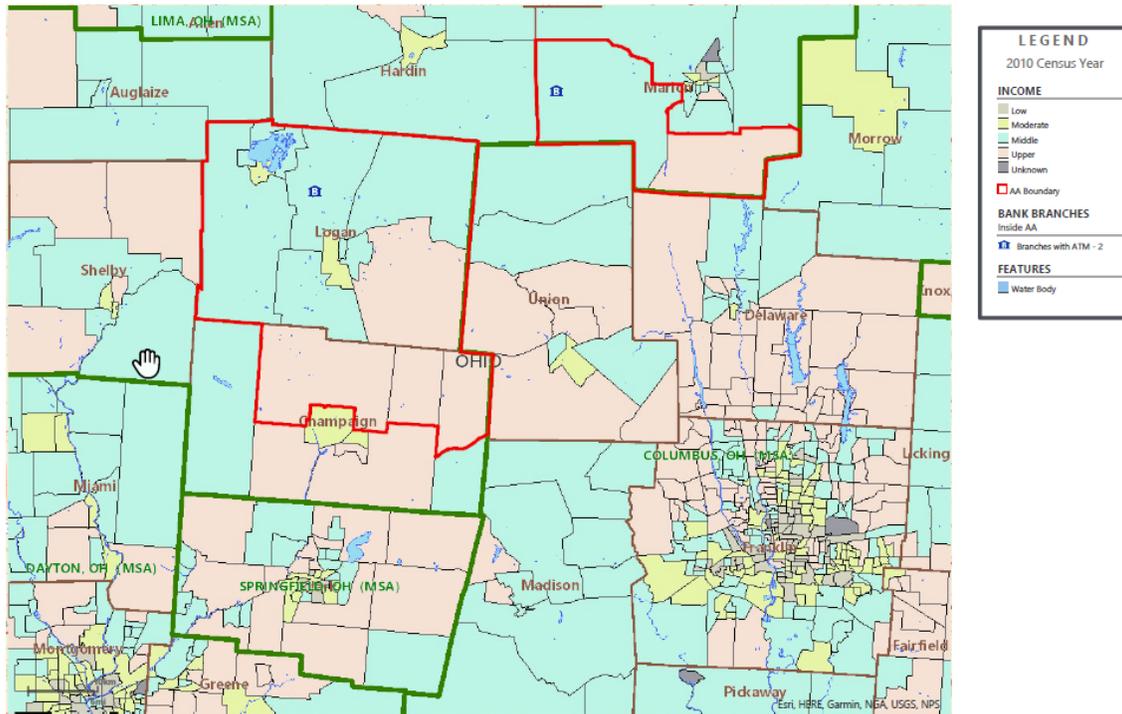
Assessment Area: 2017 Nonmetropolitan OH



Assessment Area: 2016 Columbus, OH MSA #18140



Assessment Area: 2016 Nonmetropolitan OH



Appendix B – Demographic Information

2020 COLUMBUS, OH MSA #18140 AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	6,260	14.0
Moderate	3	8.8	3,270	7.3	672	20.6	6,900	15.5
Middle	21	61.8	24,277	54.5	1,268	5.2	8,469	19.0
Upper	10	29.4	17,026	38.2	369	2.2	22,944	51.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	34	100.0	44,573	100.0	2,309	5.2	44,573	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	5,967	3,195	6.8	53.5	2,335	39.1	437	7.3
Middle	36,159	25,162	53.9	69.6	8,942	24.7	2,055	5.7
Upper	21,105	18,296	39.2	86.7	1,635	8.7	977	4.6
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	63,234	46,653	100.0	73.8	13,112	20.7	3,469	5.5
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	528	7.3	480	7.2	42	8.6	6	6.3
Middle	3,568	49.4	3,276	49.4	240	49.3	52	54.2
Upper	3,122	43.3	2,879	43.4	205	42.1	38	39.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	7,218	100.0	6,635	100.0	487	100.0	96	100.0
Percentage of Total Businesses:				91.9		6.7		1.3
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	21	6.0	20	5.8	1	25.0	0	0.0
Middle	232	65.9	231	66.6	0	0.0	1	100.0
Upper	99	28.1	96	27.7	3	75.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	352	100.0	347	100.0	4	100.0	1	100.0
Percentage of Total Farms:				98.6		1.1		0.3
Source: 2020 FFIEC Census Data 2020 Dux & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

2020 SPRINGFIELD, OH MSA #44220 DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	4	9.1	2,265	6.3	1,034	45.7	7,522	20.9
Moderate	14	31.8	8,504	23.6	1,842	21.7	6,270	17.4
Middle	16	36.4	15,678	43.6	1,529	9.8	7,519	20.9
Upper	10	22.7	9,533	26.5	343	3.6	14,669	40.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	44	100.0	35,980	100.0	4,748	13.2	35,980	100.0
Housing Units by Tract	Housing Type by Tract							
	Owner-occupied				Rental		Vacant	
	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	4,772	1,143	3.1	24.0	2,651	55.6	978	20.5
Moderate	16,672	7,328	20.2	44.0	6,959	41.7	2,385	14.3
Middle	24,775	16,919	46.6	68.3	5,846	23.6	2,010	8.1
Upper	15,022	10,920	30.1	72.7	3,043	20.3	1,059	7.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	61,241	36,310	100.0	59.3	18,499	30.2	6,432	10.5
Total Businesses by Tract	Businesses by Tract & Revenue Size							
	Total Businesses by Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	193	4.8	166	4.6	27	7.5	0	0.0
Moderate	1,147	28.7	1,014	28.3	120	35.4	13	27.7
Middle	1,471	36.8	1,335	37.2	107	29.8	29	61.7
Upper	1,181	29.6	1,071	29.9	105	29.2	5	10.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	3,992	100.0	3,586	100.0	359	100.0	47	100.0
Percentage of Total Businesses:				89.8	9.0			
Total Farms by Tract	Farms by Tract & Revenue Size							
	Total Farms by Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1	0.7	1	0.7	0	0.0	0	0.0
Moderate	6	4.0	5	3.5	1	20.0	0	0.0
Middle	78	52.3	76	52.8	2	40.0	0	0.0
Upper	64	43.0	62	43.1	2	40.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	149	100.0	144	100.0	5	100.0	0	0.0
Percentage of Total Farms:				96.6	3.4			
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

2020 NONMETROPOLITAN OHIO AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	4,766	17.9
Moderate	3	13.0	2,644	9.9	456	17.2	4,169	15.6
Middle	14	60.9	16,325	61.3	1,768	10.8	6,035	22.6
Upper	6	26.1	7,681	28.8	262	3.4	11,680	43.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	23	100.0	26,650	100.0	2,486	9.3	26,650	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	5,814	2,316	8.2	39.8	2,142	36.8	1,356	23.3
Middle	27,980	17,374	61.5	62.1	6,115	21.9	4,491	16.1
Upper	10,599	8,564	30.3	80.8	1,505	14.2	530	5.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	44,393	28,254	100.0	63.6	9,762	22.0	6,377	14.4
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0	0.0	0	0.0	0	0.0	
Moderate	339	302	11.1	11.0	30	13.1	7	9.7
Middle	1,937	1,756	63.7	64.1	133	58.1	48	66.7
Upper	766	683	25.2	24.9	66	28.8	17	23.6
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	3,042	2,741	100.0	90.1	229	100.0	72	100.0
Percentage of Total Businesses:						7.5		2.4
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0	0.0	0	0.0	0	0.0	
Moderate	7	7	2.0	2.0	0	0.0	0	0.0
Middle	218	213	61.1	61.0	3	75.0	2	50.0
Upper	132	129	37.0	37.0	1	25.0	2	50.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	357	349	100.0	97.8	4	100.0	4	100.0
Percentage of Total Farms:						1.1		1.1
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

2019 COLUMBUS, OH MSA #18140 AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	6,260	14.0
Moderate	3	8.8	3,270	7.3	672	20.6	6,900	15.5
Middle	21	61.8	24,277	54.5	1,268	5.2	8,469	19.0
Upper	10	29.4	17,026	38.2	369	2.2	22,944	51.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	34	100.0	44,573	100.0	2,309	5.2	44,573	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	5,967	3,195	6.5	53.5	2,335	39.1	437	7.3
Middle	36,159	25,162	53.9	69.6	8,942	24.7	2,055	5.7
Upper	21,108	18,296	39.2	86.7	1,535	8.7	977	4.6
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	63,234	46,653	100.0	73.8	13,112	20.7	3,469	5.5
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	520	7.3	467	7.1	46	9.2	7	7.7
Middle	3,547	49.7	3,264	49.9	234	46.7	49	53.8
Upper	3,072	43.0	2,816	43.0	221	44.1	35	38.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	7,139	100.0	6,547	100.0	501	100.0	91	100.0
Percentage of Total Businesses:								
				91.7		7.0		1.3
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	24	6.5	23	6.3	1	25.0	0	0.0
Middle	243	65.7	242	66.5	0	0.0	1	50.0
Upper	103	27.8	99	27.2	3	75.0	1	50.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	370	100.0	364	100.0	4	100.0	2	100.0
Percentage of Total Farms:								
				98.4		1.1		0.5
Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

