

# **PUBLIC DISCLOSURE**

January 31, 2022

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

First Bank of Berne  
RSSD# 312244

222 Heritage Trail  
Berne, IN 46711

Federal Reserve Bank of Chicago

230 South LaSalle Street  
Chicago, Illinois 60604-1413

**NOTE:** This document is an evaluation of this bank'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 bank. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial bank.

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## INSTITUTION'S CRA RATING

**First Bank of Berne is rated: Satisfactory**

**The Lending Test is rated: Satisfactory**

**The Community Development Test is rated: Satisfactory**

First Bank of Berne is meeting the credit needs of its community based on an analysis of lending and community development activities, and local economic conditions of its assessment areas. The loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, and assessment area credit needs. A majority of loans are originated in the bank's assessment areas. The geographic distribution of loans reflects reasonable dispersion throughout the assessment areas and loan distribution reflects reasonable penetration among individuals of different income levels, including low- and moderate-income, and businesses and farms of different sizes. Neither First Bank of Berne nor this Reserve Bank have received any Community Reinvestment Act (CRA)-related complaints since the previous evaluation.

The bank's community development performance demonstrates adequate responsiveness to the community development needs of the assessment areas through community development loans, qualified investments and donations, and community development services considering the bank's capacity and the availability of such opportunities for community development in the bank's assessment areas.

## SCOPE OF EXAMINATION

First Bank of Berne's CRA performance was evaluated using the Intermediate Small Institution Examination Procedures issued by the Federal Financial Institutions Examinations Council (FFIEC). The CRA performance evaluation was conducted within the context of information about the institution and its assessment area including asset size, financial condition, competition, and economic and demographic characteristics.

The evaluation consisted of a full-scope review of the bank's Eastern Indiana Non-Metropolitan Statistical Area (Non-MSA) and Kokomo, IN MSA #29020 in the state of Indiana, as well as the Ohio Non-MSA in the state of Ohio. The evaluation consisted of three full-scope reviews based on deposit market share; branch concentration; volume of home mortgage lending; small business and small farm lending and an evaluation of the needs of assessment area communities.

The evaluation also consisted of a limited-scope review in the bank's Western Indiana Non-MSA located in the state of Indiana. The state of Indiana received greater weight than the state of Ohio due to the bank's branch concentration, volume of Home Mortgage Disclosure Act (HMDA)-reportable lending, small business and small farm lending, and community credit needs. The bank's level of community development activities was also evaluated.

Products reviewed included HMDA-reportable loans originated from January 1, 2019, through December 31, 2020, and small business and small farm loans originated from November 1, 2020,

through October 31, 2021. The lending analysis was driven by the bank's 2020 Home Mortgage Disclosure Act (HMDA) and the 2021 small business and small farm loans. Note, 2019 HMDA-reportable loans were used strictly for comparison purposes, while the 2020 small business and small farm loan figures carried minimal weight in the analysis. Please refer to Appendix B for the 2019 HMDA-reportable loan tables and Appendix C for the 2020 small business and small farm loans loan tables.

Performance within the designated assessment areas was evaluated using intermediate-small bank examination procedures based on the following performance criteria:

- ***Loan-to-Deposit Ratio*** – A 13-quarter average loan-to-deposit ratio was calculated for the bank and compared to a sample of local competitors;
- ***Lending in the Assessment Area*** – The bank's HMDA-reportable loans originated from January 1, 2019, through December 31, 2020, and small business and small farm loans originated from November 1, 2020, through October 31, 2021, were reviewed to determine the percentage of loans originated within the assessment area;
- ***Geographic Distribution of Lending in the Assessment Area*** – The bank's HMDA-reportable loans originated from January 1, 2019, through December 31, 2020, and small business and small farm loans originated within the assessment area, from November 1, 2020, through October 31, 2021, were analyzed to determine the extent to which the bank is making loans in geographies of different income levels, particularly those designated as low- and moderate-income.
- ***Lending to Borrowers of Different Income and to Businesses and Farms of Different Sizes*** – The bank's HMDA-reportable loans originated from January 1, 2019 through December 31, 2020 and small business and small farm loans originated within the assessment area from November 1, 2020 through October 31, 2021, were reviewed to determine the distribution among borrowers of different income levels, particularly those considered low- or moderate-income, and to businesses and farms of different revenue sizes levels;
- ***Response to Substantiated Complaints*** – Complaints were reviewed to determine if any were related to the bank's record of helping to meet community credit needs and its responses to any received were evaluated for appropriateness.
- ***Community Development Activities*** – The bank's responsiveness to community development needs through community development loans, qualified investments, and community development services, from January 8, 2019, through January 31, 2022, were reviewed considering the capacity, need, and availability of such opportunities within the assessment area.

In addition, three community representatives were contacted in connection with this examination to provide information regarding local economic and socio-economic conditions in the assessment area. Organizations focusing on economic development and affordable housing were contacted. Representatives shared information specifically about economic development and housing conditions.

## DESCRIPTION OF ASSESSMENT AREA

First Bank of Berne is an interstate institution whose combined assessment area consists of four designated assessment areas in two states: Eastern Indiana Non-MSA (Adams, Jay, and Wells Counties in their entirety), Kokomo, Indiana MSA #29020 in its entirety (Howard County in its entirety), and Western Indiana Non-MSA (Miami County in its entirety). In addition, one assessment area in Ohio Non-MSA (Van Wert County in its entirety). The bank’s Eastern Indiana Non-MSA assessment area has changed since the previous evaluation, which is discussed in detail within the assessment area review.

| Description of Individual Assessment Areas |                         |                       |
|--|-------------------------|-----------------------|
| Scope                                      | Assessment Area         | Counties              |
| Full                                       | Eastern Indiana Non-MSA | Adams, Jay, and Wells |
| Full                                       | Kokomo, IN MSA 29020    | Howard                |
| Full                                       | Ohio Non-MSA            | Van Wert              |
| Limited                                    | Western Indiana Non-MSA | Miami                 |

## DESCRIPTION OF INSTITUTION

First Bank of Berne is headquartered in Berne, Indiana and is a wholly owned subsidiary of First Berne Financial, a one-bank holding company also located in Berne, Indiana. The bank operates in northeastern Indiana and northwestern Ohio. First Bank of Berne operates seven full-service branch locations and cash-only ATM’s, six of which are located in northeastern Indiana and one branch is in Van Wert, Ohio. The bank’s Berne, Indiana branch serves as the main office. Since the previous evaluation, the bank closed one full-service branch, a limited-service branch, and one cash-only ATM in middle-income census tracts in Berne, Indiana.

As of the September 30, 2021 Uniform Banking Performance Report (UBPR), the bank reported total assets of approximately \$1.0 billion. First Bank of Berne offers a variety of traditional lending products including agricultural, commercial, residential real estate and consumer loans. The bank is primarily an agricultural and residential lender, as these categories represent approximately 50.1 and 26.4 percent of the gross loan portfolio, respectively. In addition to its lending activities, the bank offers standard, traditional deposit products including checking, savings, money market deposit, and certificates of deposit accounts to meet the personal and business banking needs of its communities. Details of the bank’s loan portfolio is provided in the following table.

| <b>Composition of Loan Portfolio<br/>as of September 30, 2021</b>     |                |              |
|---|----------------|--------------|
| (000's)   |                |              |
| Loan Type   | \$             | %            |
| Residential Real Estate   | 167,683        | 26.4         |
| Commercial  | 125,376        | 19.8         |
| Agriculture   | 317,728        | 50.1         |
| Consumer  | 6,054          | 1.0          |
| Other   | 17,368         | 2.7          |
| <b>Total</b>  | <b>634,209</b> | <b>100.0</b> |
| <i>Note: Percentages may not total 100.0 percent due to rounding.</i> |                |              |

There are no known legal, financial, or other factors impeding the bank’s ability to help meet the credit needs in its communities.

The bank was rated **satisfactory** under the CRA at its previous evaluation conducted on January 7, 2019.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

The bank’s lending and community development test performance in Indiana were given the greatest weight in the overall ratings based on the percentage of HMDA-reportable, small business and small farm loan volume, the size and breadth of the branch network, and total deposits in the state.

### LENDING TEST

First Bank of Berne’s performance relative to the lending test is **Satisfactory**. The loan-to-deposit ratio is reasonable given the bank’s size, financial condition, and assessment area credit needs. A majority of loans and other lending-related activities are in the assessment area. The geographic distribution of loans reflects reasonable dispersion throughout the assessment area. In addition, loan distribution reflects reasonable penetration among individuals of different income levels, including low- and moderate-income, and businesses and farms of different sizes.

### Loan-to-Deposit Ratio

First Bank of Berne maintains a reasonable loan-to-deposit (LTD) ratio given the bank's size, financial condition, and the credit needs of its assessment areas. As of September 30, 2021, the bank’s 13-quarter average LTD was 85.4 percent which was comparable to local competitors, based on similar asset size and geographical location.

The LTD was evaluated given the bank’s size, financial condition, the credit needs of its assessment areas, taking into account, as appropriate, other lending-related activities such as loan originations for sale to the secondary markets and community development loans and qualified investments.

| <b>Comparative Loan-to-Deposit Ratios<br/>as of September 30, 2021</b> |                                 |
|--|---------------------------------|
| <b>Comparative Data</b>  | <b>13 - Quarter Average (%)</b> |
| First Bank of Berne  | 85.4                            |
| Peer Avg – Local   | 85.1                            |
| <b>Competitors</b>   |                                 |
| Community First Bank   | 94.0                            |
| First Farmers Bank & Trust   | 89.2                            |
| Farmers & Merchant State Bank  | 85.4                            |
| First Merchants Bank   | 83.5                            |
| Van Wert First Savings Bank  | 73.2                            |

### **Assessment Area Concentration**

During the evaluation period, First Bank of Berne made a majority of its HMDA-reportable, small business and small farm loans in the bank’s assessment area. Overall, the bank originated 83.9 percent, by number, and 80.7 percent, by dollar amount, of total loans within the combined assessment area. Specific to HMDA-reportable loans, the bank originated 87.2 percent, by number, and 83.2 percent, by dollar amount, inside its combined assessment area. The percentage of small business loans made in the combined assessment area also represents a majority at 71.8 percent, by number, and 72.1 percent by dollar volume. Lastly, the percentage of small farm loans made in the assessment areas represents a majority with 70.2 percent, by number, and 69.2 percent by dollar volume. The percentage of HMDA-reportable, small business, and small farm loan originations within the combined assessment area indicates the bank is actively serving the credit needs of the community.

The following table summarizes First Bank of Berne’s lending inside and outside its combined assessment area for HMDA-reportable loans originated from January 1, 2019, to December 31, 2020, and samples of small business and small farm loans originated from November 1, 2020, to October 31, 2021.

| Lending Inside and Outside the Assessment Area |              |             |                |             |            |             |               |             |
|--|--------------|-------------|----------------|-------------|------------|-------------|---------------|-------------|
| Loan Type                                      | Inside       |             |                |             | Outside    |             |               |             |
|  | #            | %           | \$(000s)       | %           | #          | %           | \$(000s)      | %           |
| Home Improvement                               | 24           | 96.0        | 2,036          | 97.4        | 1          | 4.0         | 55            | 2.6         |
| Home Purchase - Conventional                   | 342          | 84.4        | 42,291         | 81.1        | 63         | 15.6        | 9,867         | 18.9        |
| Multi-Family Housing                           | 21           | 84.4        | 5,486          | 82.5        | 4          | 16.0        | 1,161         | 17.5        |
| Refinancing                                    | 462          | 89.0        | 59,663         | 84.4        | 57         | 11.0        | 11,000        | 15.6        |
| <b>Total HMDA related</b>                      | <b>849</b>   | <b>87.2</b> | <b>109,476</b> | <b>83.2</b> | <b>125</b> | <b>12.8</b> | <b>22,083</b> | <b>16.8</b> |
| <b>Small Business related</b>                  | <b>89</b>    | <b>71.8</b> | <b>9,836</b>   | <b>72.1</b> | <b>35</b>  | <b>28.2</b> | <b>3,815</b>  | <b>27.9</b> |
| <b>Small Farm related</b>                      | <b>85</b>    | <b>70.2</b> | <b>12,518</b>  | <b>69.2</b> | <b>36</b>  | <b>29.8</b> | <b>5,561</b>  | <b>30.8</b> |
| <b>TOTAL LOANS</b>                             | <b>1,023</b> | <b>83.9</b> | <b>131,830</b> | <b>80.7</b> | <b>196</b> | <b>16.1</b> | <b>31,460</b> | <b>19.3</b> |

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

### Geographic and Borrower Distribution

First Bank of Berne demonstrated a reasonable geographic distribution of loans given the bank's assessment areas. The bank's distribution of loans to individuals of different income levels (including low- and moderate-income individuals) and businesses and farms of different sizes is reasonable given the demographics of the bank's assessment areas. The specifics of the bank's lending in each assessment area and relevant demographics are discussed in the individual assessment area sections.

### Response to Complaints

The bank or this Reserve Bank has not received any CRA-related complaints since the previous examination.

### COMMUNITY DEVELOPMENT TEST

The bank's performance relative to the community development test is Satisfactory.

### Lending, Investment, and Services Activities

First Bank of Berne demonstrates adequate responsiveness to the community development needs of its assessment areas through community development loans, qualified investments, and community development services.

During the evaluation period, First Bank of Berne originated 10 community development loans in the amount of \$2.6 million within the bank's full review assessment areas. In addition, the bank made two community development loans totaling \$762,000 that benefited the broader statewide and regional areas. All loans were made to organizations that support affordable housing and directly benefits low- and moderate-income individuals. Community development lending decreased by dollar volume since the previous evaluation where the bank made 12 qualified loans



totaling \$8.6 million.

First Bank of Berne made five qualified community development investments since the previous evaluation totaling approximately \$4.0 million. Of those, the bank made one community development investment totaling \$500,000 that benefits the broader state of Indiana. This was an increase over the previous evaluation when the bank made \$3.4 million qualified investments in the assessment area. Qualified investments were primarily for the community development purposes of affordable housing and community service. The bank also made 198 qualified donations to 99 unique organizations totaling \$207,641 in the full review assessment areas. In addition, the bank made 83 qualified donations totaling \$87,622 in the limited review assessment area. Of this, the bank provided contributions to organizations which support affordable housing, small business and economic development, and community services tailored to meet the needs of low- and moderate-income individuals and households in the bank’s assessment area. This is an overall increase from 115 unique organizations donations for \$217,068 at the previous evaluation.

During the evaluation period bank staff provided approximately 3,161 hours of community development services to 25 unique organizations in the full review assessment areas. In addition, one organization accounted for 45 service hours which benefited the broader state of Indiana. Benefitting from these services were organizations that received financial planning expertise and mentoring programs that target low- and moderate-income individuals throughout the bank’s assessment areas. Bank employees served as board members or committee members for a majority of these organizations. Community development services hours increased since the previous evaluation where the bank provided 2,047 hours of community services to 25 unique organizations.

The specifics of the bank’s community development activities are discussed in the individual assessment area sections.

| Community Development Activities<br>January 8, 2019 - January 31, 2022 |           |                  |             |                  |            |                |           |              |
|--|-----------|------------------|-------------|------------------|------------|----------------|-----------|--------------|
| Assessment Area  | Loans     |                  | Investments |                  | Donations  |                | Services  |              |
|  | #         | \$               | #           | \$               | #          | \$             | #         | Hours        |
| <b>Full Review</b>   |           |                  |             |                  |            |                |           |              |
| Eastern Indiana Non MSA  | 8         | 2,159,999        | 0           | 0                | 128        | 148,696        | 61        | 2469         |
| Kokomo Indiana MSA   | 2         | 438,712          | 3           | 3,205,684        | 56         | 54,015         | 4         | 170          |
| Ohio Non MSA   | 0         | 0                | 1           | 340,000          | 14         | 4,930          | 10        | 522          |
| <b>Limited Review</b>  |           |                  |             |                  |            |                |           |              |
| Western Indiana Non-MSA  | 0         | 0                | 0           | 0                | 83         | 87,622         | 0         | 0            |
| <b>Other</b>   |           |                  |             |                  |            |                |           |              |
| Broader Statewide and Regional Area                                    | 2         | 762,000          | 1           | 500,000          | 0          | 0              | 3         | 45           |
| <b>Total Qualified</b>   | <b>12</b> | <b>3,360,710</b> | <b>5</b>    | <b>4,045,684</b> | <b>281</b> | <b>295,263</b> | <b>78</b> | <b>3,206</b> |

## **FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

## STATE OF INDIANA

### **CRA RATING FOR INDIANA: Satisfactory**

**The Lending Test is rated: Satisfactory**

**The Community Development Test is rated: Satisfactory**

The bank's Indiana rating is based on the institution's performance in the Eastern Indiana Non-MSA and Kokomo, Indiana MSA #29020 assessment areas. The geographic distribution of loans reflects reasonable dispersion throughout the assessment area and loan distribution reflects reasonable penetration among individuals of different income levels, including low- and moderate-income, and businesses and farms of different sizes. The bank's community development performance demonstrates adequate responsiveness to the community development needs of its assessment area through community development qualified loans, investments and donations, and services.

### **SCOPE OF EXAMINATION**

The scope of the review for the state of Indiana is consistent with the overall scope presented in the Scope of Examination section of the performance evaluation. A full-scope review was conducted to evaluate the bank's Eastern Indiana Non-MSA and Kokomo, Indiana MSA #29020 assessment areas. Additionally, the evaluation consists of a limited-scope review of the bank's Western Indiana Non-MSA. Overall, the state of Indiana carried more weight during the overall evaluation as a majority of the bank's activities occurred in this portion of the bank's combined assessment area.

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN INDIANA**

The bank operates within three assessment areas covering the northeast portion of the state of Indiana including Eastern Indiana Non-MSA; Western Indiana Non-MSA; and the Kokomo, Indiana MSA #29020. Adams, Jay, and Wells Counties comprise the Eastern Indiana Non-MSA assessment area. The remaining two assessment areas, Kokomo, IN MSA #29020 and Western Indiana Non-MSA consist of Howard and Miami County in their entirety, respectively. The bank's operations center and main office is located in Berne, Indiana in the Eastern Indiana Non-MSA assessment area along with four branches and cash-only ATMs. The remaining two assessment areas each contain one branch and cash-only ATM.

Please refer to the individual assessment area summary for additional details regarding the bank's operations, as well as demographic and economic conditions.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN INDIANA

### LENDING TEST

First Bank of Berne's performance relative to the lending test in Indiana is satisfactory. The geographic distribution of loans reflects a reasonable dispersion throughout the assessment area and loan distribution reflects reasonable penetration among individuals of different income levels, including low- and moderate-income, and businesses and farms of different sizes.

#### **Geographic and Borrower Distribution**

First Bank of Berne's lending activities reflect reasonable distribution throughout the assessment areas within the state of Indiana. The geographic distribution of HMDA-reportable, small business and small farm loans reflect reasonable distribution in the Eastern Indiana Non-MSA and Kokomo Indiana MSA #29020 assessment areas. In addition, the distribution of lending reflects reasonable penetration among individuals of different income levels including low- and moderate-income, and businesses and farms of different sizes. The conclusions were drawn from the bank's lending activities as supported by a review of HMDA-reportable, small businesses, and small farm loans. Please refer to the individual assessment area summary sections for further details.

### COMMUNITY DEVELOPMENT TEST

#### **Lending, Investments, and Services Activities**

First Bank of Berne's community development activities are satisfactory. The bank demonstrates adequate responsiveness to the community development needs of its assessment areas through community development loans, qualified investments, and community development services. The bank's conclusions regarding lending, investment, and service activities within the state of Indiana are based upon the analysis of the Eastern Indiana Non-MSA and Kokomo Indiana MSA #29020 assessment areas. Please refer to the individual assessment area summary for support of the overall rating.

## EASTERN INDIANA NON-MSA– FULL REVIEW

### SCOPE OF EXAMINATION

Full scope examination procedures were used to evaluate the bank’s performance in the Eastern Indiana Non-MSA assessment area. The scope of this section is consistent with the overall scope of the examination described within the institution summary. For further information refer to the “Scope of Examination” section for details.

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN EASTERN INDIANA NON-MSA

The bank’s Eastern Indiana Non-MSA assessment is comprised of 21 census tracts located in Northeast Indiana. The delineation of the assessment area includes Adams, Jay, and Wells Counties, in their entirety. Based on 2020, FFIEC Census data, the census tract composition is comprised of two moderate-income, 17 middle-income, and two upper-income census tracts. No low-income census tracts are located in the assessment area. None of the middle-income census tracts are designated as distressed or underserved. Since the previous examination, the Office of Management and Budget (OMB) moved Wells County out of the Fort Wayne Indiana MSA #23060 to a Non-MSA status. The partial Fort Wayne MSA, consisting of Wells County, had been evaluated as a separate assessment area in the previous evaluation, while Adams and Jay Counties were evaluated as the Eastern Indiana Non-MSA. All three counties now make up the Eastern Indiana Non-MSA assessment area and will be evaluated under the Eastern Indiana Non-MSA.

The bank operates its headquarters and four full-service branches with cash-only ATMs in the assessment area. One branch is located in Berne, while three remaining branches are located in Bluffton, Decatur, and Portland Indiana. All branches and ATMs are located in middle-income census tracts. Since the previous evaluation, the bank closed one full-service branch, one limited-service branch and one cash-only ATM that were also located in middle-income tracts.

In 2020, 165 total HMDA reporters within the assessment area originated or purchased 3,720 HMDA-reportable loans. First Bank of Berne ranked first among HMDA reporting institutions by originating 485 HMDA-reportable loans. By comparison, the second and third ranked financial institutions were First Merchants Bank and Ruoff Mortgage Company, Inc., with 288 and 285 originations and purchase transactions.

According to the June 30, 2021 Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, First Bank of Berne ranked first among 10 FDIC-insured financial institutions operating in the assessment area with 38.5 percent of the deposit market share. Leaders in market share following First Bank of Berne include First Merchants Bank (23.1 percent) and The Farmers & Merchants State Bank (19.3 percent).

| Assessment Area: 2021 Eastern IN Non MSA |                                 |                                    |                          |                  |  |                      |                           |              |
|--|---------------------------------|------------------------------------|--------------------------|------------------|--|----------------------|---------------------------|--------------|
| Income Categories                        | Tract Distribution              |                                    | Families by Tract Income |                  | Families < Poverty Level as % of Families by Tract |                      | Families by Family Income |              |
|  | #                               | %                                  | #                        | %                | #  | %                    | #                         | %            |
| Low-income                               | 0                               | 0.0                                | 0                        | 0.0              | 0  | 0.0                  | 3,631                     | 16.7         |
| Moderate-income                          | 2                               | 9.5                                | 1,581                    | 7.3              | 314  | 19.9                 | 3,685                     | 17.0         |
| Middle-income                            | 17                              | 81.0                               | 17,869                   | 82.3             | 1,782  | 10.0                 | 5,514                     | 25.4         |
| Upper-income                             | 2                               | 9.5                                | 2,257                    | 10.4             | 96   | 4.3                  | 8,877                     | 40.9         |
| Unknown-income                           | 0                               | 0.0                                | 0                        | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| <b>Total Assessment Area</b>             | <b>21</b>                       | <b>100.0</b>                       | <b>21,707</b>            | <b>100.0</b>     | <b>2,192</b>                                       | <b>10.1</b>          | <b>21,707</b>             | <b>100.0</b> |
|  | Housing Units by Tract          | Housing Types by Tract             |                          |                  |  |                      |                           |              |
|  |                                 | Owner-Occupied                     |                          | Rental           |  | Vacant               |                           |              |
|  |                                 | #                                  | %                        | %                | #  | %                    | #                         | %            |
| Low-income                               | 0                               | 0                                  | 0.0                      | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| Moderate-income                          | 2,995                           | 1,596                              | 6.5                      | 53.3             | 905  | 30.2                 | 494                       | 16.5         |
| Middle-income                            | 27,934                          | 20,135                             | 82.5                     | 72.1             | 5,536  | 19.8                 | 2,263                     | 8.1          |
| Upper-income                             | 3,036                           | 2,683                              | 11.0                     | 88.4             | 276  | 9.1                  | 77                        | 2.5          |
| Unknown-income                           | 0                               | 0                                  | 0.0                      | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| <b>Total Assessment Area</b>             | <b>33,965</b>                   | <b>24,414</b>                      | <b>100.0</b>             | <b>71.9</b>      | <b>6,717</b>                                       | <b>19.8</b>          | <b>2,834</b>              | <b>8.3</b>   |
|  | Total Businesses by Tract       | Businesses by Tract & Revenue Size |                          |                  |  |                      |                           |              |
|  |                                 | Less Than or = \$1 Million         |                          | Over \$1 Million |  | Revenue Not Reported |                           |              |
|  |                                 | #                                  | %                        | #                | %  | #                    | %                         |              |
| Low-income                               | 0                               | 0                                  | 0.0                      | 0                | 0.0  | 0                    | 0.0                       |              |
| Moderate-income                          | 247                             | 8.0                                | 217                      | 7.8              | 22   | 9.3                  | 8                         | 15.4         |
| Middle-income                            | 2,533                           | 82.4                               | 2,307                    | 82.8             | 189  | 80.1                 | 37                        | 71.2         |
| Upper-income                             | 294                             | 9.6                                | 262                      | 9.4              | 25   | 10.6                 | 7                         | 13.5         |
| Unknown-income                           | 0                               | 0.0                                | 0                        | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| <b>Total Assessment Area</b>             | <b>3,074</b>                    | <b>100.0</b>                       | <b>2,786</b>             | <b>100.0</b>     | <b>236</b>   | <b>100.0</b>         | <b>52</b>                 | <b>100.0</b> |
|  | Percentage of Total Businesses: |                                    |                          | 90.6             |  | 7.7                  |                           | 1.7          |
|  | Total Farms by Tract            | Farms by Tract & Revenue Size      |                          |                  |  |                      |                           |              |
|  |                                 | Less Than or = \$1 Million         |                          | Over \$1 Million |  | Revenue Not Reported |                           |              |
|  |                                 | #                                  | %                        | #                | %  | #                    | %                         |              |
| Low-income                               | 0                               | 0                                  | 0.0                      | 0                | 0.0  | 0                    | 0.0                       |              |
| Moderate-income                          | 1                               | 0.2                                | 1                        | 0.2              | 0  | 0.0                  | 0                         | 0.0          |
| Middle-income                            | 420                             | 87.0                               | 415                      | 87.2             | 4  | 66.7                 | 1                         | 100.0        |
| Upper-income                             | 62                              | 12.8                               | 60                       | 12.6             | 2  | 33.3                 | 0                         | 0.0          |
| Unknown-income                           | 0                               | 0.0                                | 0                        | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| <b>Total Assessment Area</b>             | <b>483</b>                      | <b>100.0</b>                       | <b>476</b>               | <b>100.0</b>     | <b>6</b>   | <b>100.0</b>         | <b>1</b>                  | <b>100.0</b> |
|  | Percentage of Total Farms:      |                                    |                          | 98.6             |  | 1.2                  |                           | 0.2          |

2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS

Note: Percentages may not add to 100.0 percent due to rounding

## Population Change

The following table presents the population trends for the assessment area, Non-MSA Indiana, and the state of Indiana from 2010 to 2015. According to the 2015 U.S Census Bureau American Community Survey (ACS) population demographics, the population within the assessment area is 83,693, representing a minimal increase of 0.5 percent since 2010. Overall, the population in all geographies remained relatively consistent with 2010 figures. According to a community representative, overall population has remained stable due to the existence of local job opportunities.

| Population Change  |                 |                      |                       |
|--|-----------------|----------------------|-----------------------|
| Area   | 2010 Population | 2011-2015 Population | Percentage Change (%) |
| Assessment Area  | 83,276          | 83,693               | 0.5%                  |
| Adams County   | 34,387          | 34,642               | 0.7%                  |
| Jay County   | 21,253          | 21,255               | 0.0%                  |
| Wells County   | 27,636          | 27,796               | 0.6%                  |
| Non MSA Indiana  | 1,481,934       | 1,475,951            | -0.4%                 |
| State of Indiana   | 6,483,802       | 6,568,645            | 1.3%                  |
| <i>Source: 2010 – U.S. Census Bureau: Decennial Census<br/>2011-2015 – U.S. Census Bureau: American Community Survey</i> |                 |                      |                       |

## Income Characteristics

According to 2015 U.S. Census Bureau ACS data, the assessment area is comprised of 21,707 families, of which 16.7 percent are designated as low-income, 17.0 percent are moderate income, 25.4 percent are middle-income, and 40.9 percent are upper income. Approximately 10.1 percent of families residing within the assessment area live below the poverty line.

The following table presents the Median Family Income (MFI) for the counties comprising the assessment area, non-MSA Indiana, and the state of Indiana. According to 2011-2015 U.S Census Bureau ACS data, median family income in the assessment area experienced a slight increase of 1.2 percent from 2010, which is above the state of Indiana and the Non-Indiana MSA which experienced a decrease of 4.8 and 2.5 percent respectively. Of the counties comprising the assessment area, Adams and Wells Counties experienced growth in MFIs from 2010 at 2.3 percent and 2.5 percent, respectively; while Jay County experienced slight decrease of 2.4 percent during the same period. Of those counties, Wells County maintained the highest MFI figure at \$63,470. A community representative confirmed that the MFI in the surrounding areas has remained unchanged and attributed the stagnant MFI to the reduction of higher paying career opportunities in neighboring communities.

| Median Family Income Change  |                           |                           |                    |
|--|---------------------------|---------------------------|--------------------|
| Area   | 2010 Median Family Income | 2015 Median Family Income | Percent Change (%) |
| Assessment Area  | \$57,316                  | \$57,980                  | 1.2%               |
| Adams County   | \$57,830                  | \$59,178                  | 2.3%               |
| Jay County   | \$52,189                  | \$50,957                  | -2.4%              |
| Wells County   | \$61,945                  | \$63,470                  | 2.5%               |
| Non-MSA Indiana  | \$57,143                  | \$55,715                  | -2.5%              |
| State of Indiana   | \$64,187                  | \$61,119                  | -4.8%              |
| <i>Source: 2006-2010 – U.S. Census Bureau: American Community Survey<br/>2011-2015 – U.S. Census Bureau: American Community Survey<br/>Median Family Incomes have been inflation-adjusted and are expressed in 2015 dollars.</i> |                           |                           |                    |

### Housing Characteristics

According to 2015 US Census Bureau ACS data, there are a total of 33,965 housing units in the assessment area. The majority of housing units are owner-occupied at 71.9 percent, while 19.8 percent are rental units and 8.3 percent of housing units are vacant.