2019 SPRINGFIELD, OH MSA #44220 AA DEMOGRAPHICS									
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low	4	9.1	2,265	6.3	1,034	45.7	7,522	20.9	
Moderate	14	31.8	8,504	23.6	1,842	21.7	6,270	17.4	
Middle	16	36.4	15,678	43.6	1,529	9.8	7,519	20.9	
Upper	10	22.7	9,533	26.5	343	3.6	14,669	40.8	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	44	100.0	35,980	100.0	4,748	13.2	35,980	100.0	
	Housing Units by Tract	Housing Type by Tract							
		Owner-occupied			Rental		Vacant		
		#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	4,772	1,143	3.1	24.0	2,651	55.6	978	20.5	
Moderate	16,672	7,328	20.2	44.0	6,959	41.7	2,385	14.3	
Middle	24,775	16,919	46.6	68.3	5,546	23.6	2,010	8.1	
Upper	15,022	10,920	30.1	72.7	3,043	20.3	1,059	7.0	
Unknown	0	0	0.0	0.0	0	0.0	0	0.0	
Total AA	61,241	36,310	100.0	59.3	18,499	30.2	6,432	10.5	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%		
Low	209	5.2	182	5.0	27	7.4	0	0.0	
Moderate	1,142	28.2	1,012	27.9	119	32.8	11	23.4	
Middle	1,485	36.7	1,343	37.0	113	31.1	29	61.7	
Upper	1,207	29.9	1,096	30.2	104	28.7	7	14.9	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	4,043	100.0	3,633	100.0	363	100.0	47	100.0	
Percentage of Total Businesses:				89.9		9.0		1.2	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%		
Low	1	0.7	1	0.7	0	0.0	0	0.0	
Moderate	6	4.0	4	2.7	1	25.0	1	100.0	
Middle	78	51.7	76	52.1	2	50.0	0	0.0	
Upper	66	43.7	65	44.5	1	25.0	0	0.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	151	100.0	146	100.0	4	100.0	1	100.0	
Percentage of Total Farms:				96.7		2.6		0.7	
Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.									

2019 NONMETROPOLITAN AA DEMOGRAPHICS									
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	4,766	17.9	
Moderate	3	13.0	2,644	9.9	456	17.2	4,169	15.6	
Middle	14	60.9	16,325	61.3	1,768	10.8	6,035	22.6	
Upper	6	26.1	7,681	28.8	262	3.4	11,680	43.8	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	23	100.0	26,650	100.0	2,486	9.3	26,650	100.0	
	Housing Units by Tract	Housing Type by Tract							
		Owner-occupied			Rental		Vacant		
		#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	0	0	0.0	0.0	0	0.0	0	0.0	
Moderate	5,814	2,316	8.2	39.8	2,142	36.8	1,356	23.3	
Middle	27,980	17,374	61.5	62.1	6,115	21.9	4,491	16.1	
Upper	10,599	8,564	30.3	80.8	1,505	14.2	530	5.0	
Unknown	0	0	0.0	0.0	0	0.0	0	0.0	
Total AA	44,393	28,254	100.0	63.6	9,762	22.0	6,377	14.4	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%		
Low	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate	349	11.3	310	11.2	33	13.6	6	8.7	
Middle	1,955	63.3	1,772	63.9	137	56.4	46	66.7	
Upper	783	25.4	693	25.0	73	30.0	17	24.6	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	3,087	100.0	2,775	100.0	243	100.0	69	100.0	
Percentage of Total Businesses:				89.9		7.9		2.2	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%		
Low	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate	10	2.6	10	2.7	0	0.0	0	0.0	
Middle	240	62.7	235	62.7	3	75.0	2	50.0	
Upper	133	34.7	130	34.7	1	25.0	2	50.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	383	100.0	375	100.0	4	100.0	4	100.0	
Percentage of Total Farms:				97.9		1.0		1.0	
Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.									

2018 COLUMBUS, OH MSA #18140 AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	6,260	14.0
Moderate	3	5.8	3,270	7.3	672	20.6	6,900	15.5
Middle	21	61.8	24,277	54.5	1,268	5.2	8,469	19.0
Upper	10	29.4	17,026	38.2	369	2.2	22,944	51.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	34	100.0	44,573	100.0	2,309	5.2	44,573	100.0
Housing Units by Tract	Housing Type by Tract							
	Owner-occupied				Rental		Vacant	
	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	0	0	0.0	0	0.0	0	0.0	
Moderate	5,967	3,196	6.8	53.5	2,335	39.1	437	7.3
Middle	36,159	25,162	53.9	69.6	8,942	24.7	2,055	5.7
Upper	21,108	18,296	39.2	86.7	1,635	8.7	977	4.6
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	63,234	46,653	100.0	73.8	13,112	20.7	3,469	5.5
Total Businesses by Tract	Businesses by Tract & Revenue Size							
	Total Businesses by Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	513	7.1	457	7.0	46	8.9	10	8.4
Middle	3,608	50.0	3,303	50.3	240	46.2	65	54.6
Upper	3,090	42.9	2,813	42.8	233	44.9	44	37.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	7,211	100.0	6,573	100.0	519	100.0	119	100.0
Percentage of Total Businesses:					91.2	7.2	1.7	
Total Farms by Tract	Farms by Tract & Revenue Size							
	Total Farms by Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	26	6.5	25	6.4	1	20.0	0	0.0
Middle	263	65.9	261	66.6	1	20.0	1	50.0
Upper	110	27.6	106	27.0	3	60.0	1	50.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	399	100.0	392	100.0	5	100.0	2	100.0
Percentage of Total Farms:					98.2	1.3	0.5	
Source: 2018 FFIEC Census Data 2018 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

2018 NONMETROPOLITAN OHIO AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	2,958	18.7
Moderate	2	15.4	1,665	10.5	309	18.6	2,395	15.1
Middle	7	53.8	8,523	53.9	1,118	13.1	3,551	22.4
Upper	4	30.3	5,636	35.6	181	3.2	6,920	43.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	13	100.0	15,824	100.0	1,608	10.2	15,824	100.0
Housing Units by Tract	Housing Type by Tract							
	Owner-occupied				Rental		Vacant	
	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	0	0	0.0	0	0.0	0	0.0	
Moderate	3,962	1,441	8.4	36.4	1,382	34.9	1,139	28.7
Middle	16,001	9,353	54.8	58.5	3,267	20.4	3,381	21.1
Upper	7,716	6,265	36.7	81.2	1,071	13.9	380	4.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	27,679	17,059	100.0	61.6	5,720	20.7	4,900	17.7
Total Businesses by Tract	Businesses by Tract & Revenue Size							
	Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	229	12.5	199	12.7	22	13.6	8	14.8
Middle	968	54.3	863	55.1	77	47.5	28	51.9
Upper	586	32.9	505	32.2	63	38.9	18	33.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	1,783	100.0	1,567	100.0	162	100.0	54	100.0
Percentage of Total Businesses:				87.9	9.1	3.0		
Total Farms by Tract	Farms by Tract & Revenue Size							
	Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	5	2.5	5	2.5	0	0.0	0	0.0
Middle	105	51.7	104	52.0	1	33.3	0	0.0
Upper	93	45.8	91	45.5	2	66.7	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	203	100.0	200	100.0	3	100.0	0	0.0
Percentage of Total Farms:				98.5	1.5	0.0		
Source: 2018 FF/EC Census Data 2018 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

2017 COLUMBUS, OH MSA #18140 AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	6,260	14.0
Moderate	3	8.8	3,270	7.3	672	20.6	6,900	15.5
Middle	21	61.8	24,277	54.5	1,268	5.2	8,469	19.0
Upper	10	29.4	17,026	38.2	369	2.2	22,944	51.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	34	100.0	44,573	100.0	2,309	5.2	44,573	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	5,967	3,195	6.8	53.5	2,335	39.1	437	7.3
Middle	36,159	25,162	53.9	69.6	8,942	24.7	2,055	5.7
Upper	21,105	15,296	39.2	56.7	1,535	8.7	977	4.6
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	63,234	46,653	100.0	73.8	13,112	20.7	3,469	5.5
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	422	7.2	374	7.1	42	8.5	6	7.0
Middle	3,037	51.8	2,760	52.2	229	46.5	48	55.8
Upper	2,404	41.0	2,151	40.7	221	44.9	32	37.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	5,863	100.0	5,285	100.0	492	100.0	86	100.0
Percentage of Total Businesses:				90.1		8.4		1.5
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	30	7.5	29	7.7	1	20.0	0	0.0
Middle	254	66.1	252	66.5	2	40.0	0	0.0
Upper	100	26.0	98	25.9	2	40.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	384	100.0	379	100.0	5	100.0	0	0.0
Percentage of Total Farms:				98.7		1.3		0.0
Source: 2017 FFIEC Census Data 2017 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

2017 NONMETROPOLITAN OHIO AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	2,958	18.7
Moderate	2	15.4	1,665	10.5	309	18.6	2,395	15.1
Middle	7	53.8	8,523	53.9	1,118	13.1	3,551	22.4
Upper	4	30.8	5,636	35.6	181	3.2	6,920	43.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	13	100.0	15,824	100.0	1,608	10.2	15,824	100.0
Housing Units by Tract	Housing Type by Tract							
	Owner-occupied				Rental		Vacant	
	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	3,962	1,441	8.4	36.4	1,382	34.9	1,139	28.7
Middle	16,001	9,353	54.5	58.5	3,267	20.4	3,381	21.1
Upper	7,716	6,265	36.7	81.2	1,071	13.9	380	4.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	27,679	17,059	100.0	61.6	5,720	20.7	4,900	17.7
Total Businesses by Tract	Businesses by Tract & Revenue Size							
	Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	195	12.4	163	12.0	27	16.6	5	9.8
Middle	844	53.8	736	54.3	78	47.9	30	58.8
Upper	531	33.8	457	33.7	58	35.6	16	31.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	1,570	100.0	1,356	100.0	163	100.0	51	100.0
Percentage of Total Businesses:			86.4		10.4		3.2	
Total Farms by Tract	Farms by Tract & Revenue Size							
	Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	5	2.5	5	2.6	0	0.0	0	0.0
Middle	110	55.3	109	55.6	1	33.3	0	0.0
Upper	84	42.2	82	41.8	2	66.7	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	199	100.0	196	100.0	3	100.0	0	0.0
Percentage of Total Farms:			98.5		1.5		0.0	
Source: 2017 FFIEC Census Data 2017 Dux & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

2016 COLUMBUS, OH MSA #18140 AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	5,736	13.4
Moderate	2	5.9	2,002	4.7	263	13.1	5,739	13.4
Middle	15	44.1	16,014	37.4	1,170	7.3	8,612	20.1
Upper	17	50.0	24,786	57.9	706	2.8	22,715	53.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	34	100.0	42,802	100.0	2,139	5.0	42,802	100.0
Housing Units by Tract	Housing Type by Tract							
	Owner-occupied				Rental		Vacant	
	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	0	0	0.0	0	0.0	0	0.0	
Moderate	3,979	1,587	3.5	39.9	1,940	48.8	452	11.4
Middle	24,327	16,287	36.2	67.0	6,460	26.6	1,580	6.5
Upper	32,401	27,073	60.2	83.6	3,823	11.8	1,505	4.6
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	60,707	44,947	100.0	74.0	12,223	20.1	3,537	5.8
Total Businesses by Tract	Businesses by Tract & Revenue Size							
	Total Businesses by Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	360	5.5	317	5.3	40	8.2	3	3.4
Middle	2,254	34.7	2,063	34.8	159	32.5	32	36.0
Upper	3,891	59.8	3,547	59.8	290	59.3	54	60.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	6,505	100.0	5,927	100.0	489	100.0	89	100.0
Percentage of Total Businesses:					91.1	7.5	1.4	
Total Farms by Tract	Farms by Tract & Revenue Size							
	Total Farms by Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	1	0.2	1	0.2	0	0.0	0	0.0
Middle	195	43.4	193	43.6	2	33.3	0	0.0
Upper	253	56.3	249	56.2	4	66.7	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	449	100.0	443	100.0	6	100.0	0	0.0
Percentage of Total Farms:					98.7	1.3	0.0	
Source: 2016 FFIEC Census Data 2016 Dun & Bradstreet Data 2006-2010 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

2016 NONMETROPOLITAN OHIO AA DEMOGRAPHICS									
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	3,184	19.9	
Moderate	2	15.4	1,987	12.4	440	22.1	2,509	15.7	
Middle	9	69.2	10,827	67.6	1,085	10.0	3,513	21.9	
Upper	2	15.4	3,193	19.9	152	4.8	6,801	42.5	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	13	100.0	16,007	100.0	1,677	10.5	16,007	100.0	
	Housing Units by Tract	Housing Type by Tract							
		Owner-occupied			Rental		Vacant		
		#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	0	0	0.0	0.0	0	0.0	0	0.0	
Moderate	4,022	1,563	9.2	38.9	1,571	39.1	888	22.1	
Middle	19,053	11,776	69.7	61.5	3,477	18.2	3,800	19.9	
Upper	4,395	3,563	21.1	81.1	572	13.0	260	5.9	
Unknown	0	0	0.0	0.0	0	0.0	0	0.0	
Total AA	27,470	16,902	100.0	61.5	5,620	20.5	4,948	18.0	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%		
Low	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate	217	12.3	183	11.8	28	17.4	6	11.3	
Middle	1,227	69.3	1,089	70.0	100	62.1	38	71.7	
Upper	326	18.4	284	18.3	33	20.5	9	17.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	1,770	100.0	1,556	100.0	161	100.0	53	100.0	
Percentage of Total Businesses:				87.9		9.1		3.0	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%		
Low	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate	5	2.1	5	2.1	0	0.0	0	0.0	
Middle	177	74.4	175	74.5	2	66.7	0	0.0	
Upper	56	23.5	55	23.4	1	33.3	0	0.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	238	100.0	235	100.0	3	100.0	0	0.0	
Percentage of Total Farms:				98.7		1.3		0.0	
Source: 2016 FFIEC Census Data 2016 Dun & Bradstreet Data 2006-2010 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.									

Appendix C – Lending Tables

Distribution of 2020 Small Business Lending by Revenue Size of Businesses					
Assessment Area: Columbus, OH MSA #18140					
	Bank Loans				Total Businesses %
	#	#%	\$(000)	\$%	
By Revenue					
\$1 Million or Less	128	15.0	19,331	27.9	91.9
Over \$1 Million	39	4.6	13,110	18.9	6.7
Revenue Unknown	685	80.4	36,752	53.1	1.3
Total	852	100.0	69,193	100.0	
By Loan Size					
\$100,000 or Less	701	82.3	18,595	26.9	
\$100,001 - \$250,000	105	12.3	17,038	24.6	
\$250,001 - \$1 Million	34	4.0	14,859	21.5	
Total	852	100.0	69,193	100.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or Less	73	57.0	3,198	16.5	
\$100,001 - \$250,000	40	31.3	6,754	34.9	
\$250,001 - \$1 Million	12	9.4	6,006	31.1	
Total	128	100.0	19,331	100.0	
<i>Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

Distribution of 2020 Small Business Lending by Income Level of Geography					
Assessment Area: Columbus, OH MSA #18140					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	0.0
Moderate	32	3.8	3,867	5.6	7.3
Middle	669	78.5	48,643	70.3	49.4
Upper	151	17.7	16,684	24.1	43.3
Unknown	0	0.0	0	0.0	0.0
Total	852	100.0	69,193	100.0	100.0
<i>Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

Distribution of 2020 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Columbus, OH MSA #18140							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	4	8.2	3.8	534	4.8	1.8	14.0
Moderate	11	22.4	14.6	1,550	14.0	9.9	15.5
Middle	10	20.4	22.6	2,269	20.5	20.1	19.0
Upper	15	30.6	45.4	5,672	51.3	55.4	51.5
Unknown	9	18.4	13.6	1,023	9.3	12.7	0.0
Total	49	100.0	100.0	11,048	100.0	100.0	100.0
Refinance Loans							
Low	11	6.1	2.5	1,300	3.6	1.2	14.0
Moderate	49	27.2	8.8	6,892	19.1	5.6	15.5
Middle	38	21.1	18.9	7,695	21.3	16.0	19.0
Upper	77	42.8	51.8	17,948	49.7	58.2	51.5
Unknown	5	2.8	17.8	2,286	6.3	18.9	0.0
Total	180	100.0	100.0	36,121	100.0	100.0	100.0
Home Improvement Loans							
Low	1	20.0	3.8	100	16.6	2.9	14.0
Moderate	2	40.0	9.7	427	70.8	7.7	15.5
Middle	1	20.0	20.3	20	3.3	15.8	19.0
Upper	1	20.0	62.1	56	9.3	65.9	51.5
Unknown	0	0.0	4.1	0	0.0	7.7	0.0
Total	5	100.0	100.0	603	100.0	100.0	100.0
Total HMDA Reportable Loans							
Low	16	6.6	3.0	1,934	3.5	1.4	14.0
Moderate	62	25.5	10.6	8,869	15.9	6.8	15.5
Middle	50	20.6	20.0	10,064	18.0	16.7	19.0
Upper	95	39.1	49.9	25,688	46.0	55.0	51.5
Unknown	20	8.2	16.5	9,244	16.6	20.0	0.0
Total	243	100.0	100.0	55,799	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