Renters and homeowners are considered overburdened when housing cost equal 30.0 percent or more of household income. The following table shows the percentage of renters and owners spending more than 30.0 percent of household income on housing costs. The assessment area rental market is slightly below the state of Indiana, with 66.9 percent of low-income, 23.3 percent of moderate-income, and 37.9 percent of all renters facing a housing cost burden. For homeowners, the assessment area is more affordable and aligned with the state of Indiana with the exception of low-income owners which represents 58.0 percent, 17.0 percent for moderate-income, and 15.6 percent of all owners facing a cost burden. A community representative noted that residents experienced challenges when selling their homes, which ultimately cause housing prices to decline. The representative further noted that there is a need for more affordable housing options.

| 2011-2015 Housing Cost Burden   |                           |                 |             |                          |                 |            |
|---|---------------------------|-----------------|-------------|--------------------------|-----------------|------------|
| Area  | Cost Burden (%) - Renters |                 |             | Cost Burden (%) - Owners |                 |            |
|   | Low Income                | Moderate Income | All Renters | Low Income               | Moderate Income | All Owners |
| Assessment Area   | 66.9                      | 23.3            | 37.9        | 58.0                     | 17.0            | 15.6       |
| Adams County  | 64.4                      | 23.1            | 39.3        | 55.9                     | 15.4            | 16.0       |
| Jay County  | 66.0                      | 9.4             | 34.4        | 60.0                     | 16.3            | 17.2       |
| Wells County  | 72.1                      | 31.9            | 39.5        | 58.9                     | 19.1            | 14.1       |
| Non MSA Indiana   | 67.2                      | 25.6            | 35.5        | 55.1                     | 23.7            | 15.2       |
| State of Indiana  | 74.3                      | 33.4            | 41.9        | 59.5                     | 28.0            | 16.1       |
| <i>Cost Burden is housing cost that equals 30 percent or more of household income.<br/>Source: U.S. Department of Housing and Urban Development (HUD), 2011-2015 Comprehensive Housing Affordability Strategy</i> |                           |                 |             |                          |                 |            |



## Employment Characteristics

The following table presents the unemployment trends for the counties in the assessment area and the state of Indiana from 2016 to 2020. Unemployment rates experienced declines from 2016 to 2019, but experienced significant increases in unemployment in 2020. Of the counties comprising the assessment area, Jay County maintained the highest unemployment rate at 6.6 percent in 2020. According to a community representative, the unemployment rate in the assessment area was impacted in 2020 due to the COVID-19 pandemic which placed a strain on manufacturing companies in the region. However, the representative noted the counties that make up the assessment area were not impacted as severely as other counties in the state of Indiana.

| Recent Unemployment Rates (%) |      |      |      |      |      |
|-------------------------------|------|------|------|------|------|
| Area                          | 2016 | 2017 | 2018 | 2019 | 2020 |
| Assessment Area               | 3.8  | 2.9  | 2.8  | 2.7  | 5.8  |
| Adams County                  | 3.5  | 2.6  | 2.6  | 2.6  | 5.6  |
| Jay County                    | 4.5  | 3.5  | 3.2  | 2.9  | 6.6  |
| Wells County                  | 3.5  | 2.9  | 2.8  | 2.7  | 5.7  |
| State of Indiana              | 4.4  | 3.5  | 3.4  | 3.2  | 7.1  |

*Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics*

## Industry Characteristics

The primary industries within the assessment area include manufacturing, health care, and retail. Employment within the transportation and warehousing industry experienced significant growth within the previous few years, increasing 45.0 percent from first quarter January 2018 through fourth quarter 2020. A community representative confirmed that manufacturing provides the main source of employment for the area. Tyson and General Motors were identified as the major employers. However, the representative noted that the manufacturing industry is shrinking, and jobs are moving towards the service industry, adversely affecting the low-income residents.

## Community Representative

One community representative was contacted to provide relevant economic, demographic, and community credit need information within the assessment area. Overall, the representative indicated that the COVID-19 pandemic impacted the unemployment rate within the assessment area, adversely affecting the manufacturing sector. They also noted the need for affordable housing, which will continue to be the focus for upcoming years. The representative indicated financial institutions within the assessment area are very involved but could further support the community by increasing small business development.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NON-METROPOLITAN EASTERN INDIANA

### LENDING TEST

#### Geographic Distribution of Loans

Overall, First Bank of Berne's geographic distribution of loans reflects reasonable dispersion throughout the assessment area. The analysis includes HMDA-reportable, small business, and small farm loans; takes into consideration the size and complexity of the bank; and focuses on loan penetration in moderate-income census tracts since there are no low-income census tracts in the bank's assessment area.

A gap analysis was completed as part of the evaluation. The analysis is based on the bank's record of lending to two-moderate-, 17 middle-, and two upper-income census tracts. In 2020, First Bank of Berne originated HMDA-loans in all census tracts comprising the assessment area. In 2021, small business and small farm loans were originated in 90.5 percent of census tracts, which included all moderate-income census tracts. Based upon this analysis, it appears there are no conspicuous geographic lending gaps.

As previously noted, the lending analysis was driven by the bank's 2020 Home Mortgage Disclosure Act (HMDA) and a sample of the bank's 2021 small business and small farm loans. Please refer to Appendix B for the 2019 HMDA-reportable loan tables and Appendix C for the 2020 small business and small farm loans loan tables. Lastly, all loans received equal weight in the evaluation.

#### HMDA – Reportable Loans

First Bank of Berne's geographic distribution of 2020 HMDA-reportable loans reflects reasonable dispersion throughout the assessment area. The bank's primary HMDA-reportable loan products originated in this assessment area during the review period were home purchase and refinance loans, which are discussed below. The remaining HMDA-reportable loan products will not be evaluated due to low volume of originations.

##### *Home Purchase Loans*

In 2020, home purchase loans represented 30.5 percent of the bank's total HMDA-reportable loans originated. First Bank of Berne originated 4.8 percent of its home purchase loans to moderate-income borrowers. The bank's performance was below the aggregate of lenders at 8.5 percent, but comparable with 6.5 percent of owner-occupied units. The bank originated a majority of its home purchase loans (91.2 percent) in middle-income census tracts, with its performance being above the aggregate of lenders at 81.3 percent and the percent of owner-occupied units at 82.5 percent.

### *Refinance*

In 2020, refinance loans represented 65.6 percent of the bank's total HMDA-reportable loans originated. The bank originated 1.9 percent of its refinance loans in the moderate-income census tracts. The bank's performance was comparable to the aggregate of lenders at 4.0 percent, but below the percentage of owner-occupied units at 6.5 percent. Similar to home purchase loans, the bank originated a majority (89.9 percent) in middle-income census tracts, with its performance being above the aggregate of lenders at 80.3 percent and the percent of owner-occupied units at 82.5 percent.

Overall, the geographic distribution of HMDA-reportable lending in 2019 was consistent with the bank's performance in 2020. The 2019 distribution table of HMDA-reportable loans can be found in Appendix B. The following table presents the 2020 geographic distribution of HMDA-reportable loans originated in the assessment area.

| Geographic Distribution of HMDA Reportable Loans |                     |                                     |            |              |              |               |                           |
|--|---------------------|-------------------------------------|------------|--------------|--------------|---------------|---------------------------|
| Assessment Area: 2020 Eastern IN Non MSA         |                     |                                     |            |              |              |               |                           |
| Product Type                                     | Tract Income Levels | Bank & Aggregate Lending Comparison |            |              |              |               | Owner Occupied % of Units |
|  |                     | 2020                                |            | 2020         |              |               |                           |
|  |                     | Count Bank                          | Agg        | Dollar Bank  | Agg          |               |                           |
|  |                     | #                                   | %          | \$ (000s)    | \$ %         | \$ %          |                           |
| Home Purchase                                    | Low                 | 0                                   | 0.0        | 0.0          | 0            | 0.0           | 0.0                       |
|  | Moderate            | 7                                   | 4.8        | 8.5          | 762          | 3.8           | 6.5                       |
|  | Middle              | 134                                 | 91.2       | 81.3         | 17,929       | 89.7          | 82.5                      |
|  | Upper               | 6                                   | 4.1        | 10.2         | 1,306        | 6.5           | 11.0                      |
|  | Unknown             | 0                                   | 0.0        | 0.0          | 0            | 0.0           | 0.0                       |
|  | <b>Total</b>        |                                     | <b>147</b> | <b>100.0</b> | <b>100.0</b> | <b>19,997</b> | <b>100.0</b>              |
| Refinance  | Low                 | 0                                   | 0.0        | 0.0          | 0            | 0.0           | 0.0                       |
|  | Moderate            | 6                                   | 1.9        | 4.0          | 456          | 1.1           | 6.5                       |
|  | Middle              | 284                                 | 89.9       | 80.3         | 37,945       | 88.5          | 82.5                      |
|  | Upper               | 26                                  | 8.2        | 15.7         | 4,471        | 10.4          | 11.0                      |
|  | Unknown             | 0                                   | 0.0        | 0.0          | 0            | 0.0           | 0.0                       |
|  | <b>Total</b>        |                                     | <b>316</b> | <b>100.0</b> | <b>100.0</b> | <b>42,872</b> | <b>100.0</b>              |
| Home Improvement                                 | Low                 | 0                                   | 0.0        | 0.0          | 0            | 0.0           | 0.0                       |
|  | Moderate            | 1                                   | 12.5       | 4.4          | 21           | 4.3           | 6.5                       |
|  | Middle              | 6                                   | 75.0       | 80.3         | 450          | 91.6          | 82.5                      |
|  | Upper               | 1                                   | 12.5       | 15.3         | 20           | 4.1           | 11.0                      |
|  | Unknown             | 0                                   | 0.0        | 0.0          | 0            | 0.0           | 0.0                       |
|  | <b>Total</b>        |                                     | <b>8</b>   | <b>100.0</b> | <b>100.0</b> | <b>491</b>    | <b>100.0</b>              |
| Multi-Family                                     | Low                 | 0                                   | 0.0        | 0.0          | 0            | 0.0           | 0.0                       |
|  | Moderate            | 3                                   | 27.3       | 21.4         | 788          | 22.2          | 6.2                       |
|  | Middle              | 8                                   | 72.7       | 71.4         | 2,761        | 77.8          | 92.3                      |
|  | Upper               | 0                                   | 0.0        | 7.1          | 0            | 0.0           | 1.4                       |
|  | Unknown             | 0                                   | 0.0        | 0.0          | 0            | 0.0           | 0.0                       |
|  | <b>Total</b>        |                                     | <b>11</b>  | <b>100.0</b> | <b>100.0</b> | <b>3,549</b>  | <b>100.0</b>              |
| Other Purpose LOC                                | Low                 | 0                                   | 0.0        | 0.0          | 0            | 0.0           | 0.0                       |
|  | Moderate            | 0                                   | 0.0        | 3.6          | 0            | 0.0           | 6.5                       |
|  | Middle              | 0                                   | 0.0        | 79.8         | 0            | 0.0           | 82.5                      |
|  | Upper               | 0                                   | 0.0        | 16.7         | 0            | 0.0           | 11.0                      |
|  | Unknown             | 0                                   | 0.0        | 0.0          | 0            | 0.0           | 0.0                       |
|  | <b>Total</b>        |                                     | <b>0</b>   | <b>0.0</b>   | <b>100.0</b> | <b>0</b>      | <b>0.0</b>                |
| Other Purpose Closed/Exempt                      | Low                 | 0                                   | 0.0        | 0.0          | 0            | 0.0           | 0.0                       |
|  | Moderate            | 0                                   | 0.0        | 4.7          | 0            | 0.0           | 6.5                       |
|  | Middle              | 0                                   | 0.0        | 81.4         | 0            | 0.0           | 82.5                      |
|  | Upper               | 0                                   | 0.0        | 14.0         | 0            | 0.0           | 11.0                      |
|  | Unknown             | 0                                   | 0.0        | 0.0          | 0            | 0.0           | 0.0                       |
|  | <b>Total</b>        |                                     | <b>0</b>   | <b>0.0</b>   | <b>100.0</b> | <b>0</b>      | <b>0.0</b>                |
| Loan Purpose Not Applicable                      | Low                 | 0                                   | 0.0        | 0.0          | 0            | 0.0           | 0.0                       |
|  | Moderate            | 0                                   | 0.0        | 13.0         | 0            | 0.0           | 6.5                       |
|  | Middle              | 0                                   | 0.0        | 76.1         | 0            | 0.0           | 82.5                      |
|  | Upper               | 0                                   | 0.0        | 10.9         | 0            | 0.0           | 11.0                      |
|  | Unknown             | 0                                   | 0.0        | 0.0          | 0            | 0.0           | 0.0                       |
|  | <b>Total</b>        |                                     | <b>0</b>   | <b>0.0</b>   | <b>100.0</b> | <b>0</b>      | <b>0.0</b>                |
| HMDA Totals                                      | Low                 | 0                                   | 0.0        | 0.0          | 0            | 0.0           | 0.0                       |
|  | Moderate            | 17                                  | 3.5        | 5.8          | 2,027        | 3.0           | 6.5                       |
|  | Middle              | 432                                 | 89.6       | 80.6         | 59,085       | 88.3          | 82.5                      |
|  | Upper               | 33                                  | 6.8        | 13.6         | 5,797        | 8.7           | 11.0                      |
|  | Unknown             | 0                                   | 0.0        | 0.0          | 0            | 0.0           | 0.0                       |
|  | <b>Total</b>        |                                     | <b>482</b> | <b>100.0</b> | <b>100.0</b> | <b>66,909</b> | <b>100.0</b>              |

Originations & Purchases  
2016 FFIEC Census Data

Note: Percentages may not add to 100.0 percent due to rounding

### Small Business Loans

The geographic distribution of small business loans reflects a reasonable dispersion throughout the assessment area. The 2021 sample includes 69 small business loans originated within the assessment area. Of these, the bank originated 17.4 percent within the moderate-income census tract, which is above the total businesses located in the moderate-income census tract at 8.0 percent. A majority (58.0 percent) of the bank’s small business loans were originated in middle-income census tracts which is significantly below the percentage of total businesses located in those geographies at 82.4 percent. The following table presents the 2021 geographic distribution of small business loans originated in the assessment area.

| <b>Geographic Distribution of Small Business Loans</b> |                            |  |              |                         |              |                         |
|--|----------------------------|--|--------------|-------------------------|--------------|-------------------------|
| <b>Assessment Area: 2021 Eastern IN Non MSA</b>        |                            |  |              |                         |              |                         |
|  | <b>Tract Income Levels</b> | <b>Bank &amp; Demographic Comparison</b> |              |                         |              |                         |
|  |                            | <b>Count Bank</b>                        |              | <b>2021 Dollar Bank</b> |              | <b>Total Businesses</b> |
|  |                            | <b>#</b>                                 | <b>%</b>     | <b>\$ 000s</b>          | <b>\$ %</b>  |                         |
| <b>Small Business</b>                                  | Low                        | 0  | 0.0          | 0                       | 0.0          | 0.0                     |
|  | Moderate                   | 12                                       | 17.4         | 1,284                   | 20.3         | 8.0                     |
|  | Middle                     | 40                                       | 58.0         | 3,903                   | 61.8         | 82.4                    |
|  | Upper                      | 17                                       | 24.6         | 1,131                   | 17.9         | 9.6                     |
|  | Unknown                    | 0  | 0.0          | 0                       | 0.0          | 0.0                     |
|  | <b>Total</b>               | <b>69</b>                                | <b>100.0</b> | <b>6,319</b>            | <b>100.0</b> | <b>100.0</b>            |

2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

### Small Farm Loans

The geographic distribution of small farm loans reflects a reasonable dispersion throughout the assessment area. The 2021 sample includes 63 small farm loans originated within the assessment area. Of these loans, the bank originated 1.6 percent within the moderate-income census tract, which is comparable to the percentage of total farms located in the moderate-income census tract at 0.2 percent. A substantial majority (95.2 percent) of the bank’s small farm loans were originated in middle-income census tracts, which is above the percentage of total farms located in those geographies at 87.0 percent. The following table presents the bank’s geographic distribution of small farm loans in 2021.

| <b>Geographic Distribution of Small Farm Loans</b> |                            |  |              |                    |              |                    |
|--|----------------------------|--|--------------|--------------------|--------------|--------------------|
| <b>Assessment Area: 2021 Eastern IN Non MSA</b>    |                            |  |              |                    |              |                    |
|  | <b>Tract Income Levels</b> | <b>Bank &amp; Demographic Comparison</b> |              |                    |              |                    |
|  |                            | <b>Count Bank</b>                        |              | <b>Dollar Bank</b> |              | <b>Total Farms</b> |
|  |                            | <b>#</b>                                 | <b>%</b>     | <b>\$ 000s</b>     | <b>\$ %</b>  |                    |
| <b>Small Farm</b>                                  | Low                        | 0  | 0.0          | 0                  | 0.0          | 0.0                |
|  | Moderate                   | 1  | 1.6          | 150                | 1.7          | 0.2                |
|  | Middle                     | 60                                       | 95.2         | 8,430              | 96.4         | 87.0               |
|  | Upper                      | 2  | 3.2          | 161                | 1.8          | 12.8               |
|  | Unknown                    | 0  | 0.0          | 0                  | 0.0          | 0.0                |
|  | <b>Total</b>               | <b>63</b>                                | <b>100.0</b> | <b>8,741</b>       | <b>100.0</b> | <b>100.0</b>       |

2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

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

The bank demonstrates a distribution of loans to individuals of different income levels (including low- and moderate-income individuals) and businesses and farms of different sizes that is reasonable given the demographics of the bank's assessment area.

**HMDA-Reportable Loans**

The borrower distribution of HMDA-reportable loans reflects reasonable penetration among individuals of different income levels. The bank's primary HMDA-reportable loan products originated during the review period in this assessment area were home purchase and refinance loans, which are discussed below. The remaining HMDA-reportable loan products will not be evaluated due to low volumes of originations.

*Home Purchase*

In 2020, home loan purchases represented 30.5 percent of the bank's total HMDA-reportable loans originated, with a total of 147 loans. First Bank of Berne originated 10.9 percent of its home purchase loans to low-income borrowers which was comparable to the percentage made by aggregate lenders at 10.8 percent and below the percentage of low-income families in the assessment area at 16.7 percent. The bank made 27.2 percent of its home purchase loans to moderate-income borrowers in 2020. The bank's lending in moderate-income census tracts was below the percentage made by aggregate lenders at 31.5 percent and above moderate-income families in the assessment at 17.0 percent.

*Refinance*

In 2020, refinance loans represented 65.6 percent of the bank's total HMDA-reportable loans originated, with a total of 316 loans. First Bank of Berne originated 5.1 percent of its refinance loans to low-income borrowers. This was comparable to the aggregate of lenders of 6.6 percent and below the percentage of low-income families at 16.7 percent. The bank made 28.2 percent of its refinance loans to moderate-income borrowers. This is above the aggregate of lenders at 21.7 percent and above the percentage of moderate-income families in the assessment area at 17.0 percent.

The following table presents the borrower distribution of HMDA-reportable loans in the assessment area in 2020. The table for borrower distribution of HMDA-reportable loans in 2019 can be found in Appendix B. Overall, the borrower distribution of HMDA-reportable lending in 2019 was consistent with the bank's performance in 2020.

| <b>Borrower Distribution of HMDA Reportable Loans</b>                 |                        |                                     |            |              |              |               |              |                             |
|---|------------------------|-------------------------------------|------------|--------------|--------------|---------------|--------------|-----------------------------|
| <b>Assessment Area: 2020 Eastern IN Non MSA</b>                       |                        |                                     |            |              |              |               |              |                             |
| Product Type  | Borrower Income Levels | Bank & Aggregate Lending Comparison |            |              |              |               |              | Families by Family Income % |
|   |                        | 2020                                |            |              |              |               |              |                             |
|   |                        | Count Bank                          |            | Agg          | Dollar Bank  |               | Agg          |                             |
|   |                        | #                                   | %          | %            | \$(000s)     | \$ %          | \$ %         |                             |
| Home Purchase   | Low                    | 16                                  | 10.9       | 10.8         | 1,635        | 8.2           | 5.6          | 16.7                        |
|   | Moderate               | 40                                  | 27.2       | 31.5         | 4,279        | 21.4          | 21.4         | 17.0                        |
|   | Middle                 | 37                                  | 25.2       | 22.8         | 5,587        | 27.9          | 21.1         | 25.4                        |
|   | Upper                  | 40                                  | 27.2       | 23.2         | 7,086        | 35.4          | 29.2         | 40.9                        |
|   | Unknown                | 14                                  | 9.5        | 11.7         | 1,410        | 7.1           | 22.8         | 0.0                         |
|   | <b>Total</b>           |                                     | <b>147</b> | <b>100.0</b> | <b>100.0</b> | <b>19,997</b> | <b>100.0</b> | <b>100.0</b>                |
| Refinance   | Low                    | 16                                  | 5.1        | 6.6          | 1,424        | 3.3           | 4.4          | 16.7                        |
|   | Moderate               | 89                                  | 28.2       | 21.7         | 10,003       | 23.3          | 16.9         | 17.0                        |
|   | Middle                 | 84                                  | 26.6       | 24.6         | 10,532       | 24.6          | 22.3         | 25.4                        |
|   | Upper                  | 110                                 | 34.8       | 35.5         | 18,758       | 43.8          | 42.4         | 40.9                        |
|   | Unknown                | 17                                  | 5.4        | 11.6         | 2,155        | 5.0           | 14.1         | 0.0                         |
|   | <b>Total</b>           |                                     | <b>316</b> | <b>100.0</b> | <b>100.0</b> | <b>42,872</b> | <b>100.0</b> | <b>100.0</b>                |
| Home Improvement  | Low                    | 1                                   | 12.5       | 8.0          | 37           | 7.5           | 6.0          | 16.7                        |
|   | Moderate               | 1                                   | 12.5       | 24.1         | 104          | 21.2          | 14.4         | 17.0                        |
|   | Middle                 | 5                                   | 62.5       | 31.4         | 220          | 44.8          | 32.4         | 25.4                        |
|   | Upper                  | 1                                   | 12.5       | 35.8         | 130          | 26.5          | 46.7         | 40.9                        |
|   | Unknown                | 0                                   | 0.0        | 0.7          | 0            | 0.0           | 0.5          | 0.0                         |
|   | <b>Total</b>           |                                     | <b>8</b>   | <b>100.0</b> | <b>100.0</b> | <b>491</b>    | <b>100.0</b> | <b>100.0</b>                |
| Multi-Family  | Low                    | 0                                   | 0.0        | 0.0          | 0            | 0.0           | 0.0          | 16.7                        |
|   | Moderate               | 0                                   | 0.0        | 0.0          | 0            | 0.0           | 0.0          | 17.0                        |
|   | Middle                 | 0                                   | 0.0        | 0.0          | 0            | 0.0           | 0.0          | 25.4                        |
|   | Upper                  | 1                                   | 9.1        | 7.1          | 130          | 3.7           | 0.4          | 40.9                        |
|   | Unknown                | 10                                  | 90.9       | 92.9         | 3,419        | 96.3          | 99.6         | 0.0                         |
|   | <b>Total</b>           |                                     | <b>11</b>  | <b>100.0</b> | <b>100.0</b> | <b>3,549</b>  | <b>100.0</b> | <b>100.0</b>                |
| Other Purpose LOC   | Low                    | 0                                   | 0.0        | 7.1          | 0            | 0.0           | 6.3          | 16.7                        |
|   | Moderate               | 0                                   | 0.0        | 21.4         | 0            | 0.0           | 16.2         | 17.0                        |
|   | Middle                 | 0                                   | 0.0        | 26.2         | 0            | 0.0           | 22.0         | 25.4                        |
|   | Upper                  | 0                                   | 0.0        | 44.0         | 0            | 0.0           | 54.3         | 40.9                        |
|   | Unknown                | 0                                   | 0.0        | 1.2          | 0            | 0.0           | 1.1          | 0.0                         |
|   | <b>Total</b>           |                                     | <b>0</b>   | <b>0.0</b>   | <b>100.0</b> | <b>0</b>      | <b>0.0</b>   | <b>100.0</b>                |
| Other Purpose Closed/Exempt   | Low                    | 0                                   | 0.0        | 11.6         | 0            | 0.0           | 8.7          | 16.7                        |
|   | Moderate               | 0                                   | 0.0        | 30.2         | 0            | 0.0           | 38.9         | 17.0                        |
|   | Middle                 | 0                                   | 0.0        | 25.6         | 0            | 0.0           | 18.1         | 25.4                        |
|   | Upper                  | 0                                   | 0.0        | 32.6         | 0            | 0.0           | 34.4         | 40.9                        |
|   | Unknown                | 0                                   | 0.0        | 0.0          | 0            | 0.0           | 0.0          | 0.0                         |
|   | <b>Total</b>           |                                     | <b>0</b>   | <b>0.0</b>   | <b>100.0</b> | <b>0</b>      | <b>0.0</b>   | <b>100.0</b>                |
| Loan Purpose Not Applicable   | Low                    | 0                                   | 0.0        | 0.0          | 0            | 0.0           | 0.0          | 16.7                        |
|   | Moderate               | 0                                   | 0.0        | 0.0          | 0            | 0.0           | 0.0          | 17.0                        |
|   | Middle                 | 0                                   | 0.0        | 0.0          | 0            | 0.0           | 0.0          | 25.4                        |
|   | Upper                  | 0                                   | 0.0        | 0.0          | 0            | 0.0           | 0.0          | 40.9                        |
|   | Unknown                | 0                                   | 0.0        | 100.0        | 0            | 0.0           | 100.0        | 0.0                         |
|   | <b>Total</b>           |                                     | <b>0</b>   | <b>0.0</b>   | <b>100.0</b> | <b>0</b>      | <b>0.0</b>   | <b>100.0</b>                |
| HMDA Totals   | Low                    | 33                                  | 6.8        | 8.1          | 3,096        | 4.6           | 4.6          | 16.7                        |
|   | Moderate               | 130                                 | 27.0       | 25.1         | 14,386       | 21.5          | 17.6         | 17.0                        |
|   | Middle                 | 126                                 | 26.1       | 23.8         | 16,339       | 24.4          | 20.4         | 25.4                        |
|   | Upper                  | 152                                 | 31.5       | 30.6         | 26,104       | 39.0          | 34.6         | 40.9                        |
|   | Unknown                | 41                                  | 8.5        | 12.3         | 6,984        | 10.4          | 22.8         | 0.0                         |
|   | <b>Total</b>           |                                     | <b>482</b> | <b>100.0</b> | <b>100.0</b> | <b>66,909</b> | <b>100.0</b> | <b>100.0</b>                |
| Originations & Purchases  |                        |                                     |            |              |              |               |              |                             |
| 2016 FFIEC Census Data  |                        |                                     |            |              |              |               |              |                             |
| <i>Note: Percentages may not add to 100.0 percent due to rounding</i> |                        |                                     |            |              |              |               |              |                             |



### Small Business Loans

The distribution of small business loans reflects reasonable penetration among businesses of different revenue sizes. The 2021 sample includes 69 small business loans originated within the assessment area, of which 49.3 percent by number were to business with annual revenues of \$1 million or less. This is significantly below the gross revenue composition of small businesses in the assessment area, at 90.6 percent. However, 64.7 percent of those were made to farms with revenues of \$1million or less and in amounts of \$100,000 or less, which are considered the most beneficial to small farms, indicating the bank’s willingness to meet the credit needs of small farms. The following table presents the borrower distribution of small business loans in the assessment area in 2021.

| Small Business Lending By Revenue & Loan Size                                    |                                  |                               |           |                  |              |                  |              |
|--|----------------------------------|-------------------------------|-----------|------------------|--------------|------------------|--------------|
| Assessment Area: 2021 Eastern IN Non MSA   |                                  |                               |           |                  |              |                  |              |
| Product Type   |                                  | Bank & Demographic Comparison |           |                  |              |                  |              |
|  |                                  | Count Bank                    |           | 2021 Dollar Bank |              | Total Businesses |              |
|  |                                  | #                             | %         | \$ 000s          | \$ %         | %                |              |
| Small Business   | Revenue                          | \$1 Million or Less           | 34        | 49.3             | 3,545        | 56.1             | 90.6         |
|  |                                  | Over \$1 Million              | 35        | 50.7             | 2,774        | 43.9             | 7.7          |
|  |                                  | Unknown                       | 0         | 0.0              | 0            | 0.0              | 1.7          |
|  |                                  | Total                         | <b>69</b> | <b>100.0</b>     | <b>6,319</b> | <b>100.0</b>     | <b>100.0</b> |
|  | Loan Size                        | \$100,000 or Less             | 54        | 78.3             | 2,101        | 33.2             |              |
|  |                                  | \$100,001 - \$250,000         | 8         | 11.6             | 1,440        | 22.8             |              |
|  |                                  | \$250,001 - \$1 Million       | 7         | 10.1             | 2,778        | 44.0             |              |
|  |                                  | Total                         | <b>69</b> | <b>100.0</b>     | <b>6,319</b> | <b>100.0</b>     |              |
|  | Loan Size & Rev \$1 Mill or Less | \$100,000 or Less             | 22        | 64.7             | 669          | 18.9             |              |
|  |                                  | \$100,001 - \$250,000         | 8         | 23.5             | 1,440        | 40.6             |              |
|  |                                  | \$250,001 - \$1 Million       | 4         | 11.8             | 1,436        | 40.5             |              |
|  |                                  | Total                         | <b>34</b> | <b>100.0</b>     | <b>3,545</b> | <b>100.0</b>     |              |
| Originations & Purchases   |                                  |                               |           |                  |              |                  |              |
| 2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS |                                  |                               |           |                  |              |                  |              |
| <i>Note: Percentages may not add to 100.0 percent due to rounding</i>            |                                  |                               |           |                  |              |                  |              |

### Small Farm Loans

The distribution of small farm loans reflects excellent penetration among farms of different revenue sizes. The 2021 sample included 63 small farm loans, of which 95.2 percent by number were to farms with gross revenues equal to or less than \$1 million. This is comparable to the gross revenue composition of small farms in the assessment area, at 98.6 percent. Further, 46.7 percent of those were in amounts of \$100,000 or less, which are considered the most beneficial to small farms, indicating the bank’s willingness to meet the credit needs of small farms. The following table presents the bank’s borrower distribution of small farm loans in 2021.

| Small Farm Lending By Revenue & Loan Size |                                  |                               |           |              |              |              |              |
|---|----------------------------------|-------------------------------|-----------|--------------|--------------|--------------|--------------|
| Assessment Area: 2021 Eastern IN Non MSA  |                                  |                               |           |              |              |              |              |
| Product Type                              |                                  | Bank & Demographic Comparison |           |              |              |              |              |
|   |                                  | 2021                          |           | 2021         |              | Total Farms  |              |
| Revenue                                   | Loan Size                        | Count                         | Dollar    |              |              |              |              |
|   |                                  | #                             | %         | \$ 000s      | \$ %         | %            |              |
| Small Farm                                | Revenue                          | \$1 Million or Less           | 60        | 95.2         | 8,501        | 97.3         | 98.6         |
|   |                                  | Over \$1 Million              | 3         | 4.8          | 240          | 2.7          | 1.2          |
|   |                                  | Unknown                       | 0         | 0.0          | 0            | 0.0          | 0.2          |
|   |                                  | <b>Total</b>                  | <b>63</b> | <b>100.0</b> | <b>8,741</b> | <b>100.0</b> | <b>100.0</b> |
|   | Loan Size                        | \$100,000 or Less             | 31        | 49.2         | 1,229        | 14.1         |              |
|   |                                  | \$100,001 - \$250,000         | 21        | 33.3         | 3,505        | 40.1         |              |
|   |                                  | \$250,001 - \$500,000         | 11        | 17.5         | 4,007        | 45.8         |              |
|   |                                  | <b>Total</b>                  | <b>63</b> | <b>100.0</b> | <b>8,741</b> | <b>100.0</b> |              |
|   | Loan Size & Rev \$1 Mill or Less | \$100,000 or Less             | 28        | 46.7         | 989          | 11.6         |              |
|   |                                  | \$100,001 - \$250,000         | 21        | 35.0         | 3,505        | 41.2         |              |
|   |                                  | \$250,001 - \$500,000         | 11        | 18.3         | 4,007        | 47.1         |              |
|   |                                  | <b>Total</b>                  | <b>60</b> | <b>100.0</b> | <b>8,501</b> | <b>100.0</b> |              |

Originations & Purchases  
2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

## COMMUNITY DEVELOPMENT TEST

### Lending, Investment, and Services Activities

The bank demonstrates adequate responsiveness to the community development needs of its assessment area through community development loans, qualified investments, and community development services as appropriate, considering the bank’s capacity and the need and the availability of such opportunities for community development in the bank’s assessment area.