Distribution of 2020 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Columbus, OH MSA #18140							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose LOC							
Low	0	0.0	5.0	0	0.0	3.6	14.0
Moderate	0	0.0	9.7	0	0.0	7.1	15.5
Middle	0	0.0	21.9	0	0.0	17.8	19.0
Upper	0	0.0	61.3	0	0.0	69.0	51.5
Unknown	0	0.0	2.1	0	0.0	2.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	4.5	0	0.0	3.2	14.0
Moderate	0	0.0	8.0	0	0.0	7.1	15.5
Middle	1	50.0	27.3	80	23.4	17.2	19.0
Upper	1	50.0	53.4	262	76.6	67.9	51.5
Unknown	0	0.0	6.8	0	0.0	4.6	0.0
Total	2	100.0	100.0	342	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	14.0
Moderate	0	0.0	0.0	0	0.0	0.0	15.5
Middle	0	0.0	0.5	0	0.0	0.3	19.0
Upper	0	0.0	1.1	0	0.0	0.2	51.5
Unknown	0	0.0	98.4	0	0.0	99.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
<i>Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

Distribution of 2020 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Columbus, OH MSA #16140							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	5	10.2	7.0	922	8.3	5.4	6.8
Middle	34	69.4	41.5	5,512	49.9	34.2	53.9
Upper	10	20.4	51.5	4,614	41.8	60.5	39.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	49	100.0	100.0	11,048	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	16	8.9	3.9	2,224	6.2	3.0	6.8
Middle	125	69.4	33.6	24,444	67.7	27.4	53.9
Upper	39	21.7	62.5	9,453	26.2	69.7	39.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	150	100.0	100.0	36,121	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	4.0	0	0.0	4.0	6.8
Middle	4	80.0	37.9	503	53.4	34.1	53.9
Upper	1	20.0	55.1	100	16.6	61.9	39.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	5	100.0	100.0	603	100.0	100.0	100.0
Multifamily Loans							Multifamily Units %
Low	0	0.0	0.0	0	0.0	0.0	
Moderate	1	14.3	10.0	104	1.4	1.1	19.2
Middle	4	57.1	73.3	2,745	35.7	66.6	74.7
Upper	2	28.6	16.7	4,836	62.9	32.3	6.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	7	100.0	100.0	7,685	100.0	100.0	100.0
Total HMDA Reportable Loans							Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	
Moderate	23	9.5	4.9	3,330	6.0	3.7	6.8
Middle	167	68.7	36.6	33,204	59.5	31.4	53.9
Upper	53	21.8	55.5	19,265	34.5	64.9	39.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	243	100.0	100.0	55,799	100.0	100.0	100.0
<i>Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

Distribution of 2020 Small Farm Lending by Revenue Size of Farms					
Assessment Area: Columbus, OH MSA #18140					
	Bank Loans				Total Farms %
	#	%	\$(000)	\$%	
By Revenue					
\$1 Million or Less	83	56.1	17,580	53.9	98.6
Over \$1 Million	23	15.5	13,689	41.9	1.1
Revenue Unknown	42	28.4	1,373	4.2	0.3
Total	148	100.0	32,642	100.0	
By Loan Size					
\$100,000 or Less	96	64.9	3,568	10.9	
\$100,001 - \$250,000	18	12.2	3,165	9.7	
\$250,001 - \$500,000	20	13.5	7,366	22.6	
Total	148	100.0	32,642	100.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or Less	51	61.4	2,074	11.8	
\$100,001 - \$250,000	13	15.7	2,236	12.7	
\$250,001 - \$500,000	14	16.9	4,956	28.2	
Total	83	100.0	17,580	100.0	
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

Distribution of 2020 Small Farm Lending by Income Level of Geography					
Assessment Area: Columbus, OH MSA #18140					
Geographic Income Level	Bank Loans				Total Farms %
	#	%	\$(000)	\$%	
Low	0	0.0	0	0.0	0.0
Moderate	10	6.8	701	2.1	6.0
Middle	114	77.0	23,316	71.4	65.9
Upper	24	16.2	8,625	26.4	28.1
Unknown	0	0.0	0	0.0	0.0
Total	148	100.0	32,642	100.0	100.0
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

Distribution of 2020 Consumer Loans by Borrower Income Level					
Assessment Area: Columbus, OH MSA #15140					
Borrower Income Level	Bank Loans				Households by Household Income %
	#	%	\$(000)	%	
Motor Vehicle Loans					
Low	5	13.5	91	15.6	15.9
Moderate	9	24.3	128	22.0	14.8
Middle	6	16.2	87	14.9	15.7
Upper	5	13.5	106	18.2	53.7
Unknown	12	32.4	171	29.4	0.0
Total	37	100.0	582	100.0	100.0
Other - Secured Loans					
Low	5	14.3	30	5.8	15.9
Moderate	7	20.0	63	12.3	14.8
Middle	4	11.4	36	7.0	15.7
Upper	6	17.1	149	29.0	53.7
Unknown	13	37.1	234	45.6	0.0
Total	35	100.0	513	100.0	100.0
Other - Unsecured Loans					
Low	5	20.0	15	7.9	15.9
Moderate	5	20.0	13	6.8	14.8
Middle	1	4.0	3	1.6	15.7
Upper	1	4.0	100	52.4	53.7
Unknown	13	52.0	61	31.9	0.0
Total	25	100.0	191	100.0	100.0
Total Consumer Loans					
Low	15	15.5	136	10.6	15.9
Moderate	21	21.6	204	15.9	14.8
Middle	11	11.3	126	9.8	15.7
Upper	12	12.4	355	27.6	53.7
Unknown	38	39.2	466	36.2	0.0
Total	97	100.0	1,286	100.0	100.0
Source: 2020 FFIEC Census Data					
2012-2015 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

Distribution of 2020 Consumer Loans by Income Level of Geography Assessment Area: Columbus, OH MSA #18140					
Geographic Income Level	Bank Loans				Households %
	#	#%	\$(000)	\$%	
Motor Vehicle Loans					
Low	0	0.0	0	0.0	0.0
Moderate	4	10.8	74	12.7	9.3
Middle	29	76.4	445	76.5	57.1
Upper	4	10.8	63	10.8	33.7
Unknown	0	0.0	0	0.0	0.0
Total	37	100.0	582	100.0	100.0
Other - Secured Loans					
Low	0	0.0	0	0.0	0.0
Moderate	11	31.4	184	35.9	9.3
Middle	19	54.3	219	42.7	57.1
Upper	5	14.3	110	21.4	33.7
Unknown	0	0.0	0	0.0	0.0
Total	35	100.0	513	100.0	100.0
Other - Unsecured Loans					
Low	0	0.0	0	0.0	0.0
Moderate	7	28.0	22	11.5	9.3
Middle	17	68.0	166	86.9	57.1
Upper	1	4.0	4	2.1	33.7
Unknown	0	0.0	0	0.0	0.0
Total	25	100.0	191	100.0	100.0
Total Consumer Loans					
Low	0	0.0	0	0.0	0.0
Moderate	22	22.7	280	21.8	9.3
Middle	65	67.0	830	64.5	57.1
Upper	10	10.3	177	13.8	33.7
Unknown	0	0.0	0	0.0	0.0
Total	97	100.0	1,286	100.0	100.0
Source: 2020 FFIEC Census Data 2012-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.					

Distribution of 2020 Home Equity Lines of Credit by Borrower Income Level					
Assessment Area: Columbus, OH MSA #18140					
Borrower Income Level	Bank Loans				Families by Family Income %
	#	#%	\$(000)	%	
Low	4	9.8	325	6.4	14.0
Moderate	3	7.3	144	2.8	15.5
Middle	7	17.1	671	13.2	19.0
Upper	16	39.0	3,043	59.9	51.5
Unknown	11	26.8	899	17.7	0.0
Total	41	100.0	5,081	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

Distribution of 2020 Home Equity Lines of Credit by Income Level of Geography					
Assessment Area: Columbus, OH MSA #18140					
Geographic Income Level	Bank Loans				Owner Occupied Units %
	#	#%	\$(000)	%	
Low	0	0.0	0	0.0	0.0
Moderate	7	17.1	501	9.9	6.8
Middle	30	73.2	3,800	74.8	53.9
Upper	4	9.8	780	15.4	39.2
Unknown	0	0.0	0	0.0	0.0
Total	41	100.0	5,081	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

Distribution of 2020 Small Business Lending by Income Level of Geography Assessment Area: Springfield, OH MSA #44220					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
Low	2	0.8	2,904	9.5	4.8
Moderate	14	5.9	2,222	7.3	28.7
Middle	105	43.9	7,073	23.2	36.8
Upper	118	49.4	18,226	59.9	29.6
Unknown	0	0.0	0	0.0	0.0
Total	239	100.0	30,425	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2020 Small Business Lending by Revenue Size of Businesses Assessment Area: Springfield, OH MSA #44220					
	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	45	18.5	6,495	21.4	89.8
Over \$1 Million	11	4.6	8,034	26.4	9.0
Revenue Unknown	183	76.6	15,893	52.2	1.2
Total	239	100.0	30,425	100.0	
By Loan Size					
\$100,000 or Less	178	74.5	5,267	17.3	
\$100,001 - \$250,000	39	16.3	6,462	21.2	
\$250,001 - \$1 Million	18	7.5	11,370	37.4	
Total	239	100.0	30,425	100.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or Less	27	60.0	1,103	17.0	
\$100,001 - \$250,000	12	26.7	2,016	31.0	
\$250,001 - \$1 Million	6	13.3	3,379	52.0	
Total	45	100.0	6,495	100.0	

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2020 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Springfield, OH MSA #44220							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	2	5.4	2.4	128	3.1	2.1	3.1
Moderate	12	32.4	21.4	1,116	26.9	13.4	20.2
Middle	11	29.7	44.6	1,503	36.2	45.7	46.6
Upper	12	32.4	31.6	1,402	33.8	38.8	30.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	37	100.0	100.0	4,149	100.0	100.0	100.0
Refinance Loans							
Low	1	1.4	0.8	67	0.5	0.5	3.1
Moderate	8	10.8	9.9	721	5.9	5.7	20.2
Middle	38	51.4	46.5	5,235	42.5	44.1	46.6
Upper	27	36.5	42.8	6,297	51.1	49.7	30.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	74	100.0	100.0	12,320	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	1.0	0	0.0	1.1	3.1
Moderate	0	0.0	14.6	0	0.0	10.5	20.2
Middle	0	0.0	51.9	0	0.0	51.7	46.6
Upper	0	0.0	32.5	0	0.0	36.7	30.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans							Multifamily Units %
Low	0	0.0	12.5	0	0.0	16.6	
Moderate	4	80.0	56.3	990	40.7	13.2	31.5
Middle	0	0.0	18.8	0	0.0	58.1	35.0
Upper	1	20.0	12.5	1,442	59.3	12.0	22.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	5	100.0	100.0	2,432	100.0	100.0	100.0
Total HMDA Reportable Loans							Owner Occupied Units %
Low	3	2.6	1.6	195	1.0	1.8	
Moderate	24	20.7	16.0	2,827	15.0	9.8	20.2
Middle	49	42.2	45.7	6,738	35.6	45.5	46.6
Upper	40	34.5	36.7	9,141	48.4	43.0	30.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	116	100.0	100.0	18,901	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2020 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Springfield, OH MSA #44220							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	5	13.5	8.1	312	7.5	4.5	20.9
Moderate	2	5.4	24.7	74	1.8	18.9	17.4
Middle	8	21.6	22.7	1,065	25.7	22.1	20.9
Upper	9	24.3	28.9	1,525	36.8	40.3	40.8
Unknown	13	35.1	15.5	1,173	28.3	14.2	0.0
Total	37	100.0	100.0	4,149	100.0	100.0	100.0
Refinance Loans							
Low	7	9.5	4.3	476	3.9	2.2	20.9
Moderate	11	14.9	11.3	1,006	8.2	7.5	17.4
Middle	9	12.2	19.6	923	7.5	15.7	20.9
Upper	42	56.8	43.3	8,774	71.2	49.5	40.8
Unknown	5	6.8	21.5	1,141	9.3	25.1	0.0
Total	74	100.0	100.0	12,320	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	5.8	0	0.0	4.0	20.9
Moderate	0	0.0	16.0	0	0.0	13.2	17.4
Middle	0	0.0	24.8	0	0.0	24.0	20.9
Upper	0	0.0	52.4	0	0.0	57.4	40.8
Unknown	0	0.0	1.0	0	0.0	1.4	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total HMDA Reportable Loans							
Low	12	10.3	5.9	788	4.2	3.2	20.9
Moderate	13	11.2	16.9	1,080	5.7	12.2	17.4
Middle	17	14.7	20.7	1,988	10.5	17.9	20.9
Upper	53	45.7	36.2	10,882	57.6	42.9	40.8
Unknown	21	18.1	20.3	4,163	22.0	23.8	0.0
Total	116	100.0	100.0	18,901	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

Distribution of 2020 Small Farm Lending by Income Level of Geography					
Assessment Area: Springfield, OH MSA #44220					
Geographic Income Level	Bank Loans				Total Farms %
	#	%	\$(000)	%	
Low	0	0.0	0	0.0	0.7
Moderate	0	0.0	0	0.0	4.0
Middle	11	32.4	1,405	8.9	52.3
Upper	23	67.6	14,332	91.1	43.0
Unknown	0	0.0	0	0.0	0.0
Total	34	100.0	15,737	100.0	100.0
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.					

Distribution of 2020 Small Farm Lending by Revenue Size of Farms					
Assessment Area: Springfield, OH MSA #44220					
	Bank Loans				Total Farms %
	#	%	\$(000)	%	
By Revenue					
\$1 Million or Less	20	58.8	4,543	28.9	96.6
Over \$1 Million	5	14.7	9,825	62.4	3.4
Revenue Unknown	9	26.5	1,368	8.7	0.0
Total	34	100.0	15,737	100.0	
By Loan Size					
\$100,000 or Less	18	52.9	639	4.1	
\$100,001 - \$250,000	5	14.7	861	5.5	
\$250,001 - \$500,000	4	11.8	1,213	7.7	
Total	34	100.0	15,737	100.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or Less	10	50.0	395	8.7	
\$100,001 - \$250,000	4	20.0	711	15.7	
\$250,001 - \$500,000	3	15.0	863	19.0	
Total	20	100.0	4,543	100.0	
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.					

Distribution of 2020 Small Business Lending by Revenue Size of Businesses					
Assessment Area: Nonmetropolitan Ohio					
	Bank Loans				Total Businesses %
	#	%	\$(000)	\$%	
By Revenue					
\$1 Million or Less	26	7.7	2,505	16.2	90.1
Over \$1 Million	4	1.2	1,067	6.9	7.5
Revenue Unknown	308	91.1	11,894	76.9	2.4
Total	338	100.0	15,466	100.0	
By Loan Size					
\$100,000 or Less	298	88.2	6,217	40.2	
\$100,001 - \$250,000	27	8.0	4,289	27.7	
\$250,001 - \$1 Million	13	3.8	4,959	32.1	
Total	338	100.0	15,466	100.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or Less	18	69.2	653	26.1	
\$100,001 - \$250,000	7	26.9	1,344	53.7	
\$250,001 - \$1 Million	1	3.8	508	20.3	
Total	26	100.0	2,505	100.0	
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2012-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.					

Distribution of 2020 Small Business Lending by Income Level of Geography					
Assessment Area: Nonmetropolitan Ohio					
Geographic Income Level	Bank Loans				Total Businesses %
	#	%	\$(000)	\$%	
Low	0	0.0	0	0.0	0.0
Moderate	2	0.6	665	4.3	11.1
Middle	233	68.9	12,130	78.4	63.7
Upper	103	30.5	2,671	17.3	25.2
Unknown	0	0.0	0	0.0	0.0
Total	338	100.0	15,466	100.0	100.0
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2012-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.					