### Lending

The bank provided eight community development loans totaling \$2.2 million within the assessment area. This is an increase since the previous exam at which the bank originated four community development loans totaling \$1.6 million. All eight loans were for affordable housing purposes which have a large impact on low- and moderate-income families. Loans focused on affordable housing have a large impact as a community representative stated it is a need in the assessment area. Overall, the increase in community development lending in the Eastern non-MSA since the previous examination demonstrates the bank’s responsiveness to the credit needs of its community.

## Investments

The bank did not originate any qualified investments in the Eastern Non-MSA during the review period. At the previous evaluation, three investments totaling \$3.4 million were made. However, First Bank of Berne made 128 qualified donations totaling approximately \$148,696. This is a slight increase since the previous evaluation where the bank made 53 donations totaling \$125,262. Donations were made to organizations that worked with affordable housing, economic development, and social services.

## Services

Bank staff provided a total of 2,469 hours of community development services to 61 unique organizations located in the assessment area. The bank's performance was an increase of community services activities since the previous evaluation where the bank provided 1,933 service hours to 21 unique organizations. The majority of service hours involved bank staff serving as board members and providing financial expertise for non-profit organizations, in addition to serving on boards, bank staff worked with low- and moderate-income families.

The following table presents the bank's community development activities during the evaluation period.

| Summary of CD Activities<br>January 8, 2019 – January 31, 2022 |                    |           |                      |          |                                      |          |                    |          |        |           |
|--|--------------------|-----------|----------------------|----------|--------------------------------------|----------|--------------------|----------|--------|-----------|
| Type of Activity   | Affordable Housing |           | Economic Development |          | Activities that Revitalize/Stabilize |          | Community Services |          | Totals |           |
|  | #                  | \$/Hours  | #                    | \$/Hours | #                                    | \$/Hours | #                  | \$/Hours | #      | \$/Hours  |
| Lending  | 8                  | 2,159,999 | 0                    | 0        | 0                                    | 0        | 0                  | 0        | 8      | 2,159,999 |
| Investment   | 0                  | 0         | 0                    | 0        | 0                                    | 0        | 0                  | 0        | 0      | 0         |
| Donations  | 1                  | 1,000     | 6                    | 8,200    | 0                                    | 0        | 121                | 139,496  | 128    | 148,696   |
| Services   | 4                  | 81        | 13                   | 486      | 0                                    | 0        | 44                 | 1902     | 61     | 2,469     |

## **KOKOMO, INDIANA MSA #29020 – FULL REVIEW**

### **SCOPE OF EXAMINATION**

Full scope examination procedures were used to evaluate the bank's performance in the Kokomo, Indiana MSA #29020 assessment area. The scope of this section is consistent with the scope of the examination described within the institution summary. For further information, refer to the "Scope of Examination" section for details.

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN KOKOMO, INDIANA MSA #29020**

The bank's Kokomo, Indiana MSA #29020 assessment area is comprised of Howard County in its entirety. The MSA has 20 census tracts, of which two are low-income, four are moderate-income, nine are middle-income and five are upper income census tracts. The bank operates one branch and cash-only ATM in the city of Kokomo in an upper-income census tract. The assessment area remains unchanged since the previous examination.

In 2020, 207 total HMDA reporters within the assessment area originated or purchased 3,913 HMDA-reportable loans. First Bank of Berne ranked 35th among HMDA reporting institutions by originating 13 HMDA-reportable loans in 2020. By comparison, the first and second ranked financial institutions were Solidarity Community Federal Credit Union and Ruoff Mortgage Company, Inc. with 394 and 375 originations and purchase transactions, respectively.

According to the June 30, 2021, FDIC Deposit Market Share Report, First Bank of Berne ranked ninth out of nine FDIC-insured financial institutions operating in the assessment area with 1.2 percent of the deposit market share. For comparison, the top two institutions by market share are First Farmers Bank & Trust Co. (27.5 percent) and Community First Bank of Indiana (23.2 percent). For reference, the nine total FDIC-insured depository institutions operating in the assessment area maintained a total of 23 branch offices, one of which belongs to First Bank of Berne.

| Assessment Area: 2021 Kokomo, IN MSA 29020                                       |                                 |                                    |                          |                  |  |                      |                           |              |
|--|---------------------------------|------------------------------------|--------------------------|------------------|--|----------------------|---------------------------|--------------|
| Income Categories  | Tract Distribution              |                                    | Families by Tract Income |                  | Families < Poverty Level as % of Families by Tract |                      | Families by Family Income |              |
|  | #                               | %                                  | #                        | %                | #  | %                    | #                         | %            |
| Low-income   | 2                               | 10.0                               | 1,791                    | 8.0              | 602  | 33.6                 | 4,955                     | 22.2         |
| Moderate-income  | 4                               | 20.0                               | 3,434                    | 15.4             | 849  | 24.7                 | 3,704                     | 16.6         |
| Middle-income  | 9                               | 45.0                               | 10,461                   | 47.0             | 1,276  | 12.2                 | 4,704                     | 21.1         |
| Upper-income   | 5                               | 25.0                               | 6,595                    | 29.6             | 231  | 3.5                  | 8,918                     | 40.0         |
| Unknown-income   | 0                               | 0.0                                | 0                        | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| <b>Total Assessment Area</b>   | <b>20</b>                       | <b>100.0</b>                       | <b>22,281</b>            | <b>100.0</b>     | <b>2,958</b>                                       | <b>13.3</b>          | <b>22,281</b>             | <b>100.0</b> |
|  | Housing Units by Tract          | Housing Types by Tract             |                          |                  |  |                      |                           |              |
|  |                                 | Owner-Occupied                     |                          |                  | Rental   |                      | Vacant                    |              |
|  |                                 | #                                  | %                        | %                | #  | %                    | #                         | %            |
| Low-income   | 3,862                           | 1,497                              | 6.3                      | 38.8             | 1,748  | 45.3                 | 617                       | 16.0         |
| Moderate-income  | 7,327                           | 3,372                              | 14.2                     | 46.0             | 2,460  | 33.6                 | 1,495                     | 20.4         |
| Middle-income  | 17,841                          | 11,558                             | 48.7                     | 64.8             | 4,830  | 27.1                 | 1,453                     | 8.1          |
| Upper-income   | 9,619                           | 7,304                              | 30.8                     | 75.9             | 1,644  | 17.1                 | 671                       | 7.0          |
| Unknown-income   | 0                               | 0                                  | 0.0                      | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| <b>Total Assessment Area</b>   | <b>38,649</b>                   | <b>23,731</b>                      | <b>100.0</b>             | <b>61.4</b>      | <b>10,682</b>                                      | <b>27.6</b>          | <b>4,236</b>              | <b>11.0</b>  |
|  | Total Businesses by Tract       | Businesses by Tract & Revenue Size |                          |                  |  |                      |                           |              |
|  |                                 | Less Than or = \$1 Million         |                          | Over \$1 Million |  | Revenue Not Reported |                           |              |
|  |                                 | #                                  | %                        | #                | %  | #                    | %                         |              |
| Low-income   | 310                             | 10.9                               | 286                      | 10.9             | 23   | 12.4                 | 1                         | 3.0          |
| Moderate-income  | 542                             | 19.1                               | 497                      | 18.9             | 37   | 20.0                 | 8                         | 24.2         |
| Middle-income  | 1,307                           | 46.0                               | 1,196                    | 45.6             | 92   | 49.7                 | 19                        | 57.6         |
| Upper-income   | 683                             | 24.0                               | 645                      | 24.6             | 33   | 17.8                 | 5                         | 15.2         |
| Unknown-income   | 0                               | 0.0                                | 0                        | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| <b>Total Assessment Area</b>   | <b>2,842</b>                    | <b>100.0</b>                       | <b>2,624</b>             | <b>100.0</b>     | <b>185</b>   | <b>100.0</b>         | <b>33</b>                 | <b>100.0</b> |
|  | Percentage of Total Businesses: |                                    |                          | 92.3             |  | 6.5                  |                           | 1.2          |
|  | Total Farms by Tract            | Farms by Tract & Revenue Size      |                          |                  |  |                      |                           |              |
|  |                                 | Less Than or = \$1 Million         |                          | Over \$1 Million |  | Revenue Not Reported |                           |              |
|  |                                 | #                                  | %                        | #                | %  | #                    | %                         |              |
| Low-income   | 2                               | 1.6                                | 2                        | 1.6              | 0  | 0.0                  | 0                         | 0.0          |
| Moderate-income  | 1                               | 0.8                                | 1                        | 0.8              | 0  | 0.0                  | 0                         | 0.0          |
| Middle-income  | 61                              | 49.6                               | 61                       | 50.0             | 0  | 0.0                  | 0                         | 0.0          |
| Upper-income   | 59                              | 48.0                               | 58                       | 47.5             | 1  | 100.0                | 0                         | 0.0          |
| Unknown-income   | 0                               | 0.0                                | 0                        | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| <b>Total Assessment Area</b>   | <b>123</b>                      | <b>100.0</b>                       | <b>122</b>               | <b>100.0</b>     | <b>1</b>   | <b>100.0</b>         | <b>0</b>                  | <b>0.0</b>   |
|  | Percentage of Total Farms:      |                                    |                          | 99.2             |  | 0.8                  |                           | 0.0          |
| 2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS |                                 |                                    |                          |                  |  |                      |                           |              |
| Note: Percentages may not add to 100.0 percent due to rounding                   |                                 |                                    |                          |                  |  |                      |                           |              |

## Population Change

The following table presents the population trends for the assessment area and the state of Indiana. According to 2011-2015 U.S. Census Bureau American Community Survey (ACS) population demographics, the population within the assessment area is 82,765, which has remained stable since 2010. By comparison, the state of Indiana experienced an increase in population at 1.3 percent.

| Population Change  |                 |                      |                       |
|--|-----------------|----------------------|-----------------------|
| Area   | 2010 Population | 2011-2015 Population | Percentage Change (%) |
| Howard County  | 82,752          | 82,765               | 0.0                   |
| Indiana  | 6,483,802       | 6,568,645            | 1.3                   |
| <i>Source: 2010 – U.S. Census Bureau: Decennial Census<br/>2011-2015 – U.S. Census Bureau: American Community Survey</i> |                 |                      |                       |

## Income Characteristics

According to 2015 U.S. Census Bureau ACS data, the assessment area is comprised of 22,281 families, of which 22.2 percent are designated as low-income, 16.6 percent are moderate-income, 21.1 percent are middle-income, and 40.0 percent are upper income. Approximately 13.3 percent of families residing in the assessment area live below the poverty line.

The following table compares the Median Family Income (MFI) for the assessment area and state of Indiana. According to the 2011-2015 American Community Survey (ACS), the MFI in the assessment area was slightly lower than the rest of the state at \$59,111 compared to \$61,119 in 2015. Over the same period, the MFI in Howard County experienced a slight decrease of 2.2 percent, which was slightly less than the state of Indiana’s decrease of 4.8 percent. A community representative attributed the decrease in MFI in Howard County to a loss of high paying manufacturing jobs in the area. The representative noted that while wages are increasing in service industry jobs, they still fall short of the wages made at manufacturing jobs in the area.

| Median Family Income Change  |                           |                           |                    |
|--|---------------------------|---------------------------|--------------------|
| Area   | 2010 Median Family Income | 2015 Median Family Income | Percent Change (%) |
| Howard County  | \$60,414                  | \$59,111                  | -2.2               |
| Indiana  | \$64,187                  | \$61,119                  | -4.8               |
| <i>Source: 2006-2010 – U.S. Census Bureau: American Community Survey<br/>2011-2015 – U.S. Census Bureau: American Community Survey<br/>Median Family Incomes have been inflation-adjusted and are expressed in 2015 dollars.</i> |                           |                           |                    |

## Housing Characteristics

There are 38,649 housing units within the assessment area. The majority of housing units are owner-occupied at 61.4 percent while the remaining units are comprised of 27.6 percent rental and 11.0 percent vacant.

Renters and homeowners are considered overburdened when housing cost equal 30.0 percent of more of household income. The following table shows the percentage of renters and owners spending more than 30.0 percent of household income on housing costs. The assessment area rental market is generally in line with the rest of the state with 71.5 percent of low-income, 30.7 percent of moderate-income, and 38.4 percent of all renters facing a housing cost burden. Similarly, homeowners in the assessment area are aligned with the state of Indiana, with 56.5 percent of low-income, 28.8 percent moderate-income, and 14.3 percent of all owners facing a cost burden. According to a community representative, there is a need for affordable housing and single-family homes. Despite the need for affordable housing among low-income families, the low cost of living is what attracts families to the area.

| 2011-2015 Housing Cost Burden |                           |                 |             |                          |                 |            |
|-------------------------------|---------------------------|-----------------|-------------|--------------------------|-----------------|------------|
| Area                          | Cost Burden (%) - Renters |                 |             | Cost Burden (%) - Owners |                 |            |
|                               | Low Income                | Moderate Income | All Renters | Low Income               | Moderate Income | All Owners |
| Howard County                 | 71.5                      | 30.7            | 38.4        | 56.5                     | 28.8            | 14.3       |
| Indiana                       | 74.3                      | 33.4            | 41.9        | 59.5                     | 28.0            | 16.1       |

*Cost Burden is housing cost that equals 30 percent or more of household income.*  
*Source: U.S. Department of Housing and Urban Development (HUD), 2011-2015 Comprehensive Housing Affordability Strategy*

## Employment Characteristics

The following table presents the unemployment trends for the assessment area and the state of Indiana from 2016-2020. The assessment area and the state all experienced declining unemployment rates between 2016-2019, before increasing significantly in 2020. A community representative stated that Howard County has a heavy reliance on manufacturing jobs; however, those jobs have declined over time and more sharply recently due to the COVID-19 pandemic.

| Recent Unemployment Rates (%) |      |      |      |      |      |
|-------------------------------|------|------|------|------|------|
| Area                          | 2016 | 2017 | 2018 | 2019 | 2020 |
| Howard County                 | 4.6  | 3.8  | 4.0  | 3.9  | 10.9 |
| Indiana                       | 4.4  | 3.5  | 3.4  | 3.2  | 7.1  |

*Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics*

## **Industry Characteristics**

The primary industries within the assessment area include manufacturing, healthcare, and retail. Employment within the manufacturing industry saw a slight decrease within the previous few years, decreasing 13.0 percent since the first quarter of 2018. As previously noted, the community representative confirmed the area has experienced a decline in manufacturing jobs in the area, which was recently heightened by the COVID-19 pandemic.

## **Community Representative**

One community representative was contacted to provide relevant economic, demographic, and community credit need information within the assessment area. The community representative stated that local and state governments have made significant efforts to encourage job growth. However, the area would benefit from adding skilled and technology positions to maintain the current population. The representative also stated a need for affordable housing and funding to increase housing inventory in the area. The representative indicated financial institutions could also further support the community by providing financial literacy sessions.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KOKOMO, INDIANA MSA #29020**

### **LENDING TEST**

#### **Geographic Distribution of Loans**

Overall, First Bank of Berne's geographic distribution of loans reflects reasonable dispersion throughout the assessment area. The analysis includes HMDA-reportable, small business, and small farm loans; takes into consideration the size and complexity of the bank.

A gap analysis was completed as part of the evaluation. For context, the analysis is based on the bank's record of lending to two low-income census tracts, four moderate-income, nine middle-income, and five upper-income census tracts based on 2020 FFIEC Census data. In 2020, First Bank of Berne originated HMDA-loans in 40.0 percent of census tracts comprising the assessment area. HMDA-loans accounted for 50.0 percent of the lending in low- and moderate-income tracts. Specific to small business and small farm lending, the bank did not originate any of these loans in low- and moderate-income census tracts in 2021 and 2020. Based upon this analysis, it appears there are no conspicuous geographic lending gaps in HMDA lending. Small business and small farm lack of lending is primarily attributed to the bank's geographical presence and loan demand in the market. These two factors present a challenge when lending in low- and moderate-income census tracts in the area.



As previously noted, the lending analysis was driven by the bank's 2020 Home Mortgage Disclosure Act (HMDA) and a sample of the bank's 2021 small business and small farm loans. Please refer to Appendix B for the 2019 HMDA-reportable loan tables and Appendix C for the 2020 small business and small farm loans loan tables. Lastly, all loans received equal weight in the evaluation.

### **HMDA-Reportable Loans**

First Bank of Berne's geographic distribution of HMDA-reportable loans reflects reasonable dispersion throughout the assessment area. Due to the overall low volume of originations, HMDA-reportable lending will be discussed in aggregate and not broken out by individual products to ensure the analysis is more meaningful.

In 2020, First Bank of Berne originated 7.7 percent of its HMDA-reportable loans in low-income census tracts. The bank's performance is slightly above the aggregate of lenders at 4.3 percent and comparable to the percentage of owner-occupied units within the tract at 6.3 percent. The bank originated 15.4 of its HMDA-reportable loans in moderate-income census tracts, resulting in the bank performing above the aggregate of lenders and comparable to the percentage of owner-occupied units within these tracts at 7.5 percent and 14.2 percent, respectively.

Overall, the geographic distribution of HMDA-reportable lending in 2019 was consistent with the bank's performance in 2020 but reflected less lending activity with eight total originations. The 2019 distribution table of HMDA-reportable loans can be found in Appendix B. The following table presents the 2020 geographic distribution of HMDA-reportable loans originated in the assessment area

| Geographic Distribution of HMDA Reportable Loans |                     |                                     |              |              |              |              |              |                           |
|--|---------------------|-------------------------------------|--------------|--------------|--------------|--------------|--------------|---------------------------|
| Assessment Area: 2020 Kokomo, IN MSA 29020       |                     |                                     |              |              |              |              |              |                           |
| Product Type                                     | Tract Income Levels | Bank & Aggregate Lending Comparison |              |              |              |              |              | Owner Occupied % of Units |
|  |                     | 2020                                |              |              | Dollar       |              |              |                           |
|  |                     | Count Bank                          |              | Agg          | Bank         |              | Agg          |                           |
| #  | %                   | %                                   | \$ (000s)    | \$ %         | \$ %         |              |              |                           |
| Home Purchase                                    | Low                 | 0                                   | 0.0          | 7.7          | 0            | 0.0          | 2.6          | 6.3                       |
|  | Moderate            | 1                                   | 50.0         | 9.4          | 43           | 30.3         | 6.0          | 14.2                      |
|  | Middle              | 1                                   | 50.0         | 48.2         | 99           | 69.7         | 45.5         | 48.7                      |
|  | Upper               | 0                                   | 0.0          | 34.6         | 0            | 0.0          | 46.0         | 30.8                      |
|  | Unknown             | 0                                   | 0.0          | 0.0          | 0            | 0.0          | 0.0          | 0.0                       |
|  | <b>Total</b>        | <b>2</b>                            | <b>100.0</b> | <b>100.0</b> | <b>142</b>   | <b>100.0</b> | <b>100.0</b> | <b>100.0</b>              |
| Refinance  | Low                 | 1                                   | 11.1         | 1.3          | 58           | 7.4          | 0.6          | 6.3                       |
|  | Moderate            | 1                                   | 11.1         | 4.5          | 81           | 10.4         | 2.5          | 14.2                      |
|  | Middle              | 4                                   | 44.4         | 49.1         | 377          | 48.4         | 43.9         | 48.7                      |
|  | Upper               | 3                                   | 33.3         | 45.1         | 263          | 33.8         | 53.1         | 30.8                      |
|  | Unknown             | 0                                   | 0.0          | 0.0          | 0            | 0.0          | 0.0          | 0.0                       |
|  | <b>Total</b>        | <b>9</b>                            | <b>100.0</b> | <b>100.0</b> | <b>779</b>   | <b>100.0</b> | <b>100.0</b> | <b>100.0</b>              |
| Home Improvement                                 | Low                 | 0                                   | 0.0          | 2.5          | 0            | 0.0          | 1.5          | 6.3                       |
|  | Moderate            | 0                                   | 0.0          | 16.5         | 0            | 0.0          | 18.6         | 14.2                      |
|  | Middle              | 0                                   | 0.0          | 50.6         | 0            | 0.0          | 46.5         | 48.7                      |
|  | Upper               | 0                                   | 0.0          | 30.4         | 0            | 0.0          | 33.4         | 30.8                      |
|  | Unknown             | 0                                   | 0.0          | 0.0          | 0            | 0.0          | 0.0          | 0.0                       |
|  | <b>Total</b>        | <b>0</b>                            | <b>0.0</b>   | <b>100.0</b> | <b>0</b>     | <b>0.0</b>   | <b>100.0</b> | <b>100.0</b>              |
| Multi-Family                                     | Low                 | 0                                   | 0.0          | 5.6          | 0            | 0.0          | 5.4          | 14.2                      |
|  | Moderate            | 0                                   | 0.0          | 38.9         | 0            | 0.0          | 22.5         | 8.8                       |
|  | Middle              | 0                                   | 0.0          | 44.4         | 0            | 0.0          | 70.7         | 63.6                      |
|  | Upper               | 2                                   | 100.0        | 11.1         | 439          | 100.0        | 1.4          | 13.5                      |
|  | Unknown             | 0                                   | 0.0          | 0.0          | 0            | 0.0          | 0.0          | 0.0                       |
|  | <b>Total</b>        | <b>2</b>                            | <b>100.0</b> | <b>100.0</b> | <b>439</b>   | <b>100.0</b> | <b>100.0</b> | <b>100.0</b>              |
| Other Purpose LOC                                | Low                 | 0                                   | 0.0          | 3.8          | 0            | 0.0          | 0.5          | 6.3                       |
|  | Moderate            | 0                                   | 0.0          | 7.7          | 0            | 0.0          | 2.8          | 14.2                      |
|  | Middle              | 0                                   | 0.0          | 50.0         | 0            | 0.0          | 61.9         | 48.7                      |
|  | Upper               | 0                                   | 0.0          | 38.5         | 0            | 0.0          | 34.8         | 30.8                      |
|  | Unknown             | 0                                   | 0.0          | 0.0          | 0            | 0.0          | 0.0          | 0.0                       |
|  | <b>Total</b>        | <b>0</b>                            | <b>0.0</b>   | <b>100.0</b> | <b>0</b>     | <b>0.0</b>   | <b>100.0</b> | <b>100.0</b>              |
| Other Purpose Closed/Exempt                      | Low                 | 0                                   | 0.0          | 3.4          | 0            | 0.0          | 2.4          | 6.3                       |
|  | Moderate            | 0                                   | 0.0          | 11.2         | 0            | 0.0          | 7.6          | 14.2                      |
|  | Middle              | 0                                   | 0.0          | 50.0         | 0            | 0.0          | 45.0         | 48.7                      |
|  | Upper               | 0                                   | 0.0          | 35.3         | 0            | 0.0          | 45.0         | 30.8                      |
|  | Unknown             | 0                                   | 0.0          | 0.0          | 0            | 0.0          | 0.0          | 0.0                       |
|  | <b>Total</b>        | <b>0</b>                            | <b>0.0</b>   | <b>100.0</b> | <b>0</b>     | <b>0.0</b>   | <b>100.0</b> | <b>100.0</b>              |
| Loan Purpose Not Applicable                      | Low                 | 0                                   | 0.0          | 2.2          | 0            | 0.0          | 0.9          | 6.3                       |
|  | Moderate            | 0                                   | 0.0          | 13.5         | 0            | 0.0          | 6.5          | 14.2                      |
|  | Middle              | 0                                   | 0.0          | 50.6         | 0            | 0.0          | 51.6         | 48.7                      |
|  | Upper               | 0                                   | 0.0          | 33.7         | 0            | 0.0          | 41.0         | 30.8                      |
|  | Unknown             | 0                                   | 0.0          | 0.0          | 0            | 0.0          | 0.0          | 0.0                       |
|  | <b>Total</b>        | <b>0</b>                            | <b>0.0</b>   | <b>100.0</b> | <b>0</b>     | <b>0.0</b>   | <b>100.0</b> | <b>100.0</b>              |
| HMDA Totals                                      | Low                 | 1                                   | 7.7          | 4.3          | 58           | 4.3          | 1.7          | 6.3                       |
|  | Moderate            | 2                                   | 15.4         | 7.5          | 124          | 9.1          | 5.3          | 14.2                      |
|  | Middle              | 5                                   | 38.5         | 48.8         | 476          | 35.0         | 46.3         | 48.7                      |
|  | Upper               | 5                                   | 38.5         | 39.5         | 702          | 51.6         | 46.6         | 30.8                      |
|  | Unknown             | 0                                   | 0.0          | 0.0          | 0            | 0.0          | 0.0          | 0.0                       |
|  | <b>Total</b>        | <b>13</b>                           | <b>100.0</b> | <b>100.0</b> | <b>1,360</b> | <b>100.0</b> | <b>100.0</b> | <b>100.0</b>              |

Originations & Purchases  
2016 FFIEC Census Data  
Note: Percentages may not add to 100.0 percent due to rounding

### Small Business

The geographic distribution of small business loans reflects a poor dispersion throughout the assessment area. First Bank of Berne did not originate any small business loans in low-, or moderate-income census tracts, resulting in the bank performing well below the total businesses within the assessment area at 10.9 percent and 19.1 percent, respectively. The bank had one small business loan originated within the upper-income census tract. The following table presents the 2021 geographic distribution of small business loans originated in the assessment area.

| <b>Geographic Distribution of Small Business Loans</b>                           |                     |                               |              |                  |              |                  |
|--|---------------------|-------------------------------|--------------|------------------|--------------|------------------|
| <b>Assessment Area: 2021 Kokomo, IN MSA 29020</b>                                |                     |                               |              |                  |              |                  |
|  | Tract Income Levels | Bank & Demographic Comparison |              |                  |              |                  |
|  |                     | Count Bank                    |              | 2021 Dollar Bank |              | Total Businesses |
|  |                     | #                             | %            | \$ 000s          | \$ %         | %                |
| Small Business   | Low                 | 0                             | 0.0          | 0                | 0.0          | 10.9             |
|  | Moderate            | 0                             | 0.0          | 0                | 0.0          | 19.1             |
|  | Middle              | 0                             | 0.0          | 0                | 0.0          | 46.0             |
|  | Upper               | 1                             | 100.0        | 13               | 100.0        | 24.0             |
|  | Unknown             | 0                             | 0.0          | 0                | 0.0          | 0.0              |
|  | <b>Total</b>        | <b>1</b>                      | <b>100.0</b> | <b>13</b>        | <b>100.0</b> | <b>100.0</b>     |
| 2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS |                     |                               |              |                  |              |                  |
| <i>Note: Percentages may not add to 100.0 percent due to rounding</i>            |                     |                               |              |                  |              |                  |

### Small Farm

The geographic distribution of small farm loans reflects a reasonable dispersion throughout the assessment area. First Bank of Berne did not originate any small farm loans in low-, or moderate-income census tracts, however, the bank’s performance was in-line with the percentage of total farms in the area with low-, and moderate-income census tracts representing 1.6 and 0.8 percent, respectively. Both of the bank’s small farm loans were originated in the upper-income census tracts, resulting in the bank performing above the percentage of farms in the area at 48.0 percent. Overall, the lack of small farm loan originations in the low-, and moderate-income census tracts in 2021 is considered reasonable given the limited number of farms within the tracts, resulting in less opportunity for small farm lending. The following table presents the 2021 geographic distribution of small farm loans originated in the assessment area.

| Geographic Distribution of Small Farm Loans |                     |                               |              |            |              |              |
|---|---------------------|-------------------------------|--------------|------------|--------------|--------------|
| Assessment Area: 2021 Kokomo, IN MSA 29020  |                     |                               |              |            |              |              |
|   | Tract Income Levels | Bank & Demographic Comparison |              |            |              | Total Farms  |
|   |                     | Count                         |              | Dollar     |              |              |
|   |                     | Bank                          |              | Bank       |              |              |
|   |                     | #                             | %            | \$ 000s    | \$ %         | %            |
| Small Farm                                  | Low                 | 0                             | 0.0          | 0          | 0.0          | 1.6          |
|   | Moderate            | 0                             | 0.0          | 0          | 0.0          | 0.8          |
|   | Middle              | 0                             | 0.0          | 0          | 0.0          | 49.6         |
|   | Upper               | 2                             | 100.0        | 297        | 100.0        | 48.0         |
|   | Unknown             | 0                             | 0.0          | 0          | 0.0          | 0.0          |
|   | <b>Total</b>        | <b>2</b>                      | <b>100.0</b> | <b>297</b> | <b>100.0</b> | <b>100.0</b> |

2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

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

First Bank of Berne demonstrates a distribution of loans to individuals of different income levels (including low- and moderate-income individuals) and businesses and farms of different sizes that is reasonable given the demographics of the bank's assessment area.

### HMDA- Reportable Loans

The borrower distribution of HMDA-reportable loans reflects poor penetration among individuals of different income levels. Due to the overall low volume of originations, HMDA-reportable lending will be discussed in aggregate and not broken out by individual products to ensure the analysis is more meaningful.

In 2020, First Bank of Berne had zero HMDA-reportable loans to low-income borrowers. The bank's performance was below the aggregate of lenders at 8.6 percent and significantly below the percentage of low-income families in the assessment area at 22.2 percent. The bank originated 7.7 percent of its HMDA-reportable loans to moderate-income borrowers, performing below the aggregate of lenders and the percentage of moderate-income families at 21.2 percent and 16.6 percent, respectively.