Distribution of 2020 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Nonmetropolitan Ohio							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	5.7	0	0.0	3.1	17.9
Moderate	5	33.3	23.5	525	25.0	17.4	15.6
Middle	5	33.3	22.4	572	27.3	21.0	22.6
Upper	4	26.7	29.5	847	40.4	40.8	43.8
Unknown	1	6.7	18.9	152	7.3	17.7	0.0
Total	15	100.0	100.0	2,096	100.0	100.0	100.0
Refinance Loans							
Low	3	6.7	3.6	252	3.2	1.9	17.9
Moderate	8	17.8	12.5	602	7.7	8.0	15.6
Middle	9	20.0	23.3	1,089	14.0	19.5	22.6
Upper	23	51.1	42.2	5,633	72.2	50.0	43.8
Unknown	2	4.4	18.4	222	2.8	20.6	0.0
Total	45	100.0	100.0	7,798	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	3.2	0	0.0	1.3	17.9
Moderate	0	0.0	17.1	0	0.0	16.2	15.6
Middle	0	0.0	19.0	0	0.0	18.8	22.6
Upper	2	100.0	59.5	57	100.0	58.6	43.8
Unknown	0	0.0	1.3	0	0.0	5.2	0.0
Total	2	100.0	100.0	57	100.0	100.0	100.0
Total HMDA Reportable Loans							
Low	4	6.0	4.3	312	3.0	2.3	17.9
Moderate	16	23.9	16.5	1,248	12.0	11.6	15.6
Middle	14	20.9	22.4	1,661	16.0	19.4	22.6
Upper	30	44.8	37.5	6,781	65.4	44.9	43.8
Unknown	3	4.5	19.3	374	3.6	21.8	0.0
Total	67	100.0	100.0	10,376	100.0	100.0	100.0
<i>Sources: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.</i>							

Distribution of 2020 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Nonmetropolitan Ohio							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	#%	\$(000)	%	\$%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	10.4	0	0.0	8.0	8.2
Middle	11	73.3	64.8	1,575	75.1	63.1	61.5
Upper	4	26.7	24.7	521	24.9	28.9	30.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	15	100.0	100.0	2,096	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	6	13.3	5.7	1,535	19.7	4.4	8.2
Middle	23	51.1	58.8	3,394	43.5	57.3	61.5
Upper	16	35.6	35.5	2,869	36.8	38.3	30.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	45	100.0	100.0	7,798	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	10.8	0	0.0	9.3	8.2
Middle	0	0.0	64.6	0	0.0	64.9	61.5
Upper	2	100.0	24.7	57	100.0	25.8	30.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	2	100.0	100.0	57	100.0	100.0	100.0
Multifamily Loans							Multifamily Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	25.0	0	0.0	54.7	46.8
Middle	2	100.0	62.5	304	100.0	37.3	47.3
Upper	0	0.0	12.5	0	0.0	8.0	5.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	2	100.0	100.0	304	100.0	100.0	100.0
Total HMDA Reportable Loans							Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	6	9.0	7.8	1,535	14.8	7.3	8.2
Middle	38	56.7	61.3	5,314	51.2	59.3	61.5
Upper	23	34.3	30.9	3,527	34.0	33.4	30.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	67	100.0	100.0	10,376	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2020 Small Farm Lending by Revenue Size of Farms					
Assessment Area: Nonmetropolitan Ohio					
	Bank Loans				Total Farms %
	#	#%	\$(000)	\$%	
By Revenue					
\$1 Million or Less	11	27.5	3,647	54.2	97.8
Over \$1 Million	3	7.5	571	8.5	1.1
Revenue Unknown	26	65.0	2,511	37.3	1.1
Total	40	100.0	6,730	100.0	
By Loan Size					
\$100,000 or Less	26	65.0	830	12.3	
\$100,001 - \$250,000	6	15.0	1,041	15.5	
\$250,001 - \$500,000	5	12.5	1,651	24.5	
Total	40	100.0	6,730	100.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or Less	5	45.5	109	3.0	
\$100,001 - \$250,000	2	18.2	310	8.5	
\$250,001 - \$500,000	2	18.2	691	18.9	
Total	11	100.0	3,647	100.0	
<i>Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

Distribution of 2020 Small Farm Lending by Income Level of Geography					
Assessment Area: Nonmetropolitan Ohio					
Geographic Income Level	Bank Loans				Total Farms %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	0.0
Moderate	2	5.0	42	0.6	2.0
Middle	16	40.0	2,174	32.3	61.1
Upper	22	55.0	4,514	67.1	37.0
Unknown	0	0.0	0	0.0	0.0
Total	40	100.0	6,730	100.0	100.0
<i>Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

Distribution of 2020 Consumer Loans by Borrower Income Level					
Assessment Area: Nonmetropolitan Ohio					
Borrower Income Level	Bank Loans				Households by Household Income %
	#	%	\$(000)	%	
Low	3	9.7	14	3.0	19.2
Moderate	5	16.1	28	6.0	15.3
Middle	4	12.9	25	5.4	18.3
Upper	5	16.1	250	53.5	47.1
Unknown	14	45.2	152	32.5	0.0
Total	31	100.0	467	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2020 Consumer Loans by Income Level of Geography					
Assessment Area: Nonmetropolitan Ohio					
Geographic Income Level	Bank Loans				Households %
	#	%	\$(000)	%	
Low	0	0.0	0	0.0	0.0
Moderate	1	3.2	7	1.5	11.7
Middle	26	83.9	421	90.1	61.8
Upper	4	12.9	40	8.6	26.5
Unknown	0	0.0	0	0.0	0.0
Total	31	100.0	467	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Columbus, OH MSA #18140							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	4	8.7	3.2	510	5.6	1.5	14.0
Moderate	13	28.3	12.9	1,741	19.0	8.1	15.5
Middle	16	34.8	20.0	2,916	31.8	16.7	19.0
Upper	13	28.3	50.3	3,997	43.6	60.8	51.5
Unknown	0	0.0	13.7	0	0.0	12.8	0.0
Total	46	100.0	100.0	9,164	100.0	100.0	100.0
Refinance Loans							
Low	8	21.1	4.0	526	8.6	1.9	14.0
Moderate	8	21.1	11.2	778	12.6	6.9	15.5
Middle	9	23.7	19.0	1,423	23.1	15.6	19.0
Upper	11	28.9	50.5	2,903	47.2	57.7	51.5
Unknown	2	5.3	15.3	521	8.5	17.9	0.0
Total	38	100.0	100.0	6,151	100.0	100.0	100.0
Home Improvement Loans							
Low	1	33.3	4.1	60	28.3	2.9	14.0
Moderate	0	0.0	13.2	0	0.0	11.1	15.5
Middle	0	0.0	20.3	0	0.0	17.4	19.0
Upper	1	33.3	59.6	16	7.5	65.4	51.5
Unknown	1	33.3	2.8	136	64.2	3.1	0.0
Total	3	100.0	100.0	212	100.0	100.0	100.0
Total HMDA Reportable Loans							
Low	14	14.1	3.6	1,103	5.5	1.6	14.0
Moderate	24	24.2	12.0	2,667	13.3	7.4	15.5
Middle	28	28.3	19.3	4,646	23.2	15.6	19.0
Upper	25	25.3	51.0	6,916	34.6	57.2	51.5
Unknown	8	8.1	14.0	4,675	23.4	18.2	0.0
Total	99	100.0	100.0	20,007	100.0	100.0	100.0
Source: 2019 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