The following table presents the 2020 borrower distribution of HMDA-reportable loans originated in the assessment area. The 2019 borrower distribution table of HMDA-reportable loans can be found in Appendix B. Overall, the borrower distribution of HMDA-reportable lending in 2019 was consistent with the bank's performance in 2020.

| <b>Borrower Distribution of HMDA Reportable Loans</b>   |                        |                                     |           |              |              |              |              |                             |
|---|------------------------|-------------------------------------|-----------|--------------|--------------|--------------|--------------|-----------------------------|
| <b>Assessment Area: 2020 Kokomo, IN MSA 29020</b>   |                        |                                     |           |              |              |              |              |                             |
| Product Type  | Borrower Income Levels | Bank & Aggregate Lending Comparison |           |              |              |              |              | Families by Family Income % |
|   |                        | 2020                                |           |              | 2020         |              |              |                             |
|   |                        | Count Bank                          |           | Agg          | Dollar Bank  |              | Agg          |                             |
|   |                        | #                                   | %         | %            | \$(000s)     | \$ %         | \$ %         |                             |
| Home Purchase   | Low                    | 0                                   | 0.0       | 12.9         | 0            | 0.0          | 6.6          | 22.2                        |
|   | Moderate               | 0                                   | 0.0       | 26.8         | 0            | 0.0          | 21.2         | 16.6                        |
|   | Middle                 | 1                                   | 50.0      | 23.0         | 43           | 30.3         | 24.6         | 21.1                        |
|   | Upper                  | 1                                   | 50.0      | 24.0         | 99           | 69.7         | 33.9         | 40.0                        |
|   | Unknown                | 0                                   | 0.0       | 13.3         | 0            | 0.0          | 13.7         | 0.0                         |
|   | <b>Total</b>           |                                     | <b>2</b>  | <b>100.0</b> | <b>100.0</b> | <b>142</b>   | <b>100.0</b> | <b>100.0</b>                |
| Refinance   | Low                    | 0                                   | 0.0       | 5.2          | 0            | 0.0          | 2.5          | 22.2                        |
|   | Moderate               | 1                                   | 11.1      | 17.5         | 62           | 8.0          | 12.0         | 16.6                        |
|   | Middle                 | 2                                   | 22.2      | 22.2         | 185          | 23.7         | 18.8         | 21.1                        |
|   | Upper                  | 2                                   | 22.2      | 33.9         | 250          | 32.1         | 41.5         | 40.0                        |
|   | Unknown                | 4                                   | 44.4      | 21.2         | 282          | 36.2         | 25.2         | 0.0                         |
|   | <b>Total</b>           |                                     | <b>9</b>  | <b>100.0</b> | <b>100.0</b> | <b>779</b>   | <b>100.0</b> | <b>100.0</b>                |
| Home Improvement  | Low                    | 0                                   | 0.0       | 10.1         | 0            | 0.0          | 6.8          | 22.2                        |
|   | Moderate               | 0                                   | 0.0       | 17.7         | 0            | 0.0          | 15.1         | 16.6                        |
|   | Middle                 | 0                                   | 0.0       | 22.8         | 0            | 0.0          | 17.6         | 21.1                        |
|   | Upper                  | 0                                   | 0.0       | 45.6         | 0            | 0.0          | 55.2         | 40.0                        |
|   | Unknown                | 0                                   | 0.0       | 3.8          | 0            | 0.0          | 5.3          | 0.0                         |
|   | <b>Total</b>           |                                     | <b>0</b>  | <b>0.0</b>   | <b>100.0</b> | <b>0</b>     | <b>0.0</b>   | <b>100.0</b>                |
| Multi-Family  | Low                    | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 22.2                        |
|   | Moderate               | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 16.6                        |
|   | Middle                 | 0                                   | 0.0       | 5.6          | 0            | 0.0          | 0.9          | 21.1                        |
|   | Upper                  | 2                                   | 100.0     | 16.7         | 439          | 100.0        | 1.7          | 40.0                        |
|   | Unknown                | 0                                   | 0.0       | 77.8         | 0            | 0.0          | 97.4         | 0.0                         |
|   | <b>Total</b>           |                                     | <b>2</b>  | <b>100.0</b> | <b>100.0</b> | <b>439</b>   | <b>100.0</b> | <b>100.0</b>                |
| Other Purpose LOC   | Low                    | 0                                   | 0.0       | 3.8          | 0            | 0.0          | 7.9          | 22.2                        |
|   | Moderate               | 0                                   | 0.0       | 26.9         | 0            | 0.0          | 18.7         | 16.6                        |
|   | Middle                 | 0                                   | 0.0       | 26.9         | 0            | 0.0          | 27.8         | 21.1                        |
|   | Upper                  | 0                                   | 0.0       | 42.3         | 0            | 0.0          | 45.7         | 40.0                        |
|   | Unknown                | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 0.0                         |
|   | <b>Total</b>           |                                     | <b>0</b>  | <b>0.0</b>   | <b>100.0</b> | <b>0</b>     | <b>0.0</b>   | <b>100.0</b>                |
| Other Purpose Closed/Exempt   | Low                    | 0                                   | 0.0       | 9.5          | 0            | 0.0          | 4.4          | 22.2                        |
|   | Moderate               | 0                                   | 0.0       | 18.1         | 0            | 0.0          | 16.6         | 16.6                        |
|   | Middle                 | 0                                   | 0.0       | 34.5         | 0            | 0.0          | 28.9         | 21.1                        |
|   | Upper                  | 0                                   | 0.0       | 37.9         | 0            | 0.0          | 50.1         | 40.0                        |
|   | Unknown                | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 0.0                         |
|   | <b>Total</b>           |                                     | <b>0</b>  | <b>0.0</b>   | <b>100.0</b> | <b>0</b>     | <b>0.0</b>   | <b>100.0</b>                |
| Loan Purpose Not Applicable   | Low                    | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 22.2                        |
|   | Moderate               | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 16.6                        |
|   | Middle                 | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 21.1                        |
|   | Upper                  | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 40.0                        |
|   | Unknown                | 0                                   | 0.0       | 100.0        | 0            | 0.0          | 100.0        | 0.0                         |
|   | <b>Total</b>           |                                     | <b>0</b>  | <b>0.0</b>   | <b>100.0</b> | <b>0</b>     | <b>0.0</b>   | <b>100.0</b>                |
| HMDA Totals   | Low                    | 0                                   | 0.0       | 8.6          | 0            | 0.0          | 4.2          | 22.2                        |
|   | Moderate               | 1                                   | 7.7       | 21.2         | 62           | 4.6          | 15.2         | 16.6                        |
|   | Middle                 | 3                                   | 23.1      | 22.4         | 228          | 16.8         | 20.1         | 21.1                        |
|   | Upper                  | 5                                   | 38.5      | 29.1         | 788          | 57.9         | 35.6         | 40.0                        |
|   | Unknown                | 4                                   | 30.8      | 18.7         | 282          | 20.7         | 24.9         | 0.0                         |
|   | <b>Total</b>           |                                     | <b>13</b> | <b>100.0</b> | <b>100.0</b> | <b>1,360</b> | <b>100.0</b> | <b>100.0</b>                |
| Originations & Purchases<br>2016 FFIEC Census Data<br><i>Note: Percentages may not add to 100.0 percent due to rounding</i> |                        |                                     |           |              |              |              |              |                             |

### Small Business Loans

The distribution of small business loans reflects a reasonable penetration among businesses of different revenue sizes. The 2021 sample includes one small business loan which was made to a business with annual revenues of \$1 million or less. The bank’s performance is above the total small businesses operating in the assessment area at 92.3 percent. Small business lending rating is based on the number of loans originated in the area. While the bank’s performance is minimal to small businesses in the assessment area, high competition along with the bank’s geographical location makes it challenging for the bank to increase its small business lending. The following table presents the 2021 borrower distribution of small business loans originated in the assessment area.

| Small Business Lending By Revenue & Loan Size |                                  |                               |          |              |           |                  |              |
|---|----------------------------------|-------------------------------|----------|--------------|-----------|------------------|--------------|
| Assessment Area: 2021 Kokomo, IN MSA 29020    |                                  |                               |          |              |           |                  |              |
| Product Type                                  |                                  | Bank & Demographic Comparison |          |              |           |                  |              |
|   |                                  | 2021                          |          |              |           |                  |              |
|   |                                  | Count Bank                    |          | Dollar Bank  |           | Total Businesses |              |
|   |                                  | #                             | %        | \$ 000s      | \$ %      | %                |              |
| Small Business                                | Revenue                          | \$1 Million or Less           | 1        | 100.0        | 13        | 100.0            | 92.3         |
|   |                                  | Over \$1 Million              | 0        | 0.0          | 0         | 0.0              | 6.5          |
|   |                                  | Unknown                       | 0        | 0.0          | 0         | 0.0              | 1.2          |
|   |                                  | <b>Total</b>                  | <b>1</b> | <b>100.0</b> | <b>13</b> | <b>100.0</b>     | <b>100.0</b> |
|   | Loan Size                        | \$100,000 or Less             | 1        | 100.0        | 13        | 100.0            |              |
|   |                                  | \$100,001 - \$250,000         | 0        | 0.0          | 0         | 0.0              |              |
|   |                                  | \$250,001 - \$1 Million       | 0        | 0.0          | 0         | 0.0              |              |
|   |                                  | <b>Total</b>                  | <b>1</b> | <b>100.0</b> | <b>13</b> | <b>100.0</b>     |              |
|   | Loan Size & Rev \$1 Mill or Less | \$100,000 or Less             | 1        | 100.0        | 13        | 100.0            |              |
|   |                                  | \$100,001 - \$250,000         | 0        | 0.0          | 0         | 0.0              |              |
|   |                                  | \$250,001 - \$1 Million       | 0        | 0.0          | 0         | 0.0              |              |
|   |                                  | <b>Total</b>                  | <b>1</b> | <b>100.0</b> | <b>13</b> | <b>100.0</b>     |              |

Originations & Purchases  
2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

### Small Farm Loans

The borrower distribution of small farm loans reflects reasonable dispersion among farms of different sizes. The bank originated 100.0 percent of its farm loans to farms with revenues equal to or less than \$ 1 million, consistent with the presence of total small farms operating in the assessment area at 99.2 percent. One small farm loan originated was in the amount of \$100,000 or less, which is considered the most beneficial to small farms indicating the bank’s willingness to meet the credit needs of small farms. The following table shows the bank’s distribution of small farm loans in 2021 by revenue and loan size.

| <b>Small Farm Lending By Revenue &amp; Loan Size</b> |                                  |                               |          |              |            |              |              |
|--|----------------------------------|-------------------------------|----------|--------------|------------|--------------|--------------|
| <b>Assessment Area: 2021 Kokomo, IN MSA 29020</b>    |                                  |                               |          |              |            |              |              |
| Product Type   |                                  | Bank & Demographic Comparison |          |              |            |              |              |
|  |                                  | 2021                          |          |              |            |              |              |
|  |                                  | Count Bank                    |          | Dollar Bank  |            | Total Farms  |              |
|  |                                  | #                             | %        | \$ 000s      | \$ %       | %            |              |
| Small Farm   | Revenue                          | \$1 Million or Less           | 2        | 100.0        | 297        | 100.0        | 99.2         |
|  |                                  | Over \$1 Million              | 0        | 0.0          | 0          | 0.0          | 0.8          |
|  |                                  | Unknown                       | 0        | 0.0          | 0          | 0.0          | 0.0          |
|  |                                  | <b>Total</b>                  | <b>2</b> | <b>100.0</b> | <b>297</b> | <b>100.0</b> | <b>100.0</b> |
|  | Loan Size                        | \$100,000 or Less             | 1        | 50.0         | 25         | 8.4          |              |
|  |                                  | \$100,001 - \$250,000         | 0        | 0.0          | 0          | 0.0          |              |
|  |                                  | \$250,001 - \$500,000         | 1        | 50.0         | 272        | 91.6         |              |
|  |                                  | <b>Total</b>                  | <b>2</b> | <b>100.0</b> | <b>297</b> | <b>100.0</b> |              |
|  | Loan Size & Rev \$1 Mill or Less | \$100,000 or Less             | 1        | 50.0         | 25         | 8.4          |              |
|  |                                  | \$100,001 - \$250,000         | 0        | 0.0          | 0          | 0.0          |              |
|  |                                  | \$250,001 - \$500,000         | 1        | 50.0         | 272        | 91.6         |              |
|  |                                  | <b>Total</b>                  | <b>2</b> | <b>100.0</b> | <b>297</b> | <b>100.0</b> |              |

Originations & Purchases  
2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

## COMMUNITY DEVELOPMENT TEST

### Lending, Investment, and Services Activities

The bank demonstrates adequate responsiveness to the community development needs of its assessment area through community development loans, qualified investments, and community development services as appropriate, considering the bank’s capacity and need and the availability of such opportunities for community development in the bank’s assessment area.

### Lending

During the review period, the bank originated two community development loans for affordable housing purposes for a total of \$438,712 within the assessment area. Affordable housing was identified as a critical need by a community representative. Community development lending decreased since the previous evaluation, in which the bank originated two community development loans totaling \$4.5 million.

### Investments

The bank originated three qualified investments during this evaluation period totaling approximately \$3.2 million towards affordable housing and community services. This represents a significant increase as no investments were originated in this assessment area during the previous evaluation. In addition to the investments, First Bank of Berne made 56 qualified donations totaling approximately \$54,015. This is an increase from 12 qualified donations totaling \$23,275 during the previous evaluation within the assessment area. Donations were made to organizations that contribute to economic development, education, and social services.

### Services

Bank staff provided a total of 170 hours of community development services to four unique organizations located in the assessment area, which is similar to the previous evaluation where the bank provided 196 service hours to four organizations. The majority of service hours involved bank staff serving as board members providing financial expertise for non-profit organizations, in addition to serving on boards working with low- and moderate-income families.

| Summary of CD Activities<br>January 8, 2019 – January 31, 2022 |                    |           |                      |          |                                      |          |                    |           |        |           |
|--|--------------------|-----------|----------------------|----------|--------------------------------------|----------|--------------------|-----------|--------|-----------|
| Type of Activity   | Affordable Housing |           | Economic Development |          | Activities that Revitalize/Stabilize |          | Community Services |           | Totals |           |
|  | #                  | \$/Hours  | #                    | \$/Hours | #                                    | \$/Hours | #                  | \$/Hours  | #      | \$/Hours  |
| <b>Lending</b>   | 1                  | 438,712   | 0                    | 0        | 0                                    | 0        | 0                  | 0         | 1      | 438,712   |
| <b>Investment</b>  | 2                  | 2,205,684 | 0                    | 0        | 0                                    | 0        | 1                  | 1,000,000 | 3      | 3,205,684 |
| <b>Donations</b>   | 0                  | 0         | 3                    | 2,750    | 0                                    | 0        | 53                 | 51,265    | 56     | 54,015    |
| <b>Services</b>  | 0                  | 0         | 0                    | 0        | 0                                    | 0        | 4                  | 170       | 4      | 170       |



## WESTERN INDIANA NON-MSA – LIMITED REVIEW

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN WESTERN INDIANA

The bank's Western Indiana Non-MSA assessment area is comprised of Miami County in its entirety. Based on 2020 FFIEC Census data, the census tract composition includes two moderate-income and eight middle-income census tracts. The bank operates a branch office with cash-only ATM in the city of Peru, Indiana in a middle-income census tract. None of the middle-income census tracts are designated as distressed or underserved. The assessment area remains unchanged since the previous evaluation.

In 2020, 110 total HMDA reporters within the assessment area originated or purchased HMDA-reportable loans totaling 957 by number. First Bank of Berne originated 22 of these loans, ranking eighth among HMDA reporting institutions. By comparison, the first and second ranked financial institutions were First Farmers Bank and Trust and Beacon Credit Union, with 92 and 86 originations and purchase transactions respectively.

According to the June 30, 2021, FDIC Deposit Market Share Report, First Bank of Berne ranked second among six FDIC-insured financial institutions operating in the assessment area with 14.6 percent of the deposit market share. For comparison, the top institution by market share is First Farmers Bank and Trust Company (57.8 percent). For reference, the six total FDIC-insured depository institutions operating in the assessment area maintained a total of 8 branch offices, one of which belongs to First Bank of Berne.

The following table displays information about the assessment area by income categories, including details on total families, housing units, businesses, and farms for the year 2021. Please refer to Appendix B for 2020 demographic information.

| Assessment Area: 2021 Western IN Non MSA   |                                 |                                    |                          |                  |  |                      |                           |              |
|--|---------------------------------|------------------------------------|--------------------------|------------------|--|----------------------|---------------------------|--------------|
| Income Categories  | Tract Distribution              |                                    | Families by Tract Income |                  | Families < Poverty Level as % of Families by Tract |                      | Families by Family Income |              |
|  | #                               | %                                  | #                        | %                | #  | %                    | #                         | %            |
| Low-income   | 0                               | 0.0                                | 0                        | 0.0              | 0  | 0.0                  | 1,923                     | 21.1         |
| Moderate-income  | 2                               | 20.0                               | 1,145                    | 12.6             | 208  | 18.2                 | 1,571                     | 17.3         |
| Middle-income  | 8                               | 80.0                               | 7,958                    | 87.4             | 733  | 9.2                  | 1,969                     | 21.6         |
| Upper-income   | 0                               | 0.0                                | 0                        | 0.0              | 0  | 0.0                  | 3,640                     | 40.0         |
| Unknown-income   | 0                               | 0.0                                | 0                        | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| <b>Total Assessment Area</b>   | <b>10</b>                       | <b>100.0</b>                       | <b>9,103</b>             | <b>100.0</b>     | <b>941</b>   | <b>10.3</b>          | <b>9,103</b>              | <b>100.0</b> |
|  | Housing Units by Tract          | Housing Types by Tract             |                          |                  |  |                      |                           |              |
|  |                                 | Owner-Occupied                     |                          | Rental           |  | Vacant               |                           |              |
|  |                                 | #                                  | %                        | #                | %  | #                    | %                         |              |
| Low-income   | 0                               | 0                                  | 0.0                      | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| Moderate-income  | 2,274                           | 1,030                              | 10.7                     | 45.3             | 798  | 35.1                 | 446                       | 19.6         |
| Middle-income  | 13,089                          | 8,576                              | 89.3                     | 65.5             | 2,760  | 21.1                 | 1,753                     | 13.4         |
| Upper-income   | 0                               | 0                                  | 0.0                      | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| Unknown-income   | 0                               | 0                                  | 0.0                      | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| <b>Total Assessment Area</b>   | <b>15,363</b>                   | <b>9,606</b>                       | <b>100.0</b>             | <b>62.5</b>      | <b>3,558</b>                                       | <b>23.2</b>          | <b>2,199</b>              | <b>14.3</b>  |
|  | Total Businesses by Tract       | Businesses by Tract & Revenue Size |                          |                  |  |                      |                           |              |
|  |                                 | Less Than or = \$1 Million         |                          | Over \$1 Million |  | Revenue Not Reported |                           |              |
|  |                                 | #                                  | %                        | #                | %  | #                    | %                         |              |
| Low-income   | 0                               | 0.0                                | 0                        | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| Moderate-income  | 136                             | 12.9                               | 120                      | 12.5             | 14   | 19.4                 | 2                         | 9.1          |
| Middle-income  | 917                             | 87.1                               | 839                      | 87.5             | 58   | 80.6                 | 20                        | 90.9         |
| Upper-income   | 0                               | 0.0                                | 0                        | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| Unknown-income   | 0                               | 0.0                                | 0                        | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| <b>Total Assessment Area</b>   | <b>1,053</b>                    | <b>100.0</b>                       | <b>959</b>               | <b>100.0</b>     | <b>72</b>  | <b>100.0</b>         | <b>22</b>                 | <b>100.0</b> |
|  | Percentage of Total Businesses: |                                    |                          | 91.1             |  | 6.8                  |                           | 2.1          |
|  | Total Farms by Tract            | Farms by Tract & Revenue Size      |                          |                  |  |                      |                           |              |
|  |                                 | Less Than or = \$1 Million         |                          | Over \$1 Million |  | Revenue Not Reported |                           |              |
|  |                                 | #                                  | %                        | #                | %  | #                    | %                         |              |
| Low-income   | 0                               | 0.0                                | 0                        | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| Moderate-income  | 1                               | 0.8                                | 1                        | 0.8              | 0  | 0.0                  | 0                         | 0.0          |
| Middle-income  | 131                             | 99.2                               | 127                      | 99.2             | 3  | 100.0                | 1                         | 100.0        |
| Upper-income   | 0                               | 0.0                                | 0                        | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| Unknown-income   | 0                               | 0.0                                | 0                        | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| <b>Total Assessment Area</b>   | <b>132</b>                      | <b>100.0</b>                       | <b>128</b>               | <b>100.0</b>     | <b>3</b>   | <b>100.0</b>         | <b>1</b>                  | <b>100.0</b> |
|  | Percentage of Total Farms:      |                                    |                          | 97.0             |  | 2.3                  |                           | 0.8          |
| 2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS |                                 |                                    |                          |                  |  |                      |                           |              |
| Note: Percentages may not add to 100.0 percent due to rounding                   |                                 |                                    |                          |                  |  |                      |                           |              |

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WESTERN INDIANA  
NON-MSA**

| <b>Assessment Area</b>  | <b>Lending Test</b> | <b>Community Development Test</b> |
|-------------------------|---------------------|-----------------------------------|
| WESTERN INDIANA NON-MSA | Consistent          | Below                             |

The bank's lending and community development performance in the assessment area is consistent with the institution's overall performance. Please see the lending and community development tables below for more detail. Additional lending tables for the assessment area can be found in Appendix B and C.

| Geographic Distribution of HMDA Reportable Loans |                     |                                     |              |              |              |              |              |                            |
|--|---------------------|-------------------------------------|--------------|--------------|--------------|--------------|--------------|----------------------------|
| Assessment Area: 2020 Western IN Non MSA         |                     |                                     |              |              |              |              |              |                            |
| Product Type                                     | Tract Income Levels | Bank & Aggregate Lending Comparison |              |              |              |              |              |                            |
|  |                     | 2020                                |              |              |              |              |              |                            |
|  |                     | Count Bank                          |              | Agg          | Dollar Bank  |              | Agg          | Owner Occupied % of Units  |
| #  | %                   | %                                   | \$ (000s)    | \$ %         | \$ %         |              |              |                            |
| Home Purchase                                    | Low                 | 0                                   | 0.0          | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | Moderate            | 2                                   | 28.6         | 16.5         | 262          | 40.7         | 11.4         | 10.7                       |
|  | Middle              | 5                                   | 71.4         | 83.5         | 381          | 59.3         | 88.6         | 89.3                       |
|  | Upper               | 0                                   | 0.0          | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | Unknown             | 0                                   | 0.0          | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | <b>Total</b>        | <b>7</b>                            | <b>100.0</b> | <b>100.0</b> | <b>643</b>   | <b>100.0</b> | <b>100.0</b> | <b>100.0</b>               |
| Refinance  | Low                 | 0                                   | 0.0          | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | Moderate            | 0                                   | 0.0          | 5.6          | 0            | 0.0          | 3.8          | 10.7                       |
|  | Middle              | 14                                  | 100.0        | 94.4         | 877          | 100.0        | 96.2         | 89.3                       |
|  | Upper               | 0                                   | 0.0          | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | Unknown             | 0                                   | 0.0          | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | <b>Total</b>        | <b>14</b>                           | <b>100.0</b> | <b>100.0</b> | <b>877</b>   | <b>100.0</b> | <b>100.0</b> | <b>100.0</b>               |
| Home Improvement                                 | Low                 | 0                                   | 0.0          | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | Moderate            | 0                                   | 0.0          | 0.0          | 0            | 0.0          | 0.0          | 10.7                       |
|  | Middle              | 1                                   | 100.0        | 100.0        | 250          | 100.0        | 100.0        | 89.3                       |
|  | Upper               | 0                                   | 0.0          | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | Unknown             | 0                                   | 0.0          | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | <b>Total</b>        | <b>1</b>                            | <b>100.0</b> | <b>100.0</b> | <b>250</b>   | <b>100.0</b> | <b>100.0</b> | <b>100.0</b>               |
| Multi-Family                                     | Low                 | 0                                   | 0.0          | 0.0          | 0            | 0.0          | 0.0          | <b>Multi-Family</b><br>0.0 |
|  | Moderate            | 0                                   | 0.0          | 66.7         | 0            | 0.0          | 87.6         | 15.2                       |
|  | Middle              | 0                                   | 0.0          | 33.3         | 0            | 0.0          | 12.4         | 84.8                       |
|  | Upper               | 0                                   | 0.0          | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | Unknown             | 0                                   | 0.0          | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | <b>Total</b>        | <b>0</b>                            | <b>0.0</b>   | <b>100.0</b> | <b>0</b>     | <b>0.0</b>   | <b>100.0</b> | <b>100.0</b>               |
| Other Purpose LOC                                | Low                 | 0                                   | 0.0          | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | Moderate            | 0                                   | 0.0          | 0.0          | 0            | 0.0          | 0.0          | 10.7                       |
|  | Middle              | 0                                   | 0.0          | 100.0        | 0            | 0.0          | 100.0        | 89.3                       |
|  | Upper               | 0                                   | 0.0          | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | Unknown             | 0                                   | 0.0          | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | <b>Total</b>        | <b>0</b>                            | <b>0.0</b>   | <b>100.0</b> | <b>0</b>     | <b>0.0</b>   | <b>100.0</b> | <b>100.0</b>               |
| Other Purpose Closed/Exempt                      | Low                 | 0                                   | 0.0          | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | Moderate            | 0                                   | 0.0          | 10.0         | 0            | 0.0          | 9.8          | 10.7                       |
|  | Middle              | 0                                   | 0.0          | 90.0         | 0            | 0.0          | 90.2         | 89.3                       |
|  | Upper               | 0                                   | 0.0          | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | Unknown             | 0                                   | 0.0          | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | <b>Total</b>        | <b>0</b>                            | <b>0.0</b>   | <b>100.0</b> | <b>0</b>     | <b>0.0</b>   | <b>100.0</b> | <b>100.0</b>               |
| Loan Purpose Not Applicable                      | Low                 | 0                                   | 0.0          | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | Moderate            | 0                                   | 0.0          | 16.7         | 0            | 0.0          | 13.2         | 10.7                       |
|  | Middle              | 0                                   | 0.0          | 83.3         | 0            | 0.0          | 86.8         | 89.3                       |
|  | Upper               | 0                                   | 0.0          | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | Unknown             | 0                                   | 0.0          | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | <b>Total</b>        | <b>0</b>                            | <b>0.0</b>   | <b>100.0</b> | <b>0</b>     | <b>0.0</b>   | <b>100.0</b> | <b>100.0</b>               |
| HMDA Totals                                      | Low                 | 0                                   | 0.0          | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | Moderate            | 2                                   | 9.1          | 10.3         | 262          | 14.8         | 7.7          | 10.7                       |
|  | Middle              | 20                                  | 90.9         | 89.7         | 1,508        | 85.2         | 92.3         | 89.3                       |
|  | Upper               | 0                                   | 0.0          | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | Unknown             | 0                                   | 0.0          | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | <b>Total</b>        | <b>22</b>                           | <b>100.0</b> | <b>100.0</b> | <b>1,770</b> | <b>100.0</b> | <b>100.0</b> | <b>100.0</b>               |

Originations & Purchases  
2016 FFIEC Census Data  
*Note: Percentages may not add to 100.0 percent due to rounding*

| <b>Geographic Distribution of Small Business Loans</b> |                     |  |            |                    |            |                         |
|--|---------------------|--|------------|--------------------|------------|-------------------------|
| <b>Assessment Area: 2021 Western IN Non MSA</b>        |                     |  |            |                    |            |                         |
|  | Tract Income Levels | <b>Bank &amp; Demographic Comparison</b> |            |                    |            |                         |
|  |                     | <b>2021</b>                              |            |                    |            |                         |
|  |                     | <b>Count Bank</b>                        |            | <b>Dollar Bank</b> |            | <b>Total Businesses</b> |
|  |                     | #  | %          | \$ 000s            | \$ %       | %                       |
| Small Business   | Low                 | 0  | 0.0        | 0                  | 0.0        | 0.0                     |
|  | Moderate            | 0  | 0.0        | 0                  | 0.0        | 12.9                    |
|  | Middle              | 0  | 0.0        | 0                  | 0.0        | 87.1                    |
|  | Upper               | 0  | 0.0        | 0                  | 0.0        | 0.0                     |
|  | Unknown             | 0  | 0.0        | 0                  | 0.0        | 0.0                     |
|  | <b>Total</b>        | <b>0</b>                                 | <b>0.0</b> | <b>0</b>           | <b>0.0</b> | <b>100.0</b>            |

2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

| <b>Geographic Distribution of Small Farm Loans</b> |                     |  |              |                    |              |                    |
|--|---------------------|--|--------------|--------------------|--------------|--------------------|
| <b>Assessment Area: 2021 Western IN Non MSA</b>    |                     |  |              |                    |              |                    |
|  | Tract Income Levels | <b>Bank &amp; Demographic Comparison</b> |              |                    |              |                    |
|  |                     | <b>2021</b>                              |              |                    |              |                    |
|  |                     | <b>Count Bank</b>                        |              | <b>Dollar Bank</b> |              | <b>Total Farms</b> |
|  |                     | #  | %            | \$ 000s            | \$ %         | %                  |
| Small Farm   | Low                 | 0  | 0.0          | 0                  | 0.0          | 0.0                |
|  | Moderate            | 0  | 0.0          | 0                  | 0.0          | 0.8                |
|  | Middle              | 2  | 100.0        | 39                 | 100.0        | 99.2               |
|  | Upper               | 0  | 0.0          | 0                  | 0.0          | 0.0                |
|  | Unknown             | 0  | 0.0          | 0                  | 0.0          | 0.0                |
|  | <b>Total</b>        | <b>2</b>                                 | <b>100.0</b> | <b>39</b>          | <b>100.0</b> | <b>100.0</b>       |

2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

| <b>Borrower Distribution of HMDA Reportable Loans</b>                 |                        |                                     |           |              |              |              |              |                             |
|---|------------------------|-------------------------------------|-----------|--------------|--------------|--------------|--------------|-----------------------------|
| <b>Assessment Area: 2020 Western IN Non MSA</b>                       |                        |                                     |           |              |              |              |              |                             |
| Product Type  | Borrower Income Levels | Bank & Aggregate Lending Comparison |           |              |              |              |              | Families by Family Income % |
|   |                        | 2020                                |           |              |              |              |              |                             |
|   |                        | Count Bank                          |           | Agg          | Dollar Bank  |              | Agg          |                             |
|   |                        | #                                   | %         | %            | \$(000s)     | \$ %         | \$ %         |                             |
| Home Purchase   | Low                    | 1                                   | 14.3      | 16.5         | 27           | 4.2          | 8.9          | 21.1                        |
|   | Moderate               | 1                                   | 14.3      | 31.6         | 79           | 12.3         | 25.5         | 17.3                        |
|   | Middle                 | 0                                   | 0.0       | 18.0         | 0            | 0.0          | 21.4         | 21.6                        |
|   | Upper                  | 5                                   | 71.4      | 19.3         | 537          | 83.5         | 31.2         | 40.0                        |
|   | Unknown                | 0                                   | 0.0       | 14.5         | 0            | 0.0          | 13.1         | 0.0                         |
|   | <b>Total</b>           |                                     | <b>7</b>  | <b>100.0</b> | <b>100.0</b> | <b>643</b>   | <b>100.0</b> | <b>100.0</b>                |
| Refinance   | Low                    | 1                                   | 7.1       | 6.9          | 92           | 10.5         | 3.9          | 21.1                        |
|   | Moderate               | 5                                   | 35.7      | 16.1         | 193          | 22.0         | 11.6         | 17.3                        |
|   | Middle                 | 2                                   | 14.3      | 20.4         | 148          | 16.9         | 18.1         | 21.6                        |
|   | Upper                  | 5                                   | 35.7      | 33.9         | 333          | 38.0         | 40.6         | 40.0                        |
|   | Unknown                | 1                                   | 7.1       | 22.6         | 111          | 12.7         | 25.8         | 0.0                         |
|   | <b>Total</b>           |                                     | <b>14</b> | <b>100.0</b> | <b>100.0</b> | <b>877</b>   | <b>100.0</b> | <b>100.0</b>                |
| Home Improvement  | Low                    | 0                                   | 0.0       | 5.9          | 0            | 0.0          | 2.1          | 21.1                        |
|   | Moderate               | 0                                   | 0.0       | 5.9          | 0            | 0.0          | 3.7          | 17.3                        |
|   | Middle                 | 0                                   | 0.0       | 41.2         | 0            | 0.0          | 19.8         | 21.6                        |
|   | Upper                  | 1                                   | 100.0     | 47.1         | 250          | 100.0        | 74.5         | 40.0                        |
|   | Unknown                | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 0.0                         |
|   | <b>Total</b>           |                                     | <b>1</b>  | <b>100.0</b> | <b>100.0</b> | <b>250</b>   | <b>100.0</b> | <b>100.0</b>                |
| Multi-Family  | Low                    | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 21.1                        |
|   | Moderate               | 0                                   | 0.0       | 33.3         | 0            | 0.0          | 15.1         | 17.3                        |
|   | Middle                 | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 21.6                        |
|   | Upper                  | 0                                   | 0.0       | 33.3         | 0            | 0.0          | 12.4         | 40.0                        |
|   | Unknown                | 0                                   | 0.0       | 33.3         | 0            | 0.0          | 72.5         | 0.0                         |
|   | <b>Total</b>           |                                     | <b>0</b>  | <b>0.0</b>   | <b>100.0</b> | <b>0</b>     | <b>0.0</b>   | <b>100.0</b>                |
| Other Purpose LOC   | Low                    | 0                                   | 0.0       | 16.7         | 0            | 0.0          | 14.8         | 21.1                        |
|   | Moderate               | 0                                   | 0.0       | 16.7         | 0            | 0.0          | 34.0         | 17.3                        |
|   | Middle                 | 0                                   | 0.0       | 25.0         | 0            | 0.0          | 8.9          | 21.6                        |
|   | Upper                  | 0                                   | 0.0       | 33.3         | 0            | 0.0          | 40.8         | 40.0                        |
|   | Unknown                | 0                                   | 0.0       | 8.3          | 0            | 0.0          | 1.6          | 0.0                         |
|   | <b>Total</b>           |                                     | <b>0</b>  | <b>0.0</b>   | <b>100.0</b> | <b>0</b>     | <b>0.0</b>   | <b>100.0</b>                |
| Other Purpose Closed/Exempt   | Low                    | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 21.1                        |
|   | Moderate               | 0                                   | 0.0       | 20.0         | 0            | 0.0          | 15.1         | 17.3                        |
|   | Middle                 | 0                                   | 0.0       | 30.0         | 0            | 0.0          | 20.9         | 21.6                        |
|   | Upper                  | 0                                   | 0.0       | 50.0         | 0            | 0.0          | 64.0         | 40.0                        |
|   | Unknown                | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 0.0                         |
|   | <b>Total</b>           |                                     | <b>0</b>  | <b>0.0</b>   | <b>100.0</b> | <b>0</b>     | <b>0.0</b>   | <b>100.0</b>                |
| Loan Purpose Not Applicable   | Low                    | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 21.1                        |
|   | Moderate               | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 17.3                        |
|   | Middle                 | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 21.6                        |
|   | Upper                  | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 40.0                        |
|   | Unknown                | 0                                   | 0.0       | 100.0        | 0            | 0.0          | 100.0        | 0.0                         |
|   | <b>Total</b>           |                                     | <b>0</b>  | <b>0.0</b>   | <b>100.0</b> | <b>0</b>     | <b>0.0</b>   | <b>100.0</b>                |
| HMDA Totals   | Low                    | 2                                   | 9.1       | 10.9         | 119          | 6.7          | 5.9          | 21.1                        |
|   | Moderate               | 6                                   | 27.3      | 22.3         | 272          | 15.4         | 17.2         | 17.3                        |
|   | Middle                 | 2                                   | 9.1       | 19.6         | 148          | 8.4          | 19.1         | 21.6                        |
|   | Upper                  | 11                                  | 50.0      | 27.8         | 1,120        | 63.3         | 36.7         | 40.0                        |
|   | Unknown                | 1                                   | 4.5       | 19.4         | 111          | 6.3          | 21.1         | 0.0                         |
|   | <b>Total</b>           |                                     | <b>22</b> | <b>100.0</b> | <b>100.0</b> | <b>1,770</b> | <b>100.0</b> | <b>100.0</b>                |
| Originations & Purchases  |                        |                                     |           |              |              |              |              |                             |
| 2016 FFIEC Census Data  |                        |                                     |           |              |              |              |              |                             |
| <i>Note: Percentages may not add to 100.0 percent due to rounding</i> |                        |                                     |           |              |              |              |              |                             |

| <b>Small Business Lending By Revenue &amp; Loan Size</b> |                                  |                               |          |             |          |                  |              |
|--|----------------------------------|-------------------------------|----------|-------------|----------|------------------|--------------|
| <b>Assessment Area: 2021 Western IN Non MSA</b>          |                                  |                               |          |             |          |                  |              |
| Product Type   |                                  | Bank & Demographic Comparison |          |             |          |                  |              |
|  |                                  | Count Bank                    |          | Dollar Bank |          | Total Businesses |              |
|  |                                  | #                             | %        | \$ 000s     | \$ %     |                  | %            |
| Small Business   | Revenue                          | \$1 Million or Less           | 0        | 0.0         | 0        | 0.0              | 91.1         |
|  |                                  | Over \$1 Million              | 0        | 0.0         | 0        | 0.0              | 6.8          |
|  |                                  | Unknown                       | 0        | 0.0         | 0        | 0.0              | 2.1          |
|  |                                  | <b>Total</b>                  | <b>0</b> | <b>0.0</b>  | <b>0</b> | <b>0.0</b>       | <b>100.0</b> |
|  | Loan Size                        | \$100,000 or Less             | 0        | 0.0         | 0        | 0.0              |              |
|  |                                  | \$100,001 - \$250,000         | 0        | 0.0         | 0        | 0.0              |              |
|  |                                  | \$250,001 - \$1 Million       | 0        | 0.0         | 0        | 0.0              |              |
|  |                                  | <b>Total</b>                  | <b>0</b> | <b>0.0</b>  | <b>0</b> | <b>0.0</b>       |              |
|  | Loan Size & Rev \$1 Mill or Less | \$100,000 or Less             | 0        | 0.0         | 0        | 0.0              |              |
|  |                                  | \$100,001 - \$250,000         | 0        | 0.0         | 0        | 0.0              |              |
|  |                                  | \$250,001 - \$1 Million       | 0        | 0.0         | 0        | 0.0              |              |
|  |                                  | <b>Total</b>                  | <b>0</b> | <b>0.0</b>  | <b>0</b> | <b>0.0</b>       |              |

Originations & Purchases  
2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

| <b>Small Farm Lending By Revenue &amp; Loan Size</b> |                                  |                               |          |              |           |              |              |
|--|----------------------------------|-------------------------------|----------|--------------|-----------|--------------|--------------|
| <b>Assessment Area: 2021 Western IN Non MSA</b>      |                                  |                               |          |              |           |              |              |
| Product Type   |                                  | Bank & Demographic Comparison |          |              |           |              |              |
|  |                                  | Count Bank                    |          | Dollar Bank  |           | Total Farms  |              |
|  |                                  | #                             | %        | \$ 000s      | \$ %      |              | %            |
| Small Farm   | Revenue                          | \$1 Million or Less           | 1        | 50.0         | 27        | 69.2         | 97.0         |
|  |                                  | Over \$1 Million              | 1        | 50.0         | 12        | 30.8         | 2.3          |
|  |                                  | Unknown                       | 0        | 0.0          | 0         | 0.0          | 0.8          |
|  |                                  | <b>Total</b>                  | <b>2</b> | <b>100.0</b> | <b>39</b> | <b>100.0</b> | <b>100.0</b> |
|  | Loan Size                        | \$100,000 or Less             | 2        | 100.0        | 39        | 100.0        |              |
|  |                                  | \$100,001 - \$250,000         | 0        | 0.0          | 0         | 0.0          |              |
|  |                                  | \$250,001 - \$500,000         | 0        | 0.0          | 0         | 0.0          |              |
|  |                                  | <b>Total</b>                  | <b>2</b> | <b>100.0</b> | <b>39</b> | <b>100.0</b> |              |
|  | Loan Size & Rev \$1 Mill or Less | \$100,000 or Less             | 1        | 100.0        | 27        | 100.0        |              |
|  |                                  | \$100,001 - \$250,000         | 0        | 0.0          | 0         | 0.0          |              |
|  |                                  | \$250,001 - \$500,000         | 0        | 0.0          | 0         | 0.0          |              |
|  |                                  | <b>Total</b>                  | <b>1</b> | <b>100.0</b> | <b>27</b> | <b>100.0</b> |              |

Originations & Purchases  
2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

## COMMUNITY DEVELOPMENT TEST

First Bank of Berne’s community development performance in Western IN Non-MSA assessment area is below the bank’s community development performance overall.

| Summary of CD Activities<br>January 8, 2019 – January 31, 2022 |                    |          |                      |          |                                      |          |                    |          |        |          |
|--|--------------------|----------|----------------------|----------|--------------------------------------|----------|--------------------|----------|--------|----------|
| Type of Activity   | Affordable Housing |          | Economic Development |          | Activities that Revitalize/Stabilize |          | Community Services |          | Totals |          |
|  | #                  | \$/Hours | #                    | \$/Hours | #                                    | \$/Hours | #                  | \$/Hours | #      | \$/Hours |
| <b>Lending</b>   | 0                  | 0        | 0                    | 0        | 0                                    | 0        | 0                  | 0        | 0      | 0        |
| <b>Investment</b>  | 0                  | 0        | 0                    | 0        | 0                                    | 0        | 0                  | 0        | 0      | 0        |
| <b>Donations</b>   | 1                  | 500      | 0                    | 0        | 0                                    | 0        | 82                 | 87,122   | 83     | 87,622   |
| <b>Services</b>  | 0                  | 0        | 0                    | 0        | 0                                    | 0        | 0                  | 0        | 0      | 0        |



## STATE OF OHIO

### **CRA RATING FOR OHIO: Satisfactory**

**The Lending Test is rated: Satisfactory**

**The Community Development Test is rated: Satisfactory**

The state of Ohio rating is based on the institution's performance in the Ohio Non-MSA assessment area. The geographic distribution of loans reflects reasonable dispersion throughout the assessment area and reasonable penetration among individuals of different income levels, including low- and moderate- income, and businesses and farms of different sizes. The bank's community development performance demonstrates adequate responsiveness to the community development needs of its assessment areas through community development loans, donations, and community development services considering the bank's capacity and the need and availability of such opportunities for community development in the assessment area.

### **SCOPE OF EXAMINATION**

The scope of the evaluation is consistent with the scope described in the institution summary. Operations within the state of Ohio consist of one non-metropolitan statistical assessment area; the Ohio Non-MSA. This assessment area was selected for full review given it is the only assessment area in Ohio and is the sole basis for the state of Ohio rating. The state of Ohio received less weight in the overall evaluation than the state of Indiana, as a small share of the bank's activities occurred in Ohio.

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE STATE OF OHIO**

The bank operates in one assessment area in the northwest portion of the state of Ohio, described as Ohio Non-MSA, consisting of Van Wert County. The bank operates one full-service branch with a cash-only ATM in Van Wert, Ohio. The bank has not opened or closed any branches in the assessment area since the previous evaluation.

Please refer to the individual assessment area summary for details on demographic and economic conditions.

### **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN STATE OF OHIO**

#### **LENDING TEST**

First Bank of Berne's performance relative to the lending test in Ohio is **satisfactory**. The geographic distribution of loans reflects reasonable dispersion throughout the assessment area. Distribution of lending reflects a reasonable penetration among individuals of different income levels, including low- and moderate-income, and businesses and farms of different sizes.

## Geographic and Borrower Distribution

First Bank of Berne's lending activities reflect reasonable distribution throughout the assessment area within the Ohio. The geographic distribution of HMDA-reportable, small business and small farm loans reflect reasonable dispersion throughout the assessment area in the state of Ohio. In addition, the distribution of lending reflects reasonable penetration among individuals of different income levels including low- and moderate-income, and businesses and farms of different sizes, given the product lines offered by the bank. Please refer to the individual assessment area summary section for details.

## COMMUNITY DEVELOPMENT TEST

### Lending, Investments, and Services Activities

First Bank of Berne's community development activities are **satisfactory**. The bank demonstrates adequate responsiveness to the community development needs of its assessment area through community development qualified investments and community development services, considering the bank's capacity and the need and availability of such opportunities for community development in the assessment area. Please refer to the individual assessment area summary for further details.

## OHIO NON MSA – FULL REVIEW

### SCOPE OF EXAMINATION

Full scope examination procedures were used to evaluate the bank’s performance in the Ohio Non-MSA assessment area. The scope is consistent with the scope of the examination described within the institution summary. For further information, refer to the “Scope of Examination” section for details.

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE OHIO NON-MSA

The bank’s Ohio Non-MSA assessment area is comprised of Van Wert County in its entirety. The assessment area includes nine census tracts, of which eight are middle-income and one is upper income. The bank operates one full-service branch and cash-only ATM in Van Wert, Ohio in an upper-income census tract. The assessment area remains unchanged since the previous evaluation, and there are no distressed or underserved middle-income census tracts.

In 2020, 96 total HMDA reporters within the assessment area originated or purchased 813 HMDA-reportable loans. First Bank of Berne is ranked fifth among HMDA reporting institutions by originating 46 HMDA-reportable loans. By comparison, the first and second ranked financial institutions were Superior Credit Union, Inc., and The Citizens National Bank, with 114 and 93 originations and purchase transactions respectively.

According to the June 30, 2021, FDIC Deposit Market Share Report, First Bank of Berne ranked seventh among eight FDIC-insured financial institutions operating in the assessment area with 7.6 percent of the deposit market share. For comparison, the top two institutions by market share are The Citizens National Bank of Bluffton (21.4) and First Financial Bank (17.9 percent). For reference, the eight total FDIC-insured depository institutions operating in the assessment area maintained a total of nine branch offices, one of which belongs to First Bank of Berne.

The following table displays information about the assessment area by income categories, including details on total families, housing units, businesses, and farms for the year 2021. Please see Appendix B to review this information for the year 2020.

| Assessment Area: 2021 OH Non MSA   |  |   |                          |              |  |              |                             |              |
|--|--|---|--------------------------|--------------|--|--------------|-----------------------------|--------------|
| Income Categories  | Tract Distribution                     |   | Families by Tract Income |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income   |              |
|  | #                                      | %   | #                        | %            | #  | %            | #                           | %            |
| Low-income   | 0                                      | 0.0   | 0                        | 0.0          | 0  | 0.0          | 1,273                       | 16.2         |
| Moderate-income  | 0                                      | 0.0   | 0                        | 0.0          | 0  | 0.0          | 1,413                       | 18.0         |
| Middle-income  | 8                                      | 88.9  | 6,569                    | 83.7         | 624  | 9.5          | 1,869                       | 23.8         |
| Upper-income   | 1                                      | 11.1  | 1,282                    | 16.3         | 91   | 7.1          | 3,296                       | 42.0         |
| Unknown-income   | 0                                      | 0.0   | 0                        | 0.0          | 0  | 0.0          | 0                           | 0.0          |
| <b>Total Assessment Area</b>   | <b>9</b>                               | <b>100.0</b>                                  | <b>7,851</b>             | <b>100.0</b> | <b>715</b>   | <b>9.1</b>   | <b>7,851</b>                | <b>100.0</b> |
|  | <b>Housing Units by Tract</b>          | <b>Housing Types by Tract</b>                 |                          |              |  |              |                             |              |
|  |  | <b>Owner-Occupied</b>                         |                          |              | <b>Rental</b>                                      |              | <b>Vacant</b>               |              |
|  |  | #   | %                        | %            | #  | %            | #                           | %            |
| Low-income   | 0                                      | 0   | 0.0                      | 0.0          | 0  | 0.0          | 0                           | 0.0          |
| Moderate-income  | 0                                      | 0   | 0.0                      | 0.0          | 0  | 0.0          | 0                           | 0.0          |
| Middle-income  | 10,809                                 | 7,063   | 82.2                     | 65.3         | 2,550  | 23.6         | 1,196                       | 11.1         |
| Upper-income   | 1,863                                  | 1,531   | 17.8                     | 82.2         | 211  | 11.3         | 121                         | 6.5          |
| Unknown-income   | 0                                      | 0   | 0.0                      | 0.0          | 0  | 0.0          | 0                           | 0.0          |
| <b>Total Assessment Area</b>   | <b>12,672</b>                          | <b>8,594</b>                                  | <b>100.0</b>             | <b>67.8</b>  | <b>2,761</b>                                       | <b>21.8</b>  | <b>1,317</b>                | <b>10.4</b>  |
|  | <b>Total Businesses by Tract</b>       | <b>Businesses by Tract &amp; Revenue Size</b> |                          |              |  |              |                             |              |
|  |  | <b>Less Than or = \$1 Million</b>             |                          |              | <b>Over \$1 Million</b>                            |              | <b>Revenue Not Reported</b> |              |
|  |  | #   | %                        | #            | %  | #            | %                           | #            |
| Low-income   | 0                                      | 0.0   | 0                        | 0.0          | 0  | 0.0          | 0                           | 0.0          |
| Moderate-income  | 0                                      | 0.0   | 0                        | 0.0          | 0  | 0.0          | 0                           | 0.0          |
| Middle-income  | 845                                    | 86.1  | 746                      | 85.7         | 83   | 90.2         | 16                          | 84.2         |
| Upper-income   | 136                                    | 13.9  | 124                      | 14.3         | 9  | 9.8          | 3                           | 15.8         |
| Unknown-income   | 0                                      | 0.0   | 0                        | 0.0          | 0  | 0.0          | 0                           | 0.0          |
| <b>Total Assessment Area</b>   | <b>981</b>                             | <b>100.0</b>                                  | <b>870</b>               | <b>100.0</b> | <b>92</b>  | <b>100.0</b> | <b>19</b>                   | <b>100.0</b> |
|  | <b>Percentage of Total Businesses:</b> |   |                          | <b>88.7</b>  |  | <b>9.4</b>   |                             | <b>1.9</b>   |
|  | <b>Total Farms by Tract</b>            | <b>Farms by Tract &amp; Revenue Size</b>      |                          |              |  |              |                             |              |
|  |  | <b>Less Than or = \$1 Million</b>             |                          |              | <b>Over \$1 Million</b>                            |              | <b>Revenue Not Reported</b> |              |
|  |  | #   | %                        | #            | %  | #            | %                           | #            |
| Low-income   | 0                                      | 0.0   | 0                        | 0.0          | 0  | 0.0          | 0                           | 0.0          |
| Moderate-income  | 0                                      | 0.0   | 0                        | 0.0          | 0  | 0.0          | 0                           | 0.0          |
| Middle-income  | 124                                    | 75.2  | 123                      | 75.0         | 1  | 100.0        | 0                           | 0.0          |
| Upper-income   | 41                                     | 24.8  | 41                       | 25.0         | 0  | 0.0          | 0                           | 0.0          |
| Unknown-income   | 0                                      | 0.0   | 0                        | 0.0          | 0  | 0.0          | 0                           | 0.0          |
| <b>Total Assessment Area</b>   | <b>165</b>                             | <b>100.0</b>                                  | <b>164</b>               | <b>100.0</b> | <b>1</b>   | <b>100.0</b> | <b>0</b>                    | <b>0.0</b>   |
|  | <b>Percentage of Total Farms:</b>      |   |                          | <b>99.4</b>  |  | <b>0.6</b>   |                             | <b>0.0</b>   |
| 2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS |  |   |                          |              |  |              |                             |              |
| Note: Percentages may not add to 100.0 percent due to rounding                   |  |   |                          |              |  |              |                             |              |

## Population Change

The following table presents the population trends for the assessment area (Van Wert County), Non MSA Ohio and the state of Ohio from 2010-2015. According to the 2011-2015 U.S Census Bureau ACS population estimates, the assessment area has a population of 28,576. Population trends in the assessment area are consistent with the Non MSA and state of Ohio as they have remained relatively stable from 2010 to 2015. According to the community representative, Van Wert County population experienced decline for decades consistent with the trend in other rural communities. The representative indicated that two organized efforts were established to further address the population decline and housing shortage. As a result, population has increased in 2021 as result of new home construction. Also, the buildings in downtown are being revitalized, adding residential space that will attract people to the area.

| Population Change  |                 |                      |                       |
|--|-----------------|----------------------|-----------------------|
| Area   | 2010 Population | 2011-2015 Population | Percentage Change (%) |
| Van Wert County  | 28,744          | 28,576               | -0.6                  |
| Non MSA Ohio   | 2,352,768       | 2,335,892            | -0.7                  |
| State of Ohio  | 11,536,504      | 11,575,977           | 0.3                   |
| <i>Source: 2010 – U.S. Census Bureau: Decennial Census<br/>2011-2015 – U.S. Census Bureau: American Community Survey</i> |                 |                      |                       |

## Income Characteristics

According to 2015 U.S. Census Bureau ACS data, the assessment area is comprised of 7,851 families, of which 16.2 percent are designated as low-income, 18.0 percent are moderate-income, 23.8 percent are middle-income, and 42.0 percent are upper-income. Approximately 9.1 percent of families residing in the assessment area live below the poverty line.

The following table presents the Median Family Income (MFI) for the assessment area. Non MSA Ohio, and the state of Ohio. According to the 2011-2015 U.S. Census Bureau ACS data, the MFI in the assessment area is \$59,310, which is slightly below the state of Ohio MFI of \$62,817. Although the assessment area income is below the state of Ohio, the assessment area experienced the greatest increase at 6.3 percent. A community representative noted that increasing wages are attributed to job growth in the area.

| Median Family Income Change  |                           |                           |                    |
|--|---------------------------|---------------------------|--------------------|
| Area   | 2010 Median Family Income | 2015 Median Family Income | Percent Change (%) |
| Van Wert County  | \$55,771                  | \$59,310                  | 6.3                |
| Non MSA Ohio   | \$56,514                  | \$55,785                  | -1.3               |
| State of Ohio  | \$64,989                  | \$62,817                  | -3.3               |
| <i>Source: 2006-2010 – U.S. Census Bureau: American Community Survey<br/>2011-2015 – U.S. Census Bureau: American Community Survey<br/>Median Family Incomes have been inflation-adjusted and are expressed in 2015 dollars.</i> |                           |                           |                    |

### Housing Characteristics

There are 12,672 housing units within the assessment area, the majority of which are owner-occupied at 67.8 percent. The remaining units are comprised of 21.8 percent rental and 10.4 percent vacant.

Renters and homeowners are considered overburdened when housing cost equal 30.0 percent of more of household income. The following table shows the percentage of renters and owners spending more than 30.0 percent of household income on housing costs. 74.2 percent of low-income renters in Van Wert County experience this burden which is comparable with the state of Ohio at 73.3 percent. On average, the assessment area rental market is more affordable than the rest of the state at 74.2 percent of low-income, 14.5 percent of moderate-income, and 35.0 percent of all renters facing a housing cost burden. Fewer homeowners experience housing cost burden than the rest of the state, with 60.9 percent low-income, 22.7 moderate-income, and 13.5 percent of all owners facing a cost burden. A community representative noted that housing cost is still affordable, although, the county has experienced an increase in home prices.

| 2011-2015 Housing Cost Burden   |                           |                 |             |                          |                 |            |
|---|---------------------------|-----------------|-------------|--------------------------|-----------------|------------|
| Area  | Cost Burden (%) - Renters |                 |             | Cost Burden (%) - Owners |                 |            |
|   | Low Income                | Moderate Income | All Renters | Low Income               | Moderate Income | All Owners |
| Van Wert County   | 74.2                      | 14.5            | 35.0        | 60.9                     | 22.7            | 13.5       |
| Non MSA Ohio  | 69.6                      | 24.9            | 37.8        | 57.1                     | 25.2            | 16.5       |
| State of Ohio   | 73.3                      | 31.3            | 41.2        | 62.7                     | 31.9            | 18.1       |
| <i>Cost Burden is housing cost that equals 30 percent or more of household income.<br/>Source: U.S. Department of Housing and Urban Development (HUD), 2011-2015 Comprehensive Housing Affordability Strategy</i> |                           |                 |             |                          |                 |            |

### Employment Characteristics

The following table presents the unemployment trends for Van Wert County, Non MSA Ohio, and the state of Ohio from 2016 to 2020. The assessment area maintained the lowest unemployment rate during 2020 at 7.0 percent. According to a community representative, Van Wert County

maintains a vast amount of employment opportunities and tends to have a higher labor force participation compared to the state of Ohio. Although the unemployment rate has increased, the representative indicated unemployment is predicted to decline. The representative also noted that the unemployment rate in the assessment area has decreased to 2.6 percent since 2020. The representative also noted that Van Wert County is in close proximity to Fort Wayne, Indiana, and Lima Ohio, which presents a number of career opportunities.

| Recent Unemployment Rates (%) |      |      |      |      |      |
|-------------------------------|------|------|------|------|------|
| Area                          | 2016 | 2017 | 2018 | 2019 | 2020 |
| Van Wert County               | 4.1  | 3.9  | 3.5  | 3.3  | 7.0  |
| Non MSA Ohio                  | 5.4  | 5.1  | 4.7  | 4.4  | 7.8  |
| State of Ohio                 | 5.0  | 5.0  | 4.5  | 4.2  | 8.1  |

*Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics*

### Industry Characteristics

Employers in assessment area represent a number of industries, including manufacturing, healthcare, and retail. A community representative noted that the job market in the area thrives due to the manufacturing industry. The largest manufacturing employers in the area are Danfoss Engineering, Tenneco, and Cooper Foods. Automotive manufacturing accounts for 25.0 percent of jobs in Van Wert County. The representative indicated existing businesses such as Brown Industries, Danfoss Engineering, and Alliance Automation have experienced growth leading to additional expansion among their firms in the area.

### Community Representative

One community representative was contacted to provide relevant economic, demographic, and community credit need information within the assessment area. The representative noted that Van Wert County unemployment is predicted to remain relatively low given its close proximity to Fort Wayne, Indiana and Lima, Ohio. The close proximity allows for residents to commute for job opportunities, and businesses are able to fill job vacancies given the close proximity to these cities. Further, the representative stated Van Wert experienced housing shortages, however, due to local efforts there will be more rental opportunities and an increase in the housing supply. Generally, the community representative considers financial institutions responsive to residential lending. Lastly, the representative noted that local financial institutions are active on boards and actively volunteering and supporting the community.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO NON-MSA

### LENDING TEST

#### Geographic Distribution of Loans

First Bank of Berne demonstrates reasonable geographic distribution of loans given the bank's assessment area. The assessment area is comprised only of middle- or upper-income census tracts, therefore a meaningful analysis could not be performed. The dispersion of the loans in the assessment area was reviewed to determine if the bank is sufficiently serving the census tracts included in the assessment area.

A gap analysis was completed as part of the evaluation. In 2020, First Bank of Berne originated HMDA-loans in 77.8 percent of the census tracts comprising the area. In 2021, small business and small farm loans were originated in 33.3 percent of census tracts, the assessment area does not include any low- or moderate-income census tracts; thus, the analysis is based on the bank's record of lending in middle- and upper-income census tracts. Based upon this analysis, it appears there are no conspicuous geographic lending gaps.

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

First Bank of Berne demonstrates a distribution of loans to individuals of different income levels (including low- and moderate-income individuals) and businesses and farms of different sizes that is reasonable given the demographics of the bank's assessment area.

#### HMDA- Reportable Loans

The borrower distribution of HMDA-reportable loans reflects reasonable penetration among individuals of different income levels. The bank's primary HMDA-reportable loan products originated during the review period in this assessment area were home purchase and refinance loans, which are discussed below. The remaining HMDA-reportable loan products will not be evaluated due to low volumes of originations.

##### *Home Purchase*

In 2020, home loan purchases represented 30.4 percent of the bank's total HMDA-reportable loans originated, with a total of 14 loans. First Bank of Berne originated 14.3 percent of its home purchase loans to low-income borrowers, which was above the aggregate of lenders at 9.3 percent and comparable to the percentage of low-income families within with the assessment area at 16.2 percent. The bank originated 28.6 percent of its home purchase loans to moderate-income borrowers. The bank's performance was below the aggregate at 32.5 percent and above the percent of moderate-income families in the assessment area at 18.0 percent.



### *Refinance*

In 2020, refinance loans represented 67.4 percent of the bank's total HMDA-reportable loans originated, with a total of 31 loans. First Bank of Berne originated 6.5 percent of its refinance loans to low-income borrowers, which was above the aggregate lenders at 3.7 percent, but below the percentage of low-income families located in the assessment area at 16.2 percent. The bank originated 32.3 percent of its refinance loans to moderate-income borrowers, which was significantly above the percentage made by aggregate lenders at 16.2 percent and the percentage of moderate-income families within the assessment area at 18.0 percent.