Distribution of 2019 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Columbus, OH MSA #18140							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	10	21.7	7.5	1,567	17.1	5.5	6.8
Middle	29	63.0	40.4	6,649	72.6	33.5	53.9
Upper	7	15.2	52.1	948	10.3	60.9	39.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	46	100.0	100.0	9,164	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	7	18.4	4.9	1,135	18.5	3.6	6.8
Middle	22	57.9	40.4	3,262	53.0	32.9	53.9
Upper	9	23.7	54.7	1,754	28.5	63.5	39.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	38	100.0	100.0	6,151	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	66.7	5.0	152	71.7	6.2	6.8
Middle	1	33.3	44.4	60	28.3	41.9	53.9
Upper	0	0.0	50.6	0	0.0	51.9	39.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	3	100.0	100.0	212	100.0	100.0	100.0
Multifamily Loans							Multifamily Units %
Low	0	0.0	0.0	0	0.0	0.0	
Moderate	1	20.0	33.3	350	8.7	25.8	19.2
Middle	3	60.0	44.4	1,509	37.6	8.9	74.7
Upper	1	20.0	22.2	2,159	53.7	65.3	6.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	5	100.0	100.0	4,018	100.0	100.0	100.0
Total HMDA Reportable Loans							Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	
Moderate	23	23.2	6.2	3,296	16.5	5.5	6.8
Middle	57	57.6	40.9	11,665	58.3	32.6	53.9
Upper	19	19.2	53.0	5,046	25.2	61.8	39.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	99	100.0	100.0	20,007	100.0	100.0	100.0
Source: 2019 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2019 HMDA Reportable Loans by Income Level of Geography Assessment Area: Springfield, OH MSA #44220							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	1	2.9	1.0	22	0.4	0.3	3.1
Moderate	8	22.9	20.4	423	7.9	12.3	20.2
Middle	9	25.7	45.2	838	15.7	46.5	46.6
Upper	17	48.6	33.4	4,068	76.0	40.8	30.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	35	100.0	100.0	5,351	100.0	100.0	100.0
Refinance Loans							
Low	1	3.6	1.2	22	0.5	0.6	3.1
Moderate	2	7.1	10.6	118	2.9	5.7	20.2
Middle	11	39.3	48.0	1,552	37.8	47.3	46.6
Upper	14	50.0	40.2	2,409	58.7	46.4	30.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	28	100.0	100.0	4,101	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	1.9	0	0.0	1.3	3.1
Moderate	0	0.0	12.0	0	0.0	8.2	20.2
Middle	1	50.0	45.9	27	44.3	44.3	46.6
Upper	1	50.0	40.2	34	55.7	46.2	30.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	2	100.0	100.0	61	100.0	100.0	100.0
Multifamily Loans							Multifamily Units %
Low	0	0.0	0.0	0	0.0	0.0	
Moderate	2	100.0	83.3	1,167	100.0	45.5	31.5
Middle	0	0.0	16.7	0	0.0	54.5	35.0
Upper	0	0.0	0.0	0	0.0	0.0	22.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	2	100.0	100.0	1,167	100.0	100.0	100.0
Total HMDA Reportable Loans							Owner Occupied Units %
Low	2	2.8	1.3	44	0.4	0.5	
Moderate	12	16.9	17.4	1,708	15.5	10.7	20.2
Middle	21	29.6	45.9	2,417	22.0	46.5	46.6
Upper	36	50.7	35.5	6,823	62.1	42.3	30.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	71	100.0	100.0	10,992	100.0	100.0	100.0
<p>Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>							

Distribution of 2019 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Springfield, OH MSA #44220							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	1	2.9	8.0	81	1.5	4.4	20.9
Moderate	4	11.4	24.3	290	5.4	18.2	17.4
Middle	7	20.0	22.8	658	12.3	22.4	20.9
Upper	17	48.6	28.6	3,973	74.2	40.4	40.8
Unknown	6	17.1	16.4	349	6.5	14.6	0.0
Total	35	100.0	100.0	5,351	100.0	100.0	100.0
Refinance Loans							
Low	1	3.6	7.8	22	0.5	3.8	20.9
Moderate	5	17.9	14.7	675	16.5	10.6	17.4
Middle	5	17.9	21.2	547	13.3	18.2	20.9
Upper	16	57.1	39.5	2,813	68.6	46.9	40.8
Unknown	1	3.6	16.8	44	1.1	20.5	0.0
Total	28	100.0	100.0	4,101	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	6.0	0	0.0	5.1	20.9
Moderate	1	50.0	16.2	34	55.7	12.8	17.4
Middle	1	50.0	23.7	27	44.3	18.9	20.9
Upper	0	0.0	52.3	0	0.0	62.3	40.8
Unknown	0	0.0	1.9	0	0.0	0.9	0.0
Total	2	100.0	100.0	61	100.0	100.0	100.0
Total HMDA Reportable Loans							
Low	4	5.6	7.7	185	1.7	4.2	20.9
Moderate	10	14.1	19.8	999	9.1	15.1	17.4
Middle	13	18.3	22.0	1,232	11.2	20.5	20.9
Upper	35	49.3	33.4	7,016	63.8	42.3	40.8
Unknown	9	12.7	17.1	1,560	14.2	18.0	0.0
Total	71	100.0	100.0	10,992	100.0	100.0	100.0

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2019 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Nonmetropolitan Ohio							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	5.5	0	0.0	3.0	17.9
Moderate	6	24.0	18.8	578	14.0	14.0	15.6
Middle	4	16.0	23.9	426	10.3	21.3	22.6
Upper	13	52.0	37.3	3,027	73.1	45.2	43.8
Unknown	2	8.0	14.5	112	2.7	16.5	0.0
Total	25	100.0	100.0	4,143	100.0	100.0	100.0

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2019 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Nonmetropolitan Ohio							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	4.0	8.6	500	12.1	6.7	8.2
Middle	16	64.0	61.6	2,527	61.0	60.3	61.5
Upper	8	32.0	29.7	1,116	26.9	33.0	30.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	25	100.0	100.0	4,143	100.0	100.0	100.0

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2018 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Columbus, OH MSA #18140							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	3	7.1	2.8	188	3.1	1.4	14.0
Moderate	10	23.8	13.3	1,099	17.9	8.3	15.5
Middle	8	19.0	19.7	1,196	19.5	16.9	19.0
Upper	14	33.3	50.2	2,873	46.8	61.0	51.5
Unknown	7	16.7	14.0	786	12.8	12.4	0.0
Total	42	100.0	100.0	6,142	100.0	100.0	100.0
Refinance Loans							
Low	3	17.6	5.9	171	5.8	3.3	14.0
Moderate	5	29.4	16.4	546	18.5	11.9	15.5
Middle	5	29.4	22.3	671	22.8	20.5	19.0
Upper	2	11.8	46.5	395	13.4	54.1	51.5
Unknown	2	11.8	8.9	1,163	39.5	10.2	0.0
Total	17	100.0	100.0	2,946	100.0	100.0	100.0
Home Improvement Loans							
Low	1	16.7	3.0	10	3.1	2.1	14.0
Moderate	3	50.0	11.1	268	83.0	8.7	15.5
Middle	1	16.7	20.2	30	9.3	16.7	19.0
Upper	1	16.7	59.9	15	4.6	65.9	51.5
Unknown	0	0.0	5.8	0	0.0	6.6	0.0
Total	6	100.0	100.0	323	100.0	100.0	100.0
Total HMDA Reportable Loans							
Low	7	9.6	3.6	369	3.6	1.8	14.0
Moderate	20	27.4	13.7	2,025	19.7	8.8	15.5
Middle	15	20.5	20.1	1,924	18.7	16.9	19.0
Upper	22	30.1	49.6	4,038	39.2	56.8	51.5
Unknown	9	12.3	13.0	1,949	18.9	15.8	0.0
Total	73	100.0	100.0	10,305	100.0	100.0	100.0

Source: 2018 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2018 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Columbus, OH MSA #18140							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	5	11.9	7.0	519	8.5	5.0	6.8
Middle	32	76.2	39.8	4,602	74.9	32.5	53.9
Upper	5	11.9	53.2	1,021	16.6	62.5	39.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	42	100.0	100.0	6,142	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	7	41.2	5.1	691	23.5	4.0	6.8
Middle	7	41.2	47.3	877	29.8	39.4	53.9
Upper	3	17.6	47.6	1,378	46.8	56.7	39.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	17	100.0	100.0	2,946	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	16.7	3.8	30	9.3	3.8	6.8
Middle	4	66.7	42.0	278	86.1	35.9	53.9
Upper	1	16.7	54.3	15	4.6	60.3	39.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	6	100.0	100.0	323	100.0	100.0	100.0
Multifamily Loans							Multifamily Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	20.0	0	0.0	2.5	19.2
Middle	0	0.0	40.0	0	0.0	12.1	74.7
Upper	0	0.0	40.0	0	0.0	85.4	6.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total HMDA Reportable Loans							Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	16	21.9	6.0	1,619	15.7	4.6	6.8
Middle	47	64.4	42.1	6,122	59.4	33.4	53.9
Upper	10	13.7	51.9	2,564	24.9	62.0	39.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	73	100.0	100.0	10,305	100.0	100.0	100.0
Source: 2018 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2018 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Nonmetropolitan Ohio							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	1	4.8	6.5	50	2.1	3.4	18.7
Moderate	3	14.3	20.1	189	7.9	14.8	15.1
Middle	6	28.6	26.9	691	28.8	24.0	22.4
Upper	11	52.4	34.4	1,467	61.2	41.4	43.7
Unknown	0	0.0	12.1	0	0.0	16.3	0.0
Total	21	100.0	100.0	2,397	100.0	100.0	100.0

Source: 2018 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2018 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Nonmetropolitan Ohio							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	9.5	9.6	132	5.5	12.4	8.4
Middle	14	66.7	55.4	1,290	53.8	51.1	54.8
Upper	5	23.8	35.0	975	40.7	36.5	36.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	21	100.0	100.0	2,397	100.0	100.0	100.0