The following table presents the 2020 borrower distribution of HMDA-reportable loans originated in the assessment area. The 2019 borrower distribution table of HMDA-reportable loans can be found in Appendix B. Overall, the borrower distribution of HMDA-reportable lending in 2019 was generally consistent with the bank's performance in 2020.

| <b>Borrower Distribution of HMDA Reportable Loans</b>                 |                        |                                     |           |              |              |              |              |                             |
|---|------------------------|-------------------------------------|-----------|--------------|--------------|--------------|--------------|-----------------------------|
| <b>Assessment Area: 2020 OH Non MSA</b>                               |                        |                                     |           |              |              |              |              |                             |
| Product Type  | Borrower Income Levels | Bank & Aggregate Lending Comparison |           |              |              |              |              | Families by Family Income % |
|   |                        | 2020                                |           |              |              |              |              |                             |
|   |                        | Count Bank                          |           | Agg          | Dollar Bank  |              | Agg          |                             |
|   |                        | #                                   | %         | %            | \$(000s)     | \$ %         | \$ %         |                             |
| Home Purchase   | Low                    | 2                                   | 14.3      | 9.3          | 202          | 11.4         | 6.1          | 16.2                        |
|   | Moderate               | 4                                   | 28.6      | 32.5         | 395          | 22.2         | 25.3         | 18.0                        |
|   | Middle                 | 4                                   | 28.6      | 30.3         | 519          | 29.2         | 33.3         | 23.8                        |
|   | Upper                  | 4                                   | 28.6      | 20.1         | 663          | 37.3         | 29.1         | 42.0                        |
|   | Unknown                | 0                                   | 0.0       | 7.7          | 0            | 0.0          | 6.1          | 0.0                         |
|   | <b>Total</b>           |                                     | <b>14</b> | <b>100.0</b> | <b>100.0</b> | <b>1,779</b> | <b>100.0</b> | <b>100.0</b>                |
| Refinance   | Low                    | 2                                   | 6.5       | 3.7          | 148          | 4.0          | 2.3          | 16.2                        |
|   | Moderate               | 10                                  | 32.3      | 16.2         | 826          | 22.5         | 11.0         | 18.0                        |
|   | Middle                 | 7                                   | 22.6      | 26.4         | 811          | 22.1         | 23.7         | 23.8                        |
|   | Upper                  | 10                                  | 32.3      | 37.9         | 1,366        | 37.2         | 45.9         | 42.0                        |
|   | Unknown                | 2                                   | 6.5       | 15.9         | 519          | 14.1         | 17.2         | 0.0                         |
|   | <b>Total</b>           |                                     | <b>31</b> | <b>100.0</b> | <b>100.0</b> | <b>3,670</b> | <b>100.0</b> | <b>100.0</b>                |
| Home Improvement  | Low                    | 0                                   | 0.0       | 4.0          | 0            | 0.0          | 2.2          | 16.2                        |
|   | Moderate               | 0                                   | 0.0       | 14.0         | 0            | 0.0          | 13.1         | 18.0                        |
|   | Middle                 | 0                                   | 0.0       | 48.0         | 0            | 0.0          | 50.0         | 23.8                        |
|   | Upper                  | 1                                   | 100.0     | 34.0         | 178          | 100.0        | 34.7         | 42.0                        |
|   | Unknown                | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 0.0                         |
|   | <b>Total</b>           |                                     | <b>1</b>  | <b>100.0</b> | <b>100.0</b> | <b>178</b>   | <b>100.0</b> | <b>100.0</b>                |
| Multi-Family  | Low                    | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 16.2                        |
|   | Moderate               | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 18.0                        |
|   | Middle                 | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 23.8                        |
|   | Upper                  | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 42.0                        |
|   | Unknown                | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 0.0                         |
|   | <b>Total</b>           |                                     | <b>0</b>  | <b>0.0</b>   | <b>0.0</b>   | <b>0</b>     | <b>0.0</b>   | <b>0.0</b>                  |
| Other Purpose LOC   | Low                    | 0                                   | 0.0       | 6.1          | 0            | 0.0          | 7.0          | 16.2                        |
|   | Moderate               | 0                                   | 0.0       | 9.1          | 0            | 0.0          | 4.6          | 18.0                        |
|   | Middle                 | 0                                   | 0.0       | 39.4         | 0            | 0.0          | 39.0         | 23.8                        |
|   | Upper                  | 0                                   | 0.0       | 45.5         | 0            | 0.0          | 49.4         | 42.0                        |
|   | Unknown                | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 0.0                         |
|   | <b>Total</b>           |                                     | <b>0</b>  | <b>0.0</b>   | <b>100.0</b> | <b>0</b>     | <b>0.0</b>   | <b>100.0</b>                |
| Other Purpose Closed/Exempt   | Low                    | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 16.2                        |
|   | Moderate               | 0                                   | 0.0       | 20.0         | 0            | 0.0          | 4.9          | 18.0                        |
|   | Middle                 | 0                                   | 0.0       | 20.0         | 0            | 0.0          | 36.7         | 23.8                        |
|   | Upper                  | 0                                   | 0.0       | 40.0         | 0            | 0.0          | 52.6         | 42.0                        |
|   | Unknown                | 0                                   | 0.0       | 20.0         | 0            | 0.0          | 5.8          | 0.0                         |
|   | <b>Total</b>           |                                     | <b>0</b>  | <b>0.0</b>   | <b>100.0</b> | <b>0</b>     | <b>0.0</b>   | <b>100.0</b>                |
| Loan Purpose Not Applicable   | Low                    | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 16.2                        |
|   | Moderate               | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 18.0                        |
|   | Middle                 | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 23.8                        |
|   | Upper                  | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 42.0                        |
|   | Unknown                | 0                                   | 0.0       | 100.0        | 0            | 0.0          | 100.0        | 0.0                         |
|   | <b>Total</b>           |                                     | <b>0</b>  | <b>0.0</b>   | <b>100.0</b> | <b>0</b>     | <b>0.0</b>   | <b>100.0</b>                |
| HMDA Totals   | Low                    | 4                                   | 8.7       | 5.9          | 350          | 6.2          | 4.0          | 16.2                        |
|   | Moderate               | 14                                  | 30.4      | 21.9         | 1,221        | 21.7         | 17.0         | 18.0                        |
|   | Middle                 | 11                                  | 23.9      | 29.2         | 1,330        | 23.6         | 28.6         | 23.8                        |
|   | Upper                  | 15                                  | 32.6      | 30.0         | 2,207        | 39.2         | 37.7         | 42.0                        |
|   | Unknown                | 2                                   | 4.3       | 13.0         | 519          | 9.2          | 12.7         | 0.0                         |
|   | <b>Total</b>           |                                     | <b>46</b> | <b>100.0</b> | <b>100.0</b> | <b>5,627</b> | <b>100.0</b> | <b>100.0</b>                |
| Originations & Purchases  |                        |                                     |           |              |              |              |              |                             |
| 2016 FFIEC Census Data  |                        |                                     |           |              |              |              |              |                             |
| <i>Note: Percentages may not add to 100.0 percent due to rounding</i> |                        |                                     |           |              |              |              |              |                             |

### Small Business Loans

The distribution of small businesses loans reflects reasonable penetration among businesses of different revenue sizes. The 2020 sample included four small business loans, of which 100 percent by number were to businesses with gross revenues equal to or less than \$1 million. This is above the gross revenue composition of small businesses in the assessment area, at 88.7 percent. Of these loans 75.0 had a loan amount of \$100,000 or less, which is reflective of loans most responsive to the smallest businesses. The following table presents the bank’s borrower distribution of small business loans in 2021.

| <b>Small Business Lending By Revenue &amp; Loan Size</b> |                         |                               |              |                          |                |                          |                     |
|--|-------------------------|-------------------------------|--------------|--------------------------|----------------|--------------------------|---------------------|
| <b>Assessment Area: 2021 OH Non MSA</b>                  |                         |                               |              |                          |                |                          |                     |
| Product Type   |                         | Bank & Demographic Comparison |              |                          |                |                          |                     |
|  |                         | 2021                          |              | 2021                     |                | Total<br>Businesses<br>% |                     |
| #  | %                       | Dollar<br>Bank<br>\$ 000s     | %            | Total<br>Businesses<br>% |                |                          |                     |
|  |                         |                               |              |                          | Small Business | Revenue                  | \$1 Million or Less |
| Over \$1 Million   | 0                       | 0.0                           | 0            | 0.0                      |                |                          | 9.4                 |
| Unknown  | 0                       | 0.0                           | 0            | 0.0                      |                |                          | 1.9                 |
| <b>Total</b>   | <b>4</b>                | <b>100.0</b>                  | <b>1,079</b> | <b>100.0</b>             |                |                          | <b>100.0</b>        |
| Loan Size  | \$100,000 or Less       | 3                             | 75.0         | 79                       |                | 7.3                      |                     |
|  | \$100,001 - \$250,000   | 0                             | 0.0          | 0                        |                | 0.0                      |                     |
|  | \$250,001 - \$1 Million | 1                             | 25.0         | 1,000                    |                | 92.7                     |                     |
|  | <b>Total</b>            | <b>4</b>                      | <b>100.0</b> | <b>1,079</b>             |                | <b>100.0</b>             |                     |
| Loan Size & Rev \$1 Mill or Less                         | \$100,000 or Less       | 3                             | 75.0         | 79                       |                | 7.3                      |                     |
|  | \$100,001 - \$250,000   | 0                             | 0.0          | 0                        |                | 0.0                      |                     |
|  | \$250,001 - \$1 Million | 1                             | 25.0         | 1,000                    |                | 92.7                     |                     |
|  | <b>Total</b>            | <b>4</b>                      | <b>100.0</b> | <b>1,079</b>             |                | <b>100.0</b>             |                     |

Originations & Purchases  
2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

### Small Farm Loans

The distribution of small farm loans reflects reasonable penetration among farms of different revenue sizes. The 2021 sample included five small farm loans, of which all loans were to farms with gross revenues equal to or less than \$1 million. This is comparable with the percent of small farms in the assessment area at 99.4 percent. Of the five small farm loans originated, 20.0 percent of those were in amounts of \$100,000 or less, which is considered the most beneficial to small farms and demonstrates the bank’s willingness to meet the credit needs of small farms. The following table presents the bank’s borrower distribution of small farm loans in 2021.

| Small Farm Lending By Revenue & Loan Size |                                  |                               |   |         |      |             |       |
|---|----------------------------------|-------------------------------|---|---------|------|-------------|-------|
| Assessment Area: 2021 OH Non MSA          |                                  |                               |   |         |      |             |       |
| Product Type                              |                                  | Bank & Demographic Comparison |   |         |      |             |       |
|   |                                  | 2021                          |   | 2021    |      | Total Farms |       |
|   |                                  | Count                         |   | Dollar  |      |             |       |
|   |                                  | Bank                          |   | Bank    |      |             |       |
|   |                                  | #                             | % | \$ 000s | \$ % | %           |       |
| Small Farm                                | Revenue                          | \$1 Million or Less           | 5 | 100.0   | 743  | 100.0       | 99.4  |
|   |                                  | Over \$1 Million              | 0 | 0.0     | 0    | 0.0         | 0.6   |
|   |                                  | Unknown                       | 0 | 0.0     | 0    | 0.0         | 0.0   |
|   |                                  | Total                         | 5 | 100.0   | 743  | 100.0       | 100.0 |
|   | Loan Size                        | \$100,000 or Less             | 1 | 20.0    | 100  | 13.5        |       |
|   |                                  | \$100,001 - \$250,000         | 4 | 80.0    | 643  | 86.5        |       |
|   |                                  | \$250,001 - \$500,000         | 0 | 0.0     | 0    | 0.0         |       |
|   |                                  | Total                         | 5 | 100.0   | 743  | 100.0       |       |
|   | Loan Size & Rev \$1 Mill or Less | \$100,000 or Less             | 1 | 20.0    | 100  | 13.5        |       |
|   |                                  | \$100,001 - \$250,000         | 4 | 80.0    | 643  | 86.5        |       |
|   |                                  | \$250,001 - \$500,000         | 0 | 0.0     | 0    | 0.0         |       |
|   |                                  | Total                         | 5 | 100.0   | 743  | 100.0       |       |

Originations & Purchases  
2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

## COMMUNITY DEVELOPMENT TEST

### Lending, Investment, and Services Activities

The bank demonstrates adequate responsiveness to the community development needs of its assessment area through qualified investments, and community development services as appropriate, considering the bank’s capacity and the need and the availability of such opportunities for community development in the bank’s assessment area. The bank’s lending activities were limited during this review period; however, the investment and service activities were sufficiently responsive to support a satisfactory rating.

### Lending

First Bank of Berne did not make any qualified loans during the evaluation period, which is less than the previous evaluation where the bank originated one community development loan for \$400,000.

## Investments

The bank originated one new investment totaling \$340,000, of which all is currently funded. The investment was made to an organization that supports community development efforts, specifically education, in the assessment area. This represents an increase, as no investments were originated in this assessment area at the previous examination. First Bank of Berne donated to 14 different organizations totaling \$4,930. These donations primarily benefitted organizations that provide community services to support low- and moderate-income individuals and families. This is less than the previous evaluation where the bank made qualified donations to eight unique organizations totaling \$17,300.

## Services

Bank staff provided a total of 522 hours of community development services to 10 unique organizations located in the assessment area, an increase in the total number of community services activities in comparison to the previous evaluation where the bank provided 114 service hours to four organizations. Benefitting from these services were organizations that received assistance with promoting economic and community development, affordable housing, and providing financial assistance to low- and moderate-income families.

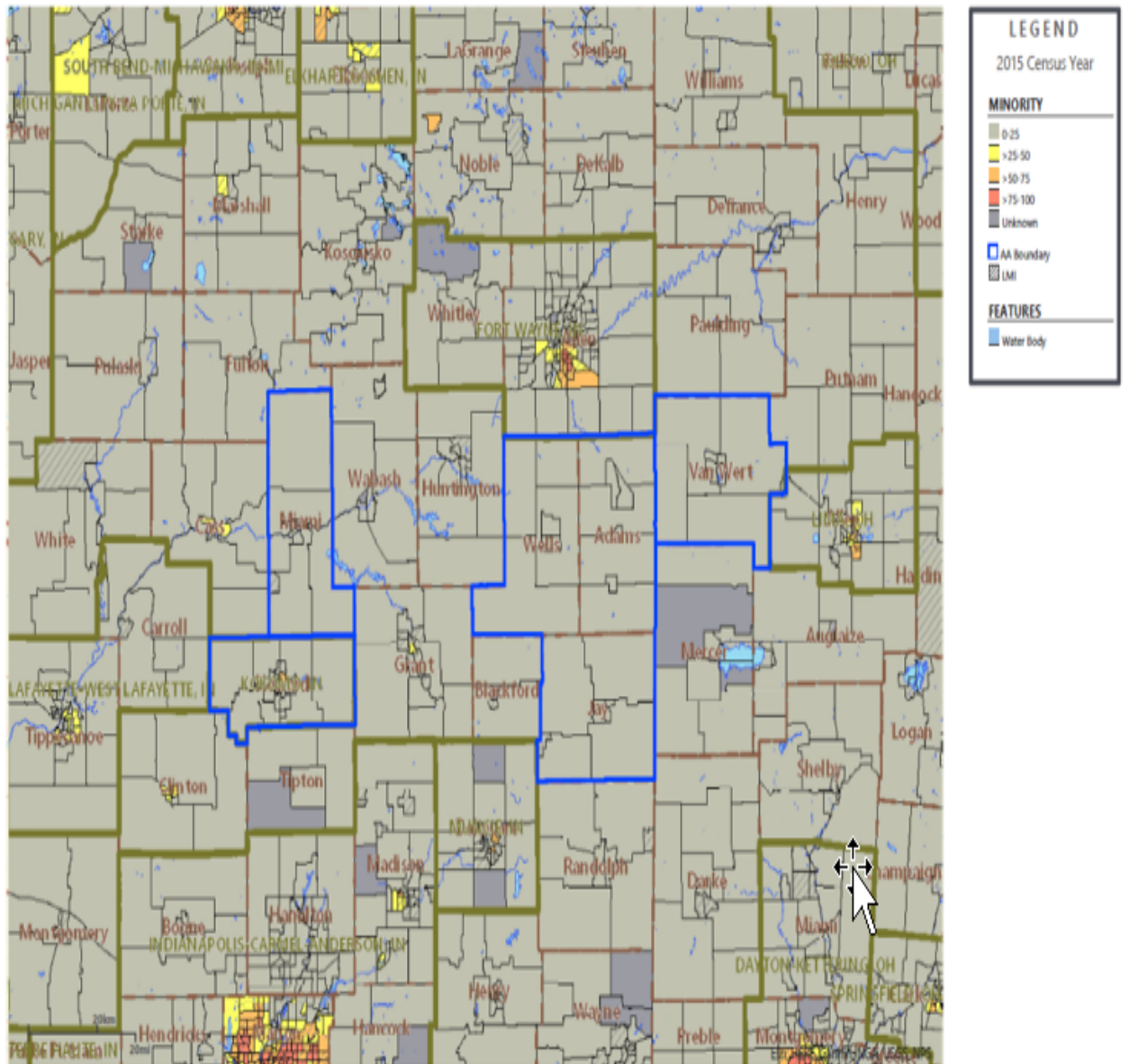
| Summary of CD Activities<br>January 8, 2019 – January 31, 2022 |                    |          |                      |          |                                      |          |                    |          |        |          |
|--|--------------------|----------|----------------------|----------|--------------------------------------|----------|--------------------|----------|--------|----------|
| Type of Activity   | Affordable Housing |          | Economic Development |          | Activities that Revitalize/Stabilize |          | Community Services |          | Totals |          |
|  | #                  | \$/Hours | #                    | \$/Hours | #                                    | \$/Hours | #                  | \$/Hours | #      | \$/Hours |
| Lending  | 0                  | 0        | 0                    | 0        | 0                                    | 0        | 0                  | 0        | 0      | 0        |
| Investment   | 0                  | 0        | 0                    | 0        | 0                                    | 0        | 1                  | 340,000  | 1      | 340,000  |
| Donations  | 0                  | 0        | 0                    | 0        | 0                                    | 0        | 14                 | 4,930    | 14     | 4,930    |
| Services   | 0                  | 0        | 5                    | 174      | 0                                    | 0        | 5                  | 348      | 10     | 522      |

### APPENDIX A – Map of the Assessment Areas

#### First Bank of Berne 312244

Combined Assessment Area

Restricted FR



**APPENDIX B – 2020 Assessment Area Demographics and 2019 HMDA Lending Tables**

| Assessment Area: 2020 Eastern IN Non MSA |                                 |                                    |                          |                  |  |                      |                           |              |
|--|---------------------------------|------------------------------------|--------------------------|------------------|--|----------------------|---------------------------|--------------|
| Income Categories                        | Tract Distribution              |                                    | Families by Tract Income |                  | Families < Poverty Level as % of Families by Tract |                      | Families by Family Income |              |
|  | #                               | %                                  | #                        | %                | #  | %                    | #                         | %            |
| Low-income                               | 0                               | 0.0                                | 0                        | 0.0              | 0  | 0.0                  | 3,631                     | 16.7         |
| Moderate-income                          | 2                               | 9.5                                | 1,581                    | 7.3              | 314  | 19.9                 | 3,685                     | 17.0         |
| Middle-income                            | 17                              | 81.0                               | 17,869                   | 82.3             | 1,782  | 10.0                 | 5,514                     | 25.4         |
| Upper-income                             | 2                               | 9.5                                | 2,257                    | 10.4             | 96   | 4.3                  | 8,877                     | 40.9         |
| Unknown-income                           | 0                               | 0.0                                | 0                        | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| <b>Total Assessment Area</b>             | <b>21</b>                       | <b>100.0</b>                       | <b>21,707</b>            | <b>100.0</b>     | <b>2,192</b>                                       | <b>10.1</b>          | <b>21,707</b>             | <b>100.0</b> |
|  | Housing Units by Tract          | Housing Types by Tract             |                          |                  |  |                      |                           |              |
|  |                                 | Owner-Occupied                     |                          | Rental           |  | Vacant               |                           |              |
|  |                                 | #                                  | %                        | %                | #  | %                    | #                         | %            |
| Low-income                               | 0                               | 0                                  | 0.0                      | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| Moderate-income                          | 2,995                           | 1,596                              | 6.5                      | 53.3             | 905  | 30.2                 | 494                       | 16.5         |
| Middle-income                            | 27,934                          | 20,135                             | 82.5                     | 72.1             | 5,536  | 19.8                 | 2,263                     | 8.1          |
| Upper-income                             | 3,036                           | 2,683                              | 11.0                     | 88.4             | 276  | 9.1                  | 77                        | 2.5          |
| Unknown-income                           | 0                               | 0                                  | 0.0                      | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| <b>Total Assessment Area</b>             | <b>33,965</b>                   | <b>24,414</b>                      | <b>100.0</b>             | <b>71.9</b>      | <b>6,717</b>                                       | <b>19.8</b>          | <b>2,834</b>              | <b>8.3</b>   |
|  | Total Businesses by Tract       | Businesses by Tract & Revenue Size |                          |                  |  |                      |                           |              |
|  |                                 | Less Than or = \$1 Million         |                          | Over \$1 Million |  | Revenue Not Reported |                           |              |
|  |                                 | #                                  | %                        | #                | %  | #                    | %                         |              |
| Low-income                               | 0                               | 0                                  | 0.0                      | 0                | 0.0  | 0                    | 0.0                       |              |
| Moderate-income                          | 259                             | 8.4                                | 226                      | 8.1              | 25   | 10.1                 | 8                         | 16.7         |
| Middle-income                            | 2,539                           | 82.2                               | 2,310                    | 82.7             | 195  | 78.9                 | 34                        | 70.8         |
| Upper-income                             | 291                             | 9.4                                | 258                      | 9.2              | 27   | 10.9                 | 6                         | 12.5         |
| Unknown-income                           | 0                               | 0.0                                | 0                        | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| <b>Total Assessment Area</b>             | <b>3,089</b>                    | <b>100.0</b>                       | <b>2,794</b>             | <b>100.0</b>     | <b>247</b>   | <b>100.0</b>         | <b>48</b>                 | <b>100.0</b> |
|  | Percentage of Total Businesses: |                                    |                          | 90.4             |  | 8.0                  |                           | 1.6          |
|  | Total Farms by Tract            | Farms by Tract & Revenue Size      |                          |                  |  |                      |                           |              |
|  |                                 | Less Than or = \$1 Million         |                          | Over \$1 Million |  | Revenue Not Reported |                           |              |
|  |                                 | #                                  | %                        | #                | %  | #                    | %                         |              |
| Low-income                               | 0                               | 0                                  | 0.0                      | 0                | 0.0  | 0                    | 0.0                       |              |
| Moderate-income                          | 1                               | 0.2                                | 1                        | 0.2              | 0  | 0.0                  | 0                         | 0.0          |
| Middle-income                            | 438                             | 87.6                               | 433                      | 87.8             | 4  | 66.7                 | 1                         | 100.0        |
| Upper-income                             | 61                              | 12.2                               | 59                       | 12.0             | 2  | 33.3                 | 0                         | 0.0          |
| Unknown-income                           | 0                               | 0.0                                | 0                        | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| <b>Total Assessment Area</b>             | <b>500</b>                      | <b>100.0</b>                       | <b>493</b>               | <b>100.0</b>     | <b>6</b>   | <b>100.0</b>         | <b>1</b>                  | <b>100.0</b> |
|  | Percentage of Total Farms:      |                                    |                          | 98.6             |  | 1.2                  |                           | 0.2          |

2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS

Note: Percentages may not add to 100.0 percent due to rounding

| Assessment Area: 2020 Kokomo, IN MSA 29020                                       |                                 |                                    |                          |              |  |              |                           |              |
|--|---------------------------------|------------------------------------|--------------------------|--------------|--|--------------|---------------------------|--------------|
| Income Categories  | Tract Distribution              |                                    | Families by Tract Income |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|  | #                               | %                                  | #                        | %            | #  | %            | #                         | %            |
| Low-income   | 2                               | 10.0                               | 1,791                    | 8.0          | 602  | 33.6         | 4,955                     | 22.2         |
| Moderate-income  | 4                               | 20.0                               | 3,434                    | 15.4         | 849  | 24.7         | 3,704                     | 16.6         |
| Middle-income  | 9                               | 45.0                               | 10,461                   | 47.0         | 1,276  | 12.2         | 4,704                     | 21.1         |
| Upper-income   | 5                               | 25.0                               | 6,595                    | 29.6         | 231  | 3.5          | 8,918                     | 40.0         |
| Unknown-income   | 0                               | 0.0                                | 0                        | 0.0          | 0  | 0.0          | 0                         | 0.0          |
| <b>Total Assessment Area</b>   | <b>20</b>                       | <b>100.0</b>                       | <b>22,281</b>            | <b>100.0</b> | <b>2,958</b>                                       | <b>13.3</b>  | <b>22,281</b>             | <b>100.0</b> |
|  | Housing Units by Tract          | Housing Types by Tract             |                          |              |  |              |                           |              |
|  |                                 | Owner-Occupied                     |                          |              | Rental   |              | Vacant                    |              |
|  |                                 | #                                  | %                        | %            | #  | %            | #                         | %            |
| Low-income   | 3,862                           | 1,497                              | 6.3                      | 38.8         | 1,748  | 45.3         | 617                       | 16.0         |
| Moderate-income  | 7,327                           | 3,372                              | 14.2                     | 46.0         | 2,460  | 33.6         | 1,495                     | 20.4         |
| Middle-income  | 17,841                          | 11,558                             | 48.7                     | 64.8         | 4,830  | 27.1         | 1,453                     | 8.1          |
| Upper-income   | 9,619                           | 7,304                              | 30.8                     | 75.9         | 1,644  | 17.1         | 671                       | 7.0          |
| Unknown-income   | 0                               | 0                                  | 0.0                      | 0.0          | 0  | 0.0          | 0                         | 0.0          |
| <b>Total Assessment Area</b>   | <b>38,649</b>                   | <b>23,731</b>                      | <b>100.0</b>             | <b>61.4</b>  | <b>10,682</b>                                      | <b>27.6</b>  | <b>4,236</b>              | <b>11.0</b>  |
|  | Total Businesses by Tract       | Businesses by Tract & Revenue Size |                          |              |  |              |                           |              |
|  |                                 | Less Than or = \$1 Million         |                          |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|  |                                 | #                                  | %                        | #            | %  | #            | %                         | %            |
| Low-income   | 319                             | 11.0                               | 293                      | 11.0         | 25   | 12.9         | 1                         | 3.0          |
| Moderate-income  | 545                             | 18.9                               | 498                      | 18.7         | 39   | 20.1         | 8                         | 24.2         |
| Middle-income  | 1,327                           | 45.9                               | 1,216                    | 45.7         | 93   | 47.9         | 18                        | 54.5         |
| Upper-income   | 697                             | 24.1                               | 654                      | 24.6         | 37   | 19.1         | 6                         | 18.2         |
| Unknown-income   | 0                               | 0.0                                | 0                        | 0.0          | 0  | 0.0          | 0                         | 0.0          |
| <b>Total Assessment Area</b>   | <b>2,888</b>                    | <b>100.0</b>                       | <b>2,661</b>             | <b>100.0</b> | <b>194</b>   | <b>100.0</b> | <b>33</b>                 | <b>100.0</b> |
|  | Percentage of Total Businesses: |                                    |                          | 92.1         |  | 6.7          |                           | 1.1          |
|  | Total Farms by Tract            | Farms by Tract & Revenue Size      |                          |              |  |              |                           |              |
|  |                                 | Less Than or = \$1 Million         |                          |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|  |                                 | #                                  | %                        | #            | %  | #            | %                         | %            |
| Low-income   | 2                               | 1.5                                | 2                        | 1.6          | 0  | 0.0          | 0                         | 0.0          |
| Moderate-income  | 2                               | 1.5                                | 2                        | 1.6          | 0  | 0.0          | 0                         | 0.0          |
| Middle-income  | 67                              | 51.5                               | 67                       | 51.9         | 0  | 0.0          | 0                         | 0.0          |
| Upper-income   | 59                              | 45.4                               | 58                       | 45.0         | 1  | 100.0        | 0                         | 0.0          |
| Unknown-income   | 0                               | 0.0                                | 0                        | 0.0          | 0  | 0.0          | 0                         | 0.0          |
| <b>Total Assessment Area</b>   | <b>130</b>                      | <b>100.0</b>                       | <b>129</b>               | <b>100.0</b> | <b>1</b>   | <b>100.0</b> | <b>0</b>                  | <b>0.0</b>   |
|  | Percentage of Total Farms:      |                                    |                          | 99.2         |  | 0.8          |                           | 0.0          |
| 2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS |                                 |                                    |                          |              |  |              |                           |              |
| Note: Percentages may not add to 100.0 percent due to rounding                   |                                 |                                    |                          |              |  |              |                           |              |



| Assessment Area: 2020 Western IN Non MSA |                                 |                                    |                          |                  |  |                      |                           |              |
|--|---------------------------------|------------------------------------|--------------------------|------------------|--|----------------------|---------------------------|--------------|
| Income Categories                        | Tract Distribution              |                                    | Families by Tract Income |                  | Families < Poverty Level as % of Families by Tract |                      | Families by Family Income |              |
|  | #                               | %                                  | #                        | %                | #  | %                    | #                         | %            |
| Low-income                               | 0                               | 0.0                                | 0                        | 0.0              | 0  | 0.0                  | 1,923                     | 21.1         |
| Moderate-income                          | 2                               | 20.0                               | 1,145                    | 12.6             | 208  | 18.2                 | 1,571                     | 17.3         |
| Middle-income                            | 8                               | 80.0                               | 7,958                    | 87.4             | 733  | 9.2                  | 1,969                     | 21.6         |
| Upper-income                             | 0                               | 0.0                                | 0                        | 0.0              | 0  | 0.0                  | 3,640                     | 40.0         |
| Unknown-income                           | 0                               | 0.0                                | 0                        | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| <b>Total Assessment Area</b>             | <b>10</b>                       | <b>100.0</b>                       | <b>9,103</b>             | <b>100.0</b>     | <b>941</b>   | <b>10.3</b>          | <b>9,103</b>              | <b>100.0</b> |
|  | Housing Units by Tract          | Housing Types by Tract             |                          |                  |  |                      |                           |              |
|  |                                 | Owner-Occupied                     |                          |                  | Rental   |                      | Vacant                    |              |
|  |                                 | #                                  | %                        | %                | #  | %                    | #                         | %            |
| Low-income                               | 0                               | 0                                  | 0.0                      | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| Moderate-income                          | 2,274                           | 1,030                              | 10.7                     | 45.3             | 798  | 35.1                 | 446                       | 19.6         |
| Middle-income                            | 13,089                          | 8,576                              | 89.3                     | 65.5             | 2,760  | 21.1                 | 1,753                     | 13.4         |
| Upper-income                             | 0                               | 0                                  | 0.0                      | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| Unknown-income                           | 0                               | 0                                  | 0.0                      | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| <b>Total Assessment Area</b>             | <b>15,363</b>                   | <b>9,606</b>                       | <b>100.0</b>             | <b>62.5</b>      | <b>3,558</b>                                       | <b>23.2</b>          | <b>2,199</b>              | <b>14.3</b>  |
|  | Total Businesses by Tract       | Businesses by Tract & Revenue Size |                          |                  |  |                      |                           |              |
|  |                                 | Less Than or = \$1 Million         |                          | Over \$1 Million |  | Revenue Not Reported |                           |              |
|  |                                 | #                                  | %                        | #                | %  | #                    | %                         |              |
| Low-income                               | 0                               | 0                                  | 0.0                      | 0                | 0.0  | 0                    | 0.0                       |              |
| Moderate-income                          | 138                             | 123                                | 12.9                     | 12.5             | 14   | 19.4                 | 1                         | 5.9          |
| Middle-income                            | 933                             | 859                                | 87.1                     | 87.5             | 58   | 80.6                 | 16                        | 94.1         |
| Upper-income                             | 0                               | 0                                  | 0.0                      | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| Unknown-income                           | 0                               | 0                                  | 0.0                      | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| <b>Total Assessment Area</b>             | <b>1,071</b>                    | <b>982</b>                         | <b>100.0</b>             | <b>100.0</b>     | <b>72</b>  | <b>100.0</b>         | <b>17</b>                 | <b>100.0</b> |
|  | Percentage of Total Businesses: |                                    |                          | 91.7             |  | 6.7                  |                           | 1.6          |
|  | Total Farms by Tract            | Farms by Tract & Revenue Size      |                          |                  |  |                      |                           |              |
|  |                                 | Less Than or = \$1 Million         |                          | Over \$1 Million |  | Revenue Not Reported |                           |              |
|  |                                 | #                                  | %                        | #                | %  | #                    | %                         |              |
| Low-income                               | 0                               | 0                                  | 0.0                      | 0                | 0.0  | 0                    | 0.0                       |              |
| Moderate-income                          | 1                               | 1                                  | 0.7                      | 0.7              | 0  | 0.0                  | 0                         | 0.0          |
| Middle-income                            | 136                             | 133                                | 99.3                     | 99.3             | 2  | 100.0                | 1                         | 100.0        |
| Upper-income                             | 0                               | 0                                  | 0.0                      | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| Unknown-income                           | 0                               | 0                                  | 0.0                      | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| <b>Total Assessment Area</b>             | <b>137</b>                      | <b>134</b>                         | <b>100.0</b>             | <b>100.0</b>     | <b>2</b>   | <b>100.0</b>         | <b>1</b>                  | <b>100.0</b> |
|  | Percentage of Total Farms:      |                                    |                          | 97.8             |  | 1.5                  |                           | 0.7          |

2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS

Note: Percentages may not add to 100.0 percent due to rounding

| Assessment Area: 2020 OH Non MSA   |                                 |                                    |                          |                  |  |                      |                           |              |
|--|---------------------------------|------------------------------------|--------------------------|------------------|--|----------------------|---------------------------|--------------|
| Income Categories  | Tract Distribution              |                                    | Families by Tract Income |                  | Families < Poverty Level as % of Families by Tract |                      | Families by Family Income |              |
|  | #                               | %                                  | #                        | %                | #  | %                    | #                         | %            |
| Low-income   | 0                               | 0.0                                | 0                        | 0.0              | 0  | 0.0                  | 1,273                     | 16.2         |
| Moderate-income  | 0                               | 0.0                                | 0                        | 0.0              | 0  | 0.0                  | 1,413                     | 18.0         |
| Middle-income  | 8                               | 88.9                               | 6,569                    | 83.7             | 624  | 9.5                  | 1,869                     | 23.8         |
| Upper-income   | 1                               | 11.1                               | 1,282                    | 16.3             | 91   | 7.1                  | 3,296                     | 42.0         |
| Unknown-income   | 0                               | 0.0                                | 0                        | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| <b>Total Assessment Area</b>   | <b>9</b>                        | <b>100.0</b>                       | <b>7,851</b>             | <b>100.0</b>     | <b>715</b>   | <b>9.1</b>           | <b>7,851</b>              | <b>100.0</b> |
|  | Housing Units by Tract          | Housing Types by Tract             |                          |                  |  |                      |                           |              |
|  |                                 | Owner-Occupied                     |                          |                  | Rental   |                      | Vacant                    |              |
|  |                                 | #                                  | %                        | %                | #  | %                    | #                         | %            |
| Low-income   | 0                               | 0                                  | 0.0                      | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| Moderate-income  | 0                               | 0                                  | 0.0                      | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| Middle-income  | 10,809                          | 7,063                              | 82.2                     | 65.3             | 2,550  | 23.6                 | 1,196                     | 11.1         |
| Upper-income   | 1,863                           | 1,531                              | 17.8                     | 82.2             | 211  | 11.3                 | 121                       | 6.5          |
| Unknown-income   | 0                               | 0                                  | 0.0                      | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| <b>Total Assessment Area</b>   | <b>12,672</b>                   | <b>8,594</b>                       | <b>100.0</b>             | <b>67.8</b>      | <b>2,761</b>                                       | <b>21.8</b>          | <b>1,317</b>              | <b>10.4</b>  |
|  | Total Businesses by Tract       | Businesses by Tract & Revenue Size |                          |                  |  |                      |                           |              |
|  |                                 | Less Than or = \$1 Million         |                          | Over \$1 Million |  | Revenue Not Reported |                           |              |
|  |                                 | #                                  | %                        | #                | %  | #                    | %                         | #            |
| Low-income   | 0                               | 0.0                                | 0                        | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| Moderate-income  | 0                               | 0.0                                | 0                        | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| Middle-income  | 857                             | 85.9                               | 758                      | 85.5             | 86   | 90.5                 | 13                        | 81.3         |
| Upper-income   | 141                             | 14.1                               | 129                      | 14.5             | 9  | 9.5                  | 3                         | 18.8         |
| Unknown-income   | 0                               | 0.0                                | 0                        | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| <b>Total Assessment Area</b>   | <b>998</b>                      | <b>100.0</b>                       | <b>887</b>               | <b>100.0</b>     | <b>95</b>  | <b>100.0</b>         | <b>16</b>                 | <b>100.0</b> |
|  | Percentage of Total Businesses: |                                    |                          | 88.9             |  | 9.5                  |                           | 1.6          |
|  | Total Farms by Tract            | Farms by Tract & Revenue Size      |                          |                  |  |                      |                           |              |
|  |                                 | Less Than or = \$1 Million         |                          | Over \$1 Million |  | Revenue Not Reported |                           |              |
|  |                                 | #                                  | %                        | #                | %  | #                    | %                         | #            |
| Low-income   | 0                               | 0.0                                | 0                        | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| Moderate-income  | 0                               | 0.0                                | 0                        | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| Middle-income  | 139                             | 76.8                               | 138                      | 76.7             | 1  | 100.0                | 0                         | 0.0          |
| Upper-income   | 42                              | 23.2                               | 42                       | 23.3             | 0  | 0.0                  | 0                         | 0.0          |
| Unknown-income   | 0                               | 0.0                                | 0                        | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| <b>Total Assessment Area</b>   | <b>181</b>                      | <b>100.0</b>                       | <b>180</b>               | <b>100.0</b>     | <b>1</b>   | <b>100.0</b>         | <b>0</b>                  | <b>0.0</b>   |
|  | Percentage of Total Farms:      |                                    |                          | 99.4             |  | 0.6                  |                           | 0.0          |
| 2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS |                                 |                                    |                          |                  |  |                      |                           |              |
| Note: Percentages may not add to 100.0 percent due to rounding                   |                                 |                                    |                          |                  |  |                      |                           |              |

| <b>Geographic Distribution of HMDA Reportable Loans</b> |                     |                                     |              |              |               |              |              |                            |
|---|---------------------|-------------------------------------|--------------|--------------|---------------|--------------|--------------|----------------------------|
| <b>Assessment Area: 2019 Eastern IN Non MSA</b>         |                     |                                     |              |              |               |              |              |                            |
| Product Type  | Tract Income Levels | Bank & Aggregate Lending Comparison |              |              |               |              |              | Owner Occupied % of Units  |
|   |                     | Count                               |              | Dollar       |               | Agg          |              |                            |
|   |                     | #                                   | %            | \$ (000s)    | \$ %          | \$ %         | \$ %         |                            |
| Home Purchase   | Low                 | 0                                   | 0.0          | 0.0          | 0             | 0.0          | 0.0          | 0.0                        |
|   | Moderate            | 6                                   | 3.8          | 9.5          | 524           | 2.8          | 7.1          | 6.5                        |
|   | Middle              | 142                                 | 90.4         | 79.5         | 16,648        | 89.4         | 78.7         | 82.5                       |
|   | Upper               | 9                                   | 5.7          | 10.9         | 1,457         | 7.8          | 14.2         | 11.0                       |
|   | Unknown             | 0                                   | 0.0          | 0.0          | 0             | 0.0          | 0.0          | 0.0                        |
|   | <b>Total</b>        | <b>157</b>                          | <b>100.0</b> | <b>100.0</b> | <b>18,629</b> | <b>100.0</b> | <b>100.0</b> | <b>100.0</b>               |
| Refinance   | Low                 | 0                                   | 0.0          | 0.0          | 0             | 0.0          | 0.0          | 0.0                        |
|   | Moderate            | 6                                   | 7.6          | 5.5          | 393           | 3.8          | 3.3          | 6.5                        |
|   | Middle              | 69                                  | 87.3         | 79.2         | 9,476         | 91.9         | 80.2         | 82.5                       |
|   | Upper               | 4                                   | 5.1          | 15.2         | 446           | 4.3          | 16.5         | 11.0                       |
|   | Unknown             | 0                                   | 0.0          | 0.0          | 0             | 0.0          | 0.0          | 0.0                        |
|   | <b>Total</b>        | <b>79</b>                           | <b>100.0</b> | <b>100.0</b> | <b>10,315</b> | <b>100.0</b> | <b>100.0</b> | <b>100.0</b>               |
| Home Improvement  | Low                 | 0                                   | 0.0          | 0.0          | 0             | 0.0          | 0.0          | 0.0                        |
|   | Moderate            | 1                                   | 8.3          | 6.7          | 63            | 5.8          | 5.0          | 6.5                        |
|   | Middle              | 9                                   | 75.0         | 73.1         | 802           | 74.5         | 71.6         | 82.5                       |
|   | Upper               | 2                                   | 16.7         | 20.2         | 212           | 19.7         | 23.4         | 11.0                       |
|   | Unknown             | 0                                   | 0.0          | 0.0          | 0             | 0.0          | 0.0          | 0.0                        |
|   | <b>Total</b>        | <b>12</b>                           | <b>100.0</b> | <b>100.0</b> | <b>1,077</b>  | <b>100.0</b> | <b>100.0</b> | <b>100.0</b>               |
| Multi-Family  | Low                 | 0                                   | 0.0          | 0.0          | 0             | 0.0          | 0.0          | <b>Multi-Family</b><br>0.0 |
|   | Moderate            | 1                                   | 16.7         | 25.0         | 300           | 22.8         | 20.1         | 6.2                        |
|   | Middle              | 5                                   | 83.3         | 75.0         | 1,015         | 77.2         | 79.9         | 92.3                       |
|   | Upper               | 0                                   | 0.0          | 0.0          | 0             | 0.0          | 0.0          | 1.4                        |
|   | Unknown             | 0                                   | 0.0          | 0.0          | 0             | 0.0          | 0.0          | 0.0                        |
|   | <b>Total</b>        | <b>6</b>                            | <b>100.0</b> | <b>100.0</b> | <b>1,315</b>  | <b>100.0</b> | <b>100.0</b> | <b>100.0</b>               |
| Other Purpose LOC                                       | Low                 | 0                                   | 0.0          | 0.0          | 0             | 0.0          | 0.0          | 0.0                        |
|   | Moderate            | 0                                   | 0.0          | 6.9          | 0             | 0.0          | 2.8          | 6.5                        |
|   | Middle              | 0                                   | 0.0          | 77.1         | 0             | 0.0          | 77.8         | 82.5                       |
|   | Upper               | 0                                   | 0.0          | 16.0         | 0             | 0.0          | 19.4         | 11.0                       |
|   | Unknown             | 0                                   | 0.0          | 0.0          | 0             | 0.0          | 0.0          | 0.0                        |
|   | <b>Total</b>        | <b>0</b>                            | <b>0.0</b>   | <b>100.0</b> | <b>0</b>      | <b>0.0</b>   | <b>100.0</b> | <b>100.0</b>               |
| Other Purpose Closed/Exempt                             | Low                 | 0                                   | 0.0          | 0.0          | 0             | 0.0          | 0.0          | 0.0                        |
|   | Moderate            | 0                                   | 0.0          | 5.5          | 0             | 0.0          | 4.3          | 6.5                        |
|   | Middle              | 0                                   | 0.0          | 70.9         | 0             | 0.0          | 67.2         | 82.5                       |
|   | Upper               | 0                                   | 0.0          | 23.6         | 0             | 0.0          | 28.5         | 11.0                       |
|   | Unknown             | 0                                   | 0.0          | 0.0          | 0             | 0.0          | 0.0          | 0.0                        |
|   | <b>Total</b>        | <b>0</b>                            | <b>0.0</b>   | <b>100.0</b> | <b>0</b>      | <b>0.0</b>   | <b>100.0</b> | <b>100.0</b>               |
| Loan Purpose Not Applicable                             | Low                 | 0                                   | 0.0          | 0.0          | 0             | 0.0          | 0.0          | 0.0                        |
|   | Moderate            | 0                                   | 0.0          | 13.5         | 0             | 0.0          | 12.2         | 6.5                        |
|   | Middle              | 0                                   | 0.0          | 86.5         | 0             | 0.0          | 87.8         | 82.5                       |
|   | Upper               | 0                                   | 0.0          | 0.0          | 0             | 0.0          | 0.0          | 11.0                       |
|   | Unknown             | 0                                   | 0.0          | 0.0          | 0             | 0.0          | 0.0          | 0.0                        |
|   | <b>Total</b>        | <b>0</b>                            | <b>0.0</b>   | <b>100.0</b> | <b>0</b>      | <b>0.0</b>   | <b>100.0</b> | <b>100.0</b>               |
| HMDA Totals   | Low                 | 0                                   | 0.0          | 0.0          | 0             | 0.0          | 0.0          | 0.0                        |
|   | Moderate            | 14                                  | 5.5          | 7.9          | 1,280         | 4.1          | 5.6          | 6.5                        |
|   | Middle              | 225                                 | 88.6         | 78.9         | 27,941        | 89.2         | 79.1         | 82.5                       |
|   | Upper               | 15                                  | 5.9          | 13.2         | 2,115         | 6.7          | 15.3         | 11.0                       |
|   | Unknown             | 0                                   | 0.0          | 0.0          | 0             | 0.0          | 0.0          | 0.0                        |
|   | <b>Total</b>        | <b>254</b>                          | <b>100.0</b> | <b>100.0</b> | <b>31,336</b> | <b>100.0</b> | <b>100.0</b> | <b>100.0</b>               |

Originations & Purchases  
2016 FFIEC Census Data  
*Note: Percentages may not add to 100.0 percent due to rounding*

| <b>Borrower Distribution of HMDA Reportable Loans</b> |                        |                                     |            |              |              |               |              |                             |
|---|------------------------|-------------------------------------|------------|--------------|--------------|---------------|--------------|-----------------------------|
| <b>Assessment Area: 2019 Eastern IN Non MSA</b>       |                        |                                     |            |              |              |               |              |                             |
| Product Type  | Borrower Income Levels | Bank & Aggregate Lending Comparison |            |              |              |               |              | Families by Family Income % |
|   |                        | 2019                                |            |              | 2019         |               |              |                             |
|   |                        | Count Bank                          |            | Agg %        | Dollar Bank  |               | Agg \$ %     |                             |
|   |                        | #                                   | %          | %            | \$(000s)     | \$ %          | \$ %         |                             |
| Home Purchase   | Low                    | 12                                  | 7.6        | 8.4          | 892          | 4.8           | 5.5          | 16.7                        |
|   | Moderate               | 53                                  | 33.8       | 33.0         | 4,307        | 23.1          | 26.1         | 17.0                        |
|   | Middle                 | 34                                  | 21.7       | 22.2         | 4,580        | 24.6          | 23.3         | 25.4                        |
|   | Upper                  | 46                                  | 29.3       | 23.7         | 7,887        | 42.3          | 32.9         | 40.9                        |
|   | Unknown                | 12                                  | 7.6        | 12.6         | 963          | 5.2           | 12.2         | 0.0                         |
|   | <b>Total</b>           |                                     | <b>157</b> | <b>100.0</b> | <b>100.0</b> | <b>18,629</b> | <b>100.0</b> | <b>100.0</b>                |
| Refinance   | Low                    | 7                                   | 8.9        | 11.6         | 417          | 4.0           | 7.1          | 16.7                        |
|   | Moderate               | 23                                  | 29.1       | 21.8         | 2,844        | 27.6          | 17.4         | 17.0                        |
|   | Middle                 | 24                                  | 30.4       | 24.7         | 3,543        | 34.3          | 23.5         | 25.4                        |
|   | Upper                  | 21                                  | 26.6       | 30.8         | 2,849        | 27.6          | 38.1         | 40.9                        |
|   | Unknown                | 4                                   | 5.1        | 11.1         | 662          | 6.4           | 13.9         | 0.0                         |
|   | <b>Total</b>           |                                     | <b>79</b>  | <b>100.0</b> | <b>100.0</b> | <b>10,315</b> | <b>100.0</b> | <b>100.0</b>                |
| Home Improvement                                      | Low                    | 2                                   | 16.7       | 12.6         | 100          | 9.3           | 15.9         | 16.7                        |
|   | Moderate               | 3                                   | 25.0       | 16.0         | 163          | 15.1          | 12.8         | 17.0                        |
|   | Middle                 | 4                                   | 33.3       | 30.3         | 490          | 45.5          | 27.6         | 25.4                        |
|   | Upper                  | 3                                   | 25.0       | 38.7         | 324          | 30.1          | 42.0         | 40.9                        |
|   | Unknown                | 0                                   | 0.0        | 2.5          | 0            | 0.0           | 1.6          | 0.0                         |
|   | <b>Total</b>           |                                     | <b>12</b>  | <b>100.0</b> | <b>100.0</b> | <b>1,077</b>  | <b>100.0</b> | <b>100.0</b>                |
| Multi-Family  | Low                    | 1                                   | 16.7       | 12.5         | 49           | 3.7           | 2.5          | 16.7                        |
|   | Moderate               | 0                                   | 0.0        | 0.0          | 0            | 0.0           | 0.0          | 17.0                        |
|   | Middle                 | 0                                   | 0.0        | 0.0          | 0            | 0.0           | 0.0          | 25.4                        |
|   | Upper                  | 0                                   | 0.0        | 0.0          | 0            | 0.0           | 0.0          | 40.9                        |
|   | Unknown                | 5                                   | 83.3       | 87.5         | 1,266        | 96.3          | 97.5         | 0.0                         |
|   | <b>Total</b>           |                                     | <b>6</b>   | <b>100.0</b> | <b>100.0</b> | <b>1,315</b>  | <b>100.0</b> | <b>100.0</b>                |
| Other Purpose LOC                                     | Low                    | 0                                   | 0.0        | 9.7          | 0            | 0.0           | 5.2          | 16.7                        |
|   | Moderate               | 0                                   | 0.0        | 17.4         | 0            | 0.0           | 14.7         | 17.0                        |
|   | Middle                 | 0                                   | 0.0        | 31.3         | 0            | 0.0           | 30.7         | 25.4                        |
|   | Upper                  | 0                                   | 0.0        | 39.6         | 0            | 0.0           | 46.0         | 40.9                        |
|   | Unknown                | 0                                   | 0.0        | 2.1          | 0            | 0.0           | 3.3          | 0.0                         |
|   | <b>Total</b>           |                                     | <b>0</b>   | <b>0.0</b>   | <b>100.0</b> | <b>0</b>      | <b>0.0</b>   | <b>100.0</b>                |
| Other Purpose Closed/Exempt                           | Low                    | 0                                   | 0.0        | 12.7         | 0            | 0.0           | 7.2          | 16.7                        |
|   | Moderate               | 0                                   | 0.0        | 27.3         | 0            | 0.0           | 20.9         | 17.0                        |
|   | Middle                 | 0                                   | 0.0        | 14.5         | 0            | 0.0           | 9.5          | 25.4                        |
|   | Upper                  | 0                                   | 0.0        | 38.2         | 0            | 0.0           | 41.3         | 40.9                        |
|   | Unknown                | 0                                   | 0.0        | 7.3          | 0            | 0.0           | 21.1         | 0.0                         |
|   | <b>Total</b>           |                                     | <b>0</b>   | <b>0.0</b>   | <b>100.0</b> | <b>0</b>      | <b>0.0</b>   | <b>100.0</b>                |
| Loan Purpose Not Applicable                           | Low                    | 0                                   | 0.0        | 0.0          | 0            | 0.0           | 0.0          | 16.7                        |
|   | Moderate               | 0                                   | 0.0        | 0.0          | 0            | 0.0           | 0.0          | 17.0                        |
|   | Middle                 | 0                                   | 0.0        | 0.0          | 0            | 0.0           | 0.0          | 25.4                        |
|   | Upper                  | 0                                   | 0.0        | 0.0          | 0            | 0.0           | 0.0          | 40.9                        |
|   | Unknown                | 0                                   | 0.0        | 100.0        | 0            | 0.0           | 100.0        | 0.0                         |
|   | <b>Total</b>           |                                     | <b>0</b>   | <b>0.0</b>   | <b>100.0</b> | <b>0</b>      | <b>0.0</b>   | <b>100.0</b>                |
| HMDA Totals   | Low                    | 22                                  | 8.7        | 9.8          | 1,458        | 4.7           | 6.2          | 16.7                        |
|   | Moderate               | 79                                  | 31.1       | 26.7         | 7,314        | 23.3          | 21.7         | 17.0                        |
|   | Middle                 | 62                                  | 24.4       | 23.4         | 8,613        | 27.5          | 23.1         | 25.4                        |
|   | Upper                  | 70                                  | 27.6       | 27.7         | 11,060       | 35.3          | 34.9         | 40.9                        |
|   | Unknown                | 21                                  | 8.3        | 12.4         | 2,891        | 9.2           | 14.1         | 0.0                         |
|   | <b>Total</b>           |                                     | <b>254</b> | <b>100.0</b> | <b>100.0</b> | <b>31,336</b> | <b>100.0</b> | <b>100.0</b>                |

Originations & Purchases

2016 FFIEC Census Data

Note: Percentages may not add to 100.0 percent due to rounding



| <b>Borrower Distribution of HMDA Reportable Loans</b> |                        |                                     |              |              |            |              |              |                             |
|---|------------------------|-------------------------------------|--------------|--------------|------------|--------------|--------------|-----------------------------|
| <b>Assessment Area: 2019 Kokomo, IN MSA 29020</b>     |                        |                                     |              |              |            |              |              |                             |
| Product Type  | Borrower Income Levels | Bank & Aggregate Lending Comparison |              |              |            |              |              | Families by Family Income % |
|   |                        | 2019                                |              |              | Dollar     |              |              |                             |
|   |                        | Count Bank                          |              | Agg %        | Bank       |              | Agg %        |                             |
|   |                        | #                                   | %            | %            | \$(000s)   | \$ %         | \$ %         |                             |
| Home Purchase   | Low                    | 1                                   | 25.0         | 12.6         | 53         | 15.5         | 7.3          | 22.2                        |
|   | Moderate               | 0                                   | 0.0          | 25.3         | 0          | 0.0          | 20.2         | 16.6                        |
|   | Middle                 | 1                                   | 25.0         | 23.2         | 61         | 17.8         | 24.8         | 21.1                        |
|   | Upper                  | 1                                   | 25.0         | 23.8         | 180        | 52.5         | 33.3         | 40.0                        |
|   | Unknown                | 1                                   | 25.0         | 15.1         | 49         | 14.3         | 14.3         | 0.0                         |
|   | <b>Total</b>           | <b>4</b>                            | <b>100.0</b> | <b>100.0</b> | <b>343</b> | <b>100.0</b> | <b>100.0</b> | <b>100.0</b>                |
| Refinance   | Low                    | 0                                   | 0.0          | 8.9          | 0          | 0.0          | 4.6          | 22.2                        |
|   | Moderate               | 2                                   | 50.0         | 19.3         | 128        | 36.3         | 13.0         | 16.6                        |
|   | Middle                 | 0                                   | 0.0          | 22.6         | 0          | 0.0          | 20.3         | 21.1                        |
|   | Upper                  | 2                                   | 50.0         | 28.8         | 225        | 63.7         | 36.7         | 40.0                        |
|   | Unknown                | 0                                   | 0.0          | 20.4         | 0          | 0.0          | 25.3         | 0.0                         |
|   | <b>Total</b>           | <b>4</b>                            | <b>100.0</b> | <b>100.0</b> | <b>353</b> | <b>100.0</b> | <b>100.0</b> | <b>100.0</b>                |
| Home Improvement                                      | Low                    | 0                                   | 0.0          | 12.0         | 0          | 0.0          | 9.1          | 22.2                        |
|   | Moderate               | 0                                   | 0.0          | 13.3         | 0          | 0.0          | 7.5          | 16.6                        |
|   | Middle                 | 0                                   | 0.0          | 31.3         | 0          | 0.0          | 26.6         | 21.1                        |
|   | Upper                  | 0                                   | 0.0          | 39.8         | 0          | 0.0          | 49.7         | 40.0                        |
|   | Unknown                | 0                                   | 0.0          | 3.6          | 0          | 0.0          | 7.1          | 0.0                         |
|   | <b>Total</b>           | <b>0</b>                            | <b>0.0</b>   | <b>100.0</b> | <b>0</b>   | <b>0.0</b>   | <b>100.0</b> | <b>100.0</b>                |
| Multi-Family  | Low                    | 0                                   | 0.0          | 0.0          | 0          | 0.0          | 0.0          | 22.2                        |
|   | Moderate               | 0                                   | 0.0          | 0.0          | 0          | 0.0          | 0.0          | 16.6                        |
|   | Middle                 | 0                                   | 0.0          | 0.0          | 0          | 0.0          | 0.0          | 21.1                        |
|   | Upper                  | 0                                   | 0.0          | 0.0          | 0          | 0.0          | 0.0          | 40.0                        |
|   | Unknown                | 0                                   | 0.0          | 100.0        | 0          | 0.0          | 100.0        | 0.0                         |
|   | <b>Total</b>           | <b>0</b>                            | <b>0.0</b>   | <b>100.0</b> | <b>0</b>   | <b>0.0</b>   | <b>100.0</b> | <b>100.0</b>                |
| Other Purpose LOC                                     | Low                    | 0                                   | 0.0          | 20.0         | 0          | 0.0          | 7.8          | 22.2                        |
|   | Moderate               | 0                                   | 0.0          | 25.7         | 0          | 0.0          | 23.8         | 16.6                        |
|   | Middle                 | 0                                   | 0.0          | 22.9         | 0          | 0.0          | 34.1         | 21.1                        |
|   | Upper                  | 0                                   | 0.0          | 28.6         | 0          | 0.0          | 31.8         | 40.0                        |
|   | Unknown                | 0                                   | 0.0          | 2.9          | 0          | 0.0          | 2.6          | 0.0                         |
|   | <b>Total</b>           | <b>0</b>                            | <b>0.0</b>   | <b>100.0</b> | <b>0</b>   | <b>0.0</b>   | <b>100.0</b> | <b>100.0</b>                |
| Other Purpose Closed/Exempt                           | Low                    | 0                                   | 0.0          | 6.3          | 0          | 0.0          | 4.8          | 22.2                        |
|   | Moderate               | 0                                   | 0.0          | 26.6         | 0          | 0.0          | 19.8         | 16.6                        |
|   | Middle                 | 0                                   | 0.0          | 31.5         | 0          | 0.0          | 27.2         | 21.1                        |
|   | Upper                  | 0                                   | 0.0          | 34.7         | 0          | 0.0          | 46.8         | 40.0                        |
|   | Unknown                | 0                                   | 0.0          | 0.9          | 0          | 0.0          | 1.4          | 0.0                         |
|   | <b>Total</b>           | <b>0</b>                            | <b>0.0</b>   | <b>100.0</b> | <b>0</b>   | <b>0.0</b>   | <b>100.0</b> | <b>100.0</b>                |
| Loan Purpose Not Applicable                           | Low                    | 0                                   | 0.0          | 0.0          | 0          | 0.0          | 0.0          | 22.2                        |
|   | Moderate               | 0                                   | 0.0          | 1.4          | 0          | 0.0          | 1.7          | 16.6                        |
|   | Middle                 | 0                                   | 0.0          | 0.0          | 0          | 0.0          | 0.0          | 21.1                        |
|   | Upper                  | 0                                   | 0.0          | 0.0          | 0          | 0.0          | 0.0          | 40.0                        |
|   | Unknown                | 0                                   | 0.0          | 98.6         | 0          | 0.0          | 98.3         | 0.0                         |
|   | <b>Total</b>           | <b>0</b>                            | <b>0.0</b>   | <b>100.0</b> | <b>0</b>   | <b>0.0</b>   | <b>100.0</b> | <b>100.0</b>                |
| HMDA Totals   | Low                    | 1                                   | 12.5         | 10.8         | 53         | 7.6          | 6.0          | 22.2                        |
|   | Moderate               | 2                                   | 25.0         | 22.7         | 128        | 18.4         | 16.6         | 16.6                        |
|   | Middle                 | 1                                   | 12.5         | 23.3         | 61         | 8.8          | 21.8         | 21.1                        |
|   | Upper                  | 3                                   | 37.5         | 25.9         | 405        | 58.2         | 32.4         | 40.0                        |
|   | Unknown                | 1                                   | 12.5         | 17.4         | 49         | 7.0          | 23.2         | 0.0                         |
|   | <b>Total</b>           | <b>8</b>                            | <b>100.0</b> | <b>100.0</b> | <b>696</b> | <b>100.0</b> | <b>100.0</b> | <b>100.0</b>                |

Originations & Purchases

2016 FFIEC Census Data

Note: Percentages may not add to 100.0 percent due to rounding

| Geographic Distribution of HMDA Reportable Loans |                     |                                     |          |              |              |            |              |                            |
|--|---------------------|-------------------------------------|----------|--------------|--------------|------------|--------------|----------------------------|
| Assessment Area: 2019 Western IN Non MSA         |                     |                                     |          |              |              |            |              |                            |
| Product Type                                     | Tract Income Levels | Bank & Aggregate Lending Comparison |          |              |              |            |              | Owner Occupied % of Units  |
|  |                     | 2019                                |          | 2019         |              | 2019       |              |                            |
|  |                     | Count Bank                          | Agg      | Dollar Bank  | Agg          | Agg        |              |                            |
|  |                     | #                                   | %        | \$ %         | \$ (000s)    | \$ %       | \$ %         |                            |
| Home Purchase                                    | Low                 | 0                                   | 0.0      | 0.0          | 0            | 0.0        | 0.0          | 0.0                        |
|  | Moderate            | 3                                   | 75.0     | 12.8         | 79           | 53.4       | 7.6          | 10.7                       |
|  | Middle              | 1                                   | 25.0     | 87.2         | 69           | 46.6       | 92.4         | 89.3                       |
|  | Upper               | 0                                   | 0.0      | 0.0          | 0            | 0.0        | 0.0          | 0.0                        |
|  | Unknown             | 0                                   | 0.0      | 0.0          | 0            | 0.0        | 0.0          | 0.0                        |
|  | <b>Total</b>        |                                     | <b>4</b> | <b>100.0</b> | <b>100.0</b> | <b>148</b> | <b>100.0</b> | <b>100.0</b>               |
| Refinance  | Low                 | 0                                   | 0.0      | 0.0          | 0            | 0.0        | 0.0          | 0.0                        |
|  | Moderate            | 0                                   | 0.0      | 4.1          | 0            | 0.0        | 2.6          | 10.7                       |
|  | Middle              | 2                                   | 100.0    | 95.9         | 141          | 100.0      | 97.4         | 89.3                       |
|  | Upper               | 0                                   | 0.0      | 0.0          | 0            | 0.0        | 0.0          | 0.0                        |
|  | Unknown             | 0                                   | 0.0      | 0.0          | 0            | 0.0        | 0.0          | 0.0                        |
|  | <b>Total</b>        |                                     | <b>2</b> | <b>100.0</b> | <b>100.0</b> | <b>141</b> | <b>100.0</b> | <b>100.0</b>               |
| Home Improvement                                 | Low                 | 0                                   | 0.0      | 0.0          | 0            | 0.0        | 0.0          | 0.0                        |
|  | Moderate            | 0                                   | 0.0      | 19.0         | 0            | 0.0        | 16.0         | 10.7                       |
|  | Middle              | 1                                   | 100.0    | 81.0         | 30           | 100.0      | 84.0         | 89.3                       |
|  | Upper               | 0                                   | 0.0      | 0.0          | 0            | 0.0        | 0.0          | 0.0                        |
|  | Unknown             | 0                                   | 0.0      | 0.0          | 0            | 0.0        | 0.0          | 0.0                        |
|  | <b>Total</b>        |                                     | <b>1</b> | <b>100.0</b> | <b>100.0</b> | <b>30</b>  | <b>100.0</b> | <b>100.0</b>               |
| Multi-Family                                     | Low                 | 0                                   | 0.0      | 0.0          | 0            | 0.0        | 0.0          | <b>Multi-Family</b><br>0.0 |
|  | Moderate            | 0                                   | 0.0      | 33.3         | 0            | 0.0        | 30.8         | 15.2                       |
|  | Middle              | 1                                   | 100.0    | 66.7         | 80           | 100.0      | 69.2         | 84.8                       |
|  | Upper               | 0                                   | 0.0      | 0.0          | 0            | 0.0        | 0.0          | 0.0                        |
|  | Unknown             | 0                                   | 0.0      | 0.0          | 0            | 0.0        | 0.0          | 0.0                        |
|  | <b>Total</b>        |                                     | <b>1</b> | <b>100.0</b> | <b>100.0</b> | <b>80</b>  | <b>100.0</b> | <b>100.0</b>               |
| Other Purpose LOC                                | Low                 | 0                                   | 0.0      | 0.0          | 0            | 0.0        | 0.0          | 0.0                        |
|  | Moderate            | 0                                   | 0.0      | 10.0         | 0            | 0.0        | 6.9          | 10.7                       |
|  | Middle              | 0                                   | 0.0      | 90.0         | 0            | 0.0        | 93.1         | 89.3                       |
|  | Upper               | 0                                   | 0.0      | 0.0          | 0            | 0.0        | 0.0          | 0.0                        |
|  | Unknown             | 0                                   | 0.0      | 0.0          | 0            | 0.0        | 0.0          | 0.0                        |
|  | <b>Total</b>        |                                     | <b>0</b> | <b>0.0</b>   | <b>100.0</b> | <b>0</b>   | <b>0.0</b>   | <b>100.0</b>               |
| Other Purpose Closed/Exempt                      | Low                 | 0                                   | 0.0      | 0.0          | 0            | 0.0        | 0.0          | 0.0                        |
|  | Moderate            | 0                                   | 0.0      | 17.4         | 0            | 0.0        | 12.1         | 10.7                       |
|  | Middle              | 0                                   | 0.0      | 82.6         | 0            | 0.0        | 87.9         | 89.3                       |
|  | Upper               | 0                                   | 0.0      | 0.0          | 0            | 0.0        | 0.0          | 0.0                        |
|  | Unknown             | 0                                   | 0.0      | 0.0          | 0            | 0.0        | 0.0          | 0.0                        |
|  | <b>Total</b>        |                                     | <b>0</b> | <b>0.0</b>   | <b>100.0</b> | <b>0</b>   | <b>0.0</b>   | <b>100.0</b>               |
| Loan Purpose Not Applicable                      | Low                 | 0                                   | 0.0      | 0.0          | 0            | 0.0        | 0.0          | 0.0                        |
|  | Moderate            | 0                                   | 0.0      | 31.3         | 0            | 0.0        | 27.0         | 10.7                       |
|  | Middle              | 0                                   | 0.0      | 68.8         | 0            | 0.0        | 73.0         | 89.3                       |
|  | Upper               | 0                                   | 0.0      | 0.0          | 0            | 0.0        | 0.0          | 0.0                        |
|  | Unknown             | 0                                   | 0.0      | 0.0          | 0            | 0.0        | 0.0          | 0.0                        |
|  | <b>Total</b>        |                                     | <b>0</b> | <b>0.0</b>   | <b>100.0</b> | <b>0</b>   | <b>0.0</b>   | <b>100.0</b>               |
| HMDA Totals                                      | Low                 | 0                                   | 0.0      | 0.0          | 0            | 0.0        | 0.0          | 0.0                        |
|  | Moderate            | 3                                   | 37.5     | 10.7         | 79           | 19.8       | 6.6          | 10.7                       |
|  | Middle              | 5                                   | 62.5     | 89.3         | 320          | 80.2       | 93.4         | 89.3                       |
|  | Upper               | 0                                   | 0.0      | 0.0          | 0            | 0.0        | 0.0          | 0.0                        |
|  | Unknown             | 0                                   | 0.0      | 0.0          | 0            | 0.0        | 0.0          | 0.0                        |
|  | <b>Total</b>        |                                     | <b>8</b> | <b>100.0</b> | <b>100.0</b> | <b>399</b> | <b>100.0</b> | <b>100.0</b>               |