Source: 2018 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2017 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Columbus, OH MSA #18140							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	6	11.8	3.5	605	6.5	1.6	14.0
Moderate	7	13.7	13.0	1,062	11.4	8.0	15.5
Middle	12	23.5	20.2	1,678	18.0	16.8	19.0
Upper	24	47.1	50.5	5,556	59.5	62.0	51.5
Unknown	2	3.9	12.8	430	4.6	11.7	0.0
Total	51	100.0	100.0	9,331	100.0	100.0	100.0
Refinance Loans							
Low	3	12.5	4.7	221	6.4	2.5	14.0
Moderate	3	12.5	12.8	347	10.0	8.0	15.5
Middle	3	12.5	20.4	289	8.3	16.4	19.0
Upper	13	54.2	47.2	2,307	66.4	57.9	0.0
Unknown	2	8.3	14.9	312	9.0	15.3	0.0
Total	24	100.0	100.0	3,476	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	5.4	0	0.0	3.2	14.0
Moderate	4	40.0	19.0	296	25.8	15.8	15.5
Middle	2	20.0	18.5	203	17.7	16.6	19.0
Upper	4	40.0	55.4	650	56.6	61.4	0.0
Unknown	0	0.0	1.7	0	0.0	3.0	0.0
Total	10	100.0	100.0	1,149	100.0	100.0	100.0
Total HMDA Reportable Loans							
Low	9	10.6	3.9	826	5.9	1.8	14.0
Moderate	14	16.5	13.2	1,705	12.2	7.9	15.5
Middle	17	20.0	20.2	2,170	15.5	16.2	19.0
Upper	41	48.2	49.7	8,513	61.0	59.2	0.0
Unknown	4	4.7	13.0	742	5.3	14.9	0.0
Total	85	100.0	100.0	13,956	100.0	100.0	100.0
Source: 2017 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

Distribution of 2017 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Columbus, OH MSA #18140							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	11	21.6	6.3	1,830	19.6	4.4	6.8
Middle	34	66.7	38.9	6,168	66.1	30.7	53.9
Upper	6	11.8	54.9	1,333	14.3	64.9	39.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	51	100.0	100.0	9,331	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	3	12.5	5.6	362	10.4	3.5	6.8
Middle	18	75.0	46.0	2,496	71.8	36.2	53.9
Upper	3	12.5	48.5	618	17.8	60.3	39.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	24	100.0	100.0	3,476	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	10.0	6.0	18	1.6	4.0	6.8
Middle	6	60.0	48.3	712	62.0	43.8	53.9
Upper	3	30.0	45.7	419	36.5	52.2	39.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	10	100.0	100.0	1,149	100.0	100.0	100.0
Multifamily Loans							Multifamily Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	27.3	0	0.0	29.4	19.2
Middle	0	0.0	63.6	0	0.0	37.2	74.7
Upper	0	0.0	9.1	0	0.0	33.5	6.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total HMDA Reportable Loans							Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	15	17.6	6.1	2,210	15.8	4.8	6.8
Middle	58	68.2	41.4	9,376	67.2	32.6	53.9
Upper	12	14.1	52.5	2,370	17.0	62.6	39.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	85	100.0	100.0	13,956	100.0	100.0	100.0
Source: 2017 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2017 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Nonmetropolitan Ohio							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	5.8	0	0.0	3.2	18.7
Moderate	1	7.1	20.0	28	2.2	14.3	15.1
Middle	5	35.7	24.1	548	43.2	23.2	22.4
Upper	6	42.9	35.8	509	40.1	43.7	43.7
Unknown	2	14.3	14.3	184	14.5	15.6	0.0
Total	14	100.0	100.0	1,269	100.0	100.0	100.0

Source: 2017 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2017 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Nonmetropolitan Ohio							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	7.1	10.2	84	6.6	8.2	8.4
Middle	6	42.9	53.3	277	21.8	51.0	54.8
Upper	7	50.0	36.5	908	71.6	40.9	36.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	14	100.0	100.0	1,269	100.0	100.0	100.0

Source: 2017 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2016 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Columbus, OH MSA #18140							
Borrower Income Level	Bank and Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank			Agg
	#	#%	#%	\$(000)	\$%		\$%
Home Purchase Loans							
Low	5	20.0	3.0	281	7.5	1.4	13.4
Moderate	5	20.0	12.7	470	12.6	7.8	13.4
Middle	5	20.0	19.0	868	23.3	15.3	20.1
Upper	9	36.0	52.8	2,049	54.9	64.2	53.1
Unknown	1	4.0	12.6	65	1.7	11.4	0.0
Total	25	100.0	100.0	3,733	100.0	100.0	100.0
Refinance Loans							
Low	1	3.3	3.7	115	2.0	2.1	13.4
Moderate	6	20.0	8.3	650	11.3	4.5	13.4
Middle	7	23.3	15.0	1,025	17.9	11.4	20.1
Upper	13	43.3	58.1	3,454	60.2	66.7	0.0
Unknown	3	10.0	15.0	498	8.7	15.4	0.0
Total	30	100.0	100.0	5,742	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	3.4	0	0.0	3.3	13.4
Moderate	0	0.0	10.5	0	0.0	6.5	13.4
Middle	0	0.0	20.5	0	0.0	17.4	20.1
Upper	0	0.0	61.6	0	0.0	69.0	0.0
Unknown	0	0.0	4.0	0	0.0	3.9	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total HMDA Reportable Loans							
Low	6	10.7	3.3	396	4.0	1.6	13.4
Moderate	11	19.6	10.7	1,120	11.4	6.3	13.4
Middle	12	21.4	17.3	1,893	19.2	13.5	20.1
Upper	22	39.3	55.3	5,503	55.9	64.0	0.0
Unknown	5	8.9	13.4	937	9.5	14.6	0.0
Total	56	100.0	100.0	9,849	100.0	100.0	100.0
Source: 2016 FFIEC Census Data							
2006-2010 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

Distribution of 2016 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Columbus, OH MSA #18140							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	4.0	4.2	236	6.3	3.4	3.5
Middle	15	60.0	25.2	1,914	51.3	18.3	36.2
Upper	9	36.0	70.6	1,583	42.4	78.3	60.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	25	100.0	100.0	3,733	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	3.3	2.4	232	4.0	1.5	3.5
Middle	16	53.3	24.6	2,395	41.7	18.4	36.2
Upper	13	43.3	73.0	3,115	54.2	80.1	60.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	30	100.0	100.0	5,742	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	1.4	0	0.0	0.3	3.5
Middle	0	0.0	29.5	0	0.0	20.9	36.2
Upper	0	0.0	69.0	0	0.0	78.8	60.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans							Multifamily Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	100.0	44.4	374	100.0	56.4	21.1
Middle	0	0.0	22.2	0	0.0	15.1	45.7
Upper	0	0.0	33.3	0	0.0	28.5	33.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	374	100.0	100.0	100.0
Total HMDA Reportable Loans							Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	3	5.4	3.4	842	8.5	3.6	3.5
Middle	31	55.4	25.1	4,309	43.8	18.3	36.2
Upper	22	39.3	71.5	4,698	47.7	78.0	60.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	56	100.0	100.0	9,849	100.0	100.0	100.0
Source: 2016 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2016 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Nonmetropolitan Ohio							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	4.6	0	0.0	2.5	19.9
Moderate	2	10.5	18.2	74	3.6	12.7	15.7
Middle	5	26.3	23.5	430	20.6	19.4	21.9
Upper	10	52.6	37.5	1,469	70.5	46.4	42.5
Unknown	2	10.5	16.4	110	5.3	19.0	0.0
Total	19	100.0	100.0	2,083	100.0	100.0	100.0

Source: 2016 FFIEC Census Data
2006-2010 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2016 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Nonmetropolitan Ohio							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	10.5	9.1	273	13.1	8.7	9.2
Middle	11	57.9	69.3	1,147	55.1	67.6	69.7
Upper	6	31.6	21.7	663	31.8	23.7	21.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	19	100.0	100.0	2,083	100.0	100.0	100.0

Source: 2016 FFIEC Census Data
2006-2010 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Appendix D – Glossary of Terms

Aggregate lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/AA.

Census tract: A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community development: 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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1.0 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

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, home equity lines of credit, 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 nonrelatives 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 is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, 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 do 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 applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

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 is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-income: Individual income that is 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 metropolitan area/AA.

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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.

Other products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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

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

Rated area: A rated area is a state or multistate metropolitan 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 area, the institution will receive a rating for the multistate metropolitan 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 \$1.0 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial 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 Reports 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.

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