Originations & Purchases

2016 FFIEC Census Data

Note: Percentages may not add to 100.0 percent due to rounding

| <b>Borrower Distribution of HMDA Reportable Loans</b> |                        |                                     |          |              |              |            |              |                             |
|---|------------------------|-------------------------------------|----------|--------------|--------------|------------|--------------|-----------------------------|
| <b>Assessment Area: 2019 Western IN Non MSA</b>       |                        |                                     |          |              |              |            |              |                             |
| Product Type  | Borrower Income Levels | Bank & Aggregate Lending Comparison |          |              |              |            |              | Families by Family Income % |
|   |                        | 2019                                |          |              | Dollar       |            |              |                             |
|   |                        | Count Bank                          |          | Agg %        | Bank         |            | Agg          |                             |
|   |                        | #                                   | %        | %            | \$(000s)     | \$ %       | \$ %         |                             |
| Home Purchase   | Low                    | 0                                   | 0.0      | 12.6         | 0            | 0.0        | 8.1          | 21.1                        |
|   | Moderate               | 0                                   | 0.0      | 28.5         | 0            | 0.0        | 23.1         | 17.3                        |
|   | Middle                 | 1                                   | 25.0     | 22.0         | 69           | 46.6       | 26.0         | 21.6                        |
|   | Upper                  | 3                                   | 75.0     | 18.3         | 79           | 53.4       | 24.8         | 40.0                        |
|   | Unknown                | 0                                   | 0.0      | 18.6         | 0            | 0.0        | 18.1         | 0.0                         |
|   | <b>Total</b>           |                                     | <b>4</b> | <b>100.0</b> | <b>100.0</b> | <b>148</b> | <b>100.0</b> | <b>100.0</b>                |
| Refinance   | Low                    | 0                                   | 0.0      | 6.6          | 0            | 0.0        | 4.0          | 21.1                        |
|   | Moderate               | 1                                   | 50.0     | 20.2         | 51           | 36.2       | 13.7         | 17.3                        |
|   | Middle                 | 1                                   | 50.0     | 23.0         | 90           | 63.8       | 21.6         | 21.6                        |
|   | Upper                  | 0                                   | 0.0      | 36.2         | 0            | 0.0        | 41.1         | 40.0                        |
|   | Unknown                | 0                                   | 0.0      | 14.0         | 0            | 0.0        | 19.7         | 0.0                         |
|   | <b>Total</b>           |                                     | <b>2</b> | <b>100.0</b> | <b>100.0</b> | <b>141</b> | <b>100.0</b> | <b>100.0</b>                |
| Home Improvement                                      | Low                    | 0                                   | 0.0      | 19.0         | 0            | 0.0        | 13.1         | 21.1                        |
|   | Moderate               | 0                                   | 0.0      | 9.5          | 0            | 0.0        | 8.5          | 17.3                        |
|   | Middle                 | 0                                   | 0.0      | 33.3         | 0            | 0.0        | 27.7         | 21.6                        |
|   | Upper                  | 1                                   | 100.0    | 38.1         | 30           | 100.0      | 50.7         | 40.0                        |
|   | Unknown                | 0                                   | 0.0      | 0.0          | 0            | 0.0        | 0.0          | 0.0                         |
|   | <b>Total</b>           |                                     | <b>1</b> | <b>100.0</b> | <b>100.0</b> | <b>30</b>  | <b>100.0</b> | <b>100.0</b>                |
| Multi-Family  | Low                    | 0                                   | 0.0      | 0.0          | 0            | 0.0        | 0.0          | 21.1                        |
|   | Moderate               | 0                                   | 0.0      | 0.0          | 0            | 0.0        | 0.0          | 17.3                        |
|   | Middle                 | 0                                   | 0.0      | 0.0          | 0            | 0.0        | 0.0          | 21.6                        |
|   | Upper                  | 1                                   | 100.0    | 16.7         | 80           | 100.0      | 4.9          | 40.0                        |
|   | Unknown                | 0                                   | 0.0      | 83.3         | 0            | 0.0        | 95.1         | 0.0                         |
|   | <b>Total</b>           |                                     | <b>1</b> | <b>100.0</b> | <b>100.0</b> | <b>80</b>  | <b>100.0</b> | <b>100.0</b>                |
| Other Purpose LOC                                     | Low                    | 0                                   | 0.0      | 10.0         | 0            | 0.0        | 6.6          | 21.1                        |
|   | Moderate               | 0                                   | 0.0      | 20.0         | 0            | 0.0        | 11.8         | 17.3                        |
|   | Middle                 | 0                                   | 0.0      | 50.0         | 0            | 0.0        | 42.6         | 21.6                        |
|   | Upper                  | 0                                   | 0.0      | 20.0         | 0            | 0.0        | 39.0         | 40.0                        |
|   | Unknown                | 0                                   | 0.0      | 0.0          | 0            | 0.0        | 0.0          | 0.0                         |
|   | <b>Total</b>           |                                     | <b>0</b> | <b>0.0</b>   | <b>100.0</b> | <b>0</b>   | <b>0.0</b>   | <b>100.0</b>                |
| Other Purpose Closed/Exempt                           | Low                    | 0                                   | 0.0      | 13.0         | 0            | 0.0        | 8.3          | 21.1                        |
|   | Moderate               | 0                                   | 0.0      | 4.3          | 0            | 0.0        | 1.0          | 17.3                        |
|   | Middle                 | 0                                   | 0.0      | 30.4         | 0            | 0.0        | 28.8         | 21.6                        |
|   | Upper                  | 0                                   | 0.0      | 52.2         | 0            | 0.0        | 61.9         | 40.0                        |
|   | Unknown                | 0                                   | 0.0      | 0.0          | 0            | 0.0        | 0.0          | 0.0                         |
|   | <b>Total</b>           |                                     | <b>0</b> | <b>0.0</b>   | <b>100.0</b> | <b>0</b>   | <b>0.0</b>   | <b>100.0</b>                |
| Loan Purpose Not Applicable                           | Low                    | 0                                   | 0.0      | 0.0          | 0            | 0.0        | 0.0          | 21.1                        |
|   | Moderate               | 0                                   | 0.0      | 0.0          | 0            | 0.0        | 0.0          | 17.3                        |
|   | Middle                 | 0                                   | 0.0      | 0.0          | 0            | 0.0        | 0.0          | 21.6                        |
|   | Upper                  | 0                                   | 0.0      | 0.0          | 0            | 0.0        | 0.0          | 40.0                        |
|   | Unknown                | 0                                   | 0.0      | 100.0        | 0            | 0.0        | 100.0        | 0.0                         |
|   | <b>Total</b>           |                                     | <b>0</b> | <b>0.0</b>   | <b>100.0</b> | <b>0</b>   | <b>0.0</b>   | <b>100.0</b>                |
| HMDA Totals   | Low                    | 0                                   | 0.0      | 10.3         | 0            | 0.0        | 6.3          | 21.1                        |
|   | Moderate               | 1                                   | 12.5     | 23.2         | 51           | 12.8       | 18.2         | 17.3                        |
|   | Middle                 | 2                                   | 25.0     | 23.1         | 159          | 39.8       | 23.6         | 21.6                        |
|   | Upper                  | 5                                   | 62.5     | 25.7         | 189          | 47.4       | 31.0         | 40.0                        |
|   | Unknown                | 0                                   | 0.0      | 17.7         | 0            | 0.0        | 20.9         | 0.0                         |
|   | <b>Total</b>           |                                     | <b>8</b> | <b>100.0</b> | <b>100.0</b> | <b>399</b> | <b>100.0</b> | <b>100.0</b>                |

Originations & Purchases  
2016 FFIEC Census Data

Note: Percentages may not add to 100.0 percent due to rounding



| Geographic Distribution of HMDA Reportable Loans |                     |                                     |           |              |              |              |              |                            |
|--|---------------------|-------------------------------------|-----------|--------------|--------------|--------------|--------------|----------------------------|
| Assessment Area: 2019 OH Non MSA                 |                     |                                     |           |              |              |              |              |                            |
| Product Type                                     | Tract Income Levels | Bank & Aggregate Lending Comparison |           |              |              |              |              | Owner Occupied % of Units  |
|  |                     | Count Bank                          |           | Agg          | Dollar Bank  |              | Agg          |                            |
|  |                     | #                                   | %         | %            | \$ (000s)    | \$ %         | \$ %         |                            |
| Home Purchase                                    | Low                 | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | Moderate            | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | Middle              | 5                                   | 71.4      | 82.7         | 445          | 73.0         | 80.5         | 82.2                       |
|  | Upper               | 2                                   | 28.6      | 17.3         | 165          | 27.0         | 19.5         | 17.8                       |
|  | Unknown             | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | <b>Total</b>        |                                     | <b>7</b>  | <b>100.0</b> | <b>100.0</b> | <b>610</b>   | <b>100.0</b> | <b>100.0</b>               |
| Refinance  | Low                 | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | Moderate            | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | Middle              | 6                                   | 85.7      | 82.5         | 550          | 83.8         | 78.4         | 82.2                       |
|  | Upper               | 1                                   | 14.3      | 17.5         | 106          | 16.2         | 21.6         | 17.8                       |
|  | Unknown             | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | <b>Total</b>        |                                     | <b>7</b>  | <b>100.0</b> | <b>100.0</b> | <b>656</b>   | <b>100.0</b> | <b>100.0</b>               |
| Home Improvement                                 | Low                 | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | Moderate            | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | Middle              | 1                                   | 100.0     | 88.6         | 10           | 100.0        | 87.6         | 82.2                       |
|  | Upper               | 0                                   | 0.0       | 11.4         | 0            | 0.0          | 12.4         | 17.8                       |
|  | Unknown             | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | <b>Total</b>        |                                     | <b>1</b>  | <b>100.0</b> | <b>100.0</b> | <b>10</b>    | <b>100.0</b> | <b>100.0</b>               |
| Multi-Family                                     | Low                 | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | <b>Multi-Family</b><br>0.0 |
|  | Moderate            | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | Middle              | 1                                   | 100.0     | 100.0        | 103          | 100.0        | 100.0        | 90.4                       |
|  | Upper               | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 9.6                        |
|  | Unknown             | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | <b>Total</b>        |                                     | <b>1</b>  | <b>100.0</b> | <b>100.0</b> | <b>103</b>   | <b>100.0</b> | <b>100.0</b>               |
| Other Purpose LOC                                | Low                 | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | Moderate            | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | Middle              | 0                                   | 0.0       | 83.3         | 0            | 0.0          | 88.8         | 82.2                       |
|  | Upper               | 0                                   | 0.0       | 16.7         | 0            | 0.0          | 11.2         | 17.8                       |
|  | Unknown             | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | <b>Total</b>        |                                     | <b>0</b>  | <b>0.0</b>   | <b>100.0</b> | <b>0</b>     | <b>0.0</b>   | <b>100.0</b>               |
| Other Purpose Closed/Exempt                      | Low                 | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | Moderate            | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | Middle              | 0                                   | 0.0       | 90.9         | 0            | 0.0          | 89.9         | 82.2                       |
|  | Upper               | 0                                   | 0.0       | 9.1          | 0            | 0.0          | 10.1         | 17.8                       |
|  | Unknown             | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | <b>Total</b>        |                                     | <b>0</b>  | <b>0.0</b>   | <b>100.0</b> | <b>0</b>     | <b>0.0</b>   | <b>100.0</b>               |
| Loan Purpose Not Applicable                      | Low                 | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | Moderate            | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | Middle              | 0                                   | 0.0       | 81.8         | 0            | 0.0          | 76.0         | 82.2                       |
|  | Upper               | 0                                   | 0.0       | 18.2         | 0            | 0.0          | 24.0         | 17.8                       |
|  | Unknown             | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | <b>Total</b>        |                                     | <b>0</b>  | <b>0.0</b>   | <b>100.0</b> | <b>0</b>     | <b>0.0</b>   | <b>100.0</b>               |
| HMDA Totals                                      | Low                 | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | Moderate            | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | Middle              | 13                                  | 81.3      | 83.3         | 1,108        | 80.3         | 80.3         | 82.2                       |
|  | Upper               | 3                                   | 18.8      | 16.7         | 271          | 19.7         | 19.7         | 17.8                       |
|  | Unknown             | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 0.0                        |
|  | <b>Total</b>        |                                     | <b>16</b> | <b>100.0</b> | <b>100.0</b> | <b>1,379</b> | <b>100.0</b> | <b>100.0</b>               |

Originations & Purchases  
2016 FFIEC Census Data

Note: Percentages may not add to 100.0 percent due to rounding

| <b>Borrower Distribution of HMDA Reportable Loans</b> |                        |                                     |           |              |              |              |              |                             |
|---|------------------------|-------------------------------------|-----------|--------------|--------------|--------------|--------------|-----------------------------|
| <b>Assessment Area: 2019 OH Non MSA</b>               |                        |                                     |           |              |              |              |              |                             |
| Product Type  | Borrower Income Levels | Bank & Aggregate Lending Comparison |           |              |              |              |              | Families by Family Income % |
|   |                        | 2019                                |           |              | Dollar       |              |              |                             |
|   |                        | Count                               |           | Agg          | Dollar       | Agg          |              |                             |
|   |                        | #                                   | %         | %            | Bank         | \$ %         | \$ %         |                             |
|   |                        |                                     |           |              | \$(000s)     |              |              |                             |
| Home Purchase   | Low                    | 1                                   | 14.3      | 7.1          | 94           | 15.4         | 5.0          | 16.2                        |
|   | Moderate               | 1                                   | 14.3      | 29.3         | 94           | 15.4         | 24.3         | 18.0                        |
|   | Middle                 | 1                                   | 14.3      | 25.9         | 71           | 11.6         | 24.8         | 23.8                        |
|   | Upper                  | 3                                   | 42.9      | 24.8         | 251          | 41.1         | 35.0         | 42.0                        |
|   | Unknown                | 1                                   | 14.3      | 12.8         | 100          | 16.4         | 10.9         | 0.0                         |
|   | <b>Total</b>           |                                     | <b>7</b>  | <b>100.0</b> | <b>100.0</b> | <b>610</b>   | <b>100.0</b> | <b>100.0</b>                |
| Refinance   | Low                    | 1                                   | 14.3      | 9.0          | 102          | 15.5         | 4.8          | 16.2                        |
|   | Moderate               | 2                                   | 28.6      | 18.5         | 269          | 41.0         | 15.3         | 18.0                        |
|   | Middle                 | 2                                   | 28.6      | 24.0         | 168          | 25.6         | 19.7         | 23.8                        |
|   | Upper                  | 1                                   | 14.3      | 32.0         | 75           | 11.4         | 40.2         | 42.0                        |
|   | Unknown                | 1                                   | 14.3      | 16.5         | 42           | 6.4          | 20.1         | 0.0                         |
|   | <b>Total</b>           |                                     | <b>7</b>  | <b>100.0</b> | <b>100.0</b> | <b>656</b>   | <b>100.0</b> | <b>100.0</b>                |
| Home Improvement                                      | Low                    | 0                                   | 0.0       | 14.3         | 0            | 0.0          | 11.8         | 16.2                        |
|   | Moderate               | 0                                   | 0.0       | 28.6         | 0            | 0.0          | 20.7         | 18.0                        |
|   | Middle                 | 1                                   | 100.0     | 25.7         | 10           | 100.0        | 25.9         | 23.8                        |
|   | Upper                  | 0                                   | 0.0       | 28.6         | 0            | 0.0          | 33.8         | 42.0                        |
|   | Unknown                | 0                                   | 0.0       | 2.9          | 0            | 0.0          | 7.7          | 0.0                         |
|   | <b>Total</b>           |                                     | <b>1</b>  | <b>100.0</b> | <b>100.0</b> | <b>10</b>    | <b>100.0</b> | <b>100.0</b>                |
| Multi-Family  | Low                    | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 16.2                        |
|   | Moderate               | 1                                   | 100.0     | 25.0         | 103          | 100.0        | 17.5         | 18.0                        |
|   | Middle                 | 0                                   | 0.0       | 25.0         | 0            | 0.0          | 25.4         | 23.8                        |
|   | Upper                  | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 42.0                        |
|   | Unknown                | 0                                   | 0.0       | 50.0         | 0            | 0.0          | 57.1         | 0.0                         |
|   | <b>Total</b>           |                                     | <b>1</b>  | <b>100.0</b> | <b>100.0</b> | <b>103</b>   | <b>100.0</b> | <b>100.0</b>                |
| Other Purpose LOC                                     | Low                    | 0                                   | 0.0       | 13.9         | 0            | 0.0          | 5.5          | 16.2                        |
|   | Moderate               | 0                                   | 0.0       | 16.7         | 0            | 0.0          | 11.4         | 18.0                        |
|   | Middle                 | 0                                   | 0.0       | 25.0         | 0            | 0.0          | 35.2         | 23.8                        |
|   | Upper                  | 0                                   | 0.0       | 41.7         | 0            | 0.0          | 43.2         | 42.0                        |
|   | Unknown                | 0                                   | 0.0       | 2.8          | 0            | 0.0          | 4.7          | 0.0                         |
|   | <b>Total</b>           |                                     | <b>0</b>  | <b>0.0</b>   | <b>100.0</b> | <b>0</b>     | <b>0.0</b>   | <b>100.0</b>                |
| Other Purpose Closed/Exempt                           | Low                    | 0                                   | 0.0       | 18.2         | 0            | 0.0          | 11.7         | 16.2                        |
|   | Moderate               | 0                                   | 0.0       | 36.4         | 0            | 0.0          | 46.7         | 18.0                        |
|   | Middle                 | 0                                   | 0.0       | 36.4         | 0            | 0.0          | 21.6         | 23.8                        |
|   | Upper                  | 0                                   | 0.0       | 9.1          | 0            | 0.0          | 20.0         | 42.0                        |
|   | Unknown                | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 0.0                         |
|   | <b>Total</b>           |                                     | <b>0</b>  | <b>0.0</b>   | <b>100.0</b> | <b>0</b>     | <b>0.0</b>   | <b>100.0</b>                |
| Loan Purpose Not Applicable                           | Low                    | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 16.2                        |
|   | Moderate               | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 18.0                        |
|   | Middle                 | 0                                   | 0.0       | 0.0          | 0            | 0.0          | 0.0          | 23.8                        |
|   | Upper                  | 0                                   | 0.0       | 9.1          | 0            | 0.0          | 5.7          | 42.0                        |
|   | Unknown                | 0                                   | 0.0       | 90.9         | 0            | 0.0          | 94.3         | 0.0                         |
|   | <b>Total</b>           |                                     | <b>0</b>  | <b>0.0</b>   | <b>100.0</b> | <b>0</b>     | <b>0.0</b>   | <b>100.0</b>                |
| HMDA Totals   | Low                    | 2                                   | 12.5      | 8.7          | 196          | 14.2         | 5.0          | 16.2                        |
|   | Moderate               | 4                                   | 25.0      | 24.2         | 466          | 33.8         | 20.0         | 18.0                        |
|   | Middle                 | 4                                   | 25.0      | 24.9         | 249          | 18.1         | 22.7         | 23.8                        |
|   | Upper                  | 4                                   | 25.0      | 27.9         | 326          | 23.6         | 36.3         | 42.0                        |
|   | Unknown                | 2                                   | 12.5      | 14.4         | 142          | 10.3         | 16.0         | 0.0                         |
|   | <b>Total</b>           |                                     | <b>16</b> | <b>100.0</b> | <b>100.0</b> | <b>1,379</b> | <b>100.0</b> | <b>100.0</b>                |

Originations & Purchases

2016 FFIEC Census Data

Note: Percentages may not add to 100.0 percent due to rounding

**APPENDIX C – 2020 Lending Tables for Small Business and Small Farm**

| <b>Geographic Distribution of Small Business Loans</b>                           |                            |  |              |                    |              |                         |
|--|----------------------------|--|--------------|--------------------|--------------|-------------------------|
| <b>Assessment Area: 2020 Eastern IN Non MSA</b>                                  |                            |  |              |                    |              |                         |
|  | <b>Tract Income Levels</b> | <b>Bank &amp; Demographic Comparison</b> |              |                    |              |                         |
|  |                            | <b>Count Bank</b>                        |              | <b>Dollar Bank</b> |              | <b>Total Businesses</b> |
|  |                            | <b>#</b>                                 | <b>%</b>     | <b>\$ 000s</b>     | <b>\$ %</b>  | <b>%</b>                |
| <b>Small Business</b>  | Low                        | 0  | 0.0          | 0                  | 0.0          | 0.0                     |
|  | Moderate                   | 1  | 6.7          | 856                | 35.3         | 8.4                     |
|  | Middle                     | 14                                       | 93.3         | 1,569              | 64.7         | 82.2                    |
|  | Upper                      | 0  | 0.0          | 0                  | 0.0          | 9.4                     |
|  | Unknown                    | 0  | 0.0          | 0                  | 0.0          | 0.0                     |
|  | <b>Total</b>               | <b>15</b>                                | <b>100.0</b> | <b>2,425</b>       | <b>100.0</b> | <b>100.0</b>            |
| 2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS |                            |  |              |                    |              |                         |
| <i>Note: Percentages may not add to 100.0 percent due to rounding</i>            |                            |  |              |                    |              |                         |

| <b>Geographic Distribution of Small Farm Loans</b>                               |                            |  |              |                    |              |                    |
|--|----------------------------|--|--------------|--------------------|--------------|--------------------|
| <b>Assessment Area: 2020 Eastern IN Non MSA</b>                                  |                            |  |              |                    |              |                    |
|  | <b>Tract Income Levels</b> | <b>Bank &amp; Demographic Comparison</b> |              |                    |              |                    |
|  |                            | <b>Count Bank</b>                        |              | <b>Dollar Bank</b> |              | <b>Total Farms</b> |
|  |                            | <b>#</b>                                 | <b>%</b>     | <b>\$ 000s</b>     | <b>\$ %</b>  | <b>%</b>           |
| <b>Small Farm</b>  | Low                        | 0  | 0.0          | 0                  | 0.0          | 0.0                |
|  | Moderate                   | 0  | 0.0          | 0                  | 0.0          | 0.2                |
|  | Middle                     | 13                                       | 100.0        | 2,698              | 100.0        | 87.6               |
|  | Upper                      | 0  | 0.0          | 0                  | 0.0          | 12.2               |
|  | Unknown                    | 0  | 0.0          | 0                  | 0.0          | 0.0                |
|  | <b>Total</b>               | <b>13</b>                                | <b>100.0</b> | <b>2,698</b>       | <b>100.0</b> | <b>100.0</b>       |
| 2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS |                            |  |              |                    |              |                    |
| <i>Note: Percentages may not add to 100.0 percent due to rounding</i>            |                            |  |              |                    |              |                    |

| <b>Small Business Lending By Revenue &amp; Loan Size</b>                         |                                  |                               |           |              |              |                          |      |              |
|--|----------------------------------|-------------------------------|-----------|--------------|--------------|--------------------------|------|--------------|
| <b>Assessment Area: 2020 Eastern IN Non MSA</b>                                  |                                  |                               |           |              |              |                          |      |              |
| Product Type   |                                  | Bank & Demographic Comparison |           |              |              |                          |      |              |
|  |                                  | 2020                          |           | 2020         |              | Total<br>Businesses<br>% |      |              |
| #  | %                                | \$ 000s                       | \$ %      | Count Bank   |              |                          |      |              |
|  |                                  |                               |           | Dollar Bank  |              |                          |      |              |
| Small Business   | Revenue                          | \$1 Million or Less           | 13        | 86.7         | 880          | 36.3                     | 90.4 |              |
|  |                                  | Over \$1 Million              | 2         | 13.3         | 1,545        | 63.7                     |      | 8.0          |
|  |                                  | Unknown                       | 0         | 0.0          | 0            | 0.0                      |      | 1.6          |
|  |                                  | <b>Total</b>                  | <b>15</b> | <b>100.0</b> | <b>2,425</b> | <b>100.0</b>             |      | <b>100.0</b> |
|  | Loan Size                        | \$100,000 or Less             | 11        | 73.3         | 482          | 19.9                     |      |              |
|  |                                  | \$100,001 - \$250,000         | 2         | 13.3         | 398          | 16.4                     |      |              |
|  |                                  | \$250,001 - \$1 Million       | 2         | 13.3         | 1,545        | 63.7                     |      |              |
|  |                                  | <b>Total</b>                  | <b>15</b> | <b>100.0</b> | <b>2,425</b> | <b>100.0</b>             |      |              |
|  | Loan Size & Rev \$1 Mill or Less | \$100,000 or Less             | 11        | 84.6         | 482          | 54.8                     |      |              |
|  |                                  | \$100,001 - \$250,000         | 2         | 15.4         | 398          | 45.2                     |      |              |
|  |                                  | \$250,001 - \$1 Million       | 0         | 0.0          | 0            | 0.0                      |      |              |
|  |                                  | <b>Total</b>                  | <b>13</b> | <b>100.0</b> | <b>880</b>   | <b>100.0</b>             |      |              |
| Originations & Purchases   |                                  |                               |           |              |              |                          |      |              |
| 2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS |                                  |                               |           |              |              |                          |      |              |
| <i>Note: Percentages may not add to 100.0 percent due to rounding</i>            |                                  |                               |           |              |              |                          |      |              |

| <b>Small Farm Lending By Revenue &amp; Loan Size</b>                             |                                  |                               |           |              |              |                  |      |              |
|--|----------------------------------|-------------------------------|-----------|--------------|--------------|------------------|------|--------------|
| <b>Assessment Area: 2020 Eastern IN Non MSA</b>                                  |                                  |                               |           |              |              |                  |      |              |
| Product Type   |                                  | Bank & Demographic Comparison |           |              |              |                  |      |              |
|  |                                  | 2020                          |           | 2020         |              | Total Farms<br>% |      |              |
| #  | %                                | \$ 000s                       | \$ %      | Count Bank   |              |                  |      |              |
|  |                                  |                               |           | Dollar Bank  |              |                  |      |              |
| Small Farm   | Revenue                          | \$1 Million or Less           | 13        | 100.0        | 2,698        | 100.0            | 98.6 |              |
|  |                                  | Over \$1 Million              | 0         | 0.0          | 0            | 0.0              |      | 1.2          |
|  |                                  | Unknown                       | 0         | 0.0          | 0            | 0.0              |      | 0.2          |
|  |                                  | <b>Total</b>                  | <b>13</b> | <b>100.0</b> | <b>2,698</b> | <b>100.0</b>     |      | <b>100.0</b> |
|  | Loan Size                        | \$100,000 or Less             | 5         | 38.5         | 229          | 8.5              |      |              |
|  |                                  | \$100,001 - \$250,000         | 2         | 15.4         | 395          | 14.6             |      |              |
|  |                                  | \$250,001 - \$500,000         | 6         | 46.2         | 2,074        | 76.9             |      |              |
|  |                                  | <b>Total</b>                  | <b>13</b> | <b>100.0</b> | <b>2,698</b> | <b>100.0</b>     |      |              |
|  | Loan Size & Rev \$1 Mill or Less | \$100,000 or Less             | 5         | 38.5         | 229          | 8.5              |      |              |
|  |                                  | \$100,001 - \$250,000         | 2         | 15.4         | 395          | 14.6             |      |              |
|  |                                  | \$250,001 - \$500,000         | 6         | 46.2         | 2,074        | 76.9             |      |              |
|  |                                  | <b>Total</b>                  | <b>13</b> | <b>100.0</b> | <b>2,698</b> | <b>100.0</b>     |      |              |
| Originations & Purchases   |                                  |                               |           |              |              |                  |      |              |
| 2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS |                                  |                               |           |              |              |                  |      |              |
| <i>Note: Percentages may not add to 100.0 percent due to rounding</i>            |                                  |                               |           |              |              |                  |      |              |

| <b>Geographic Distribution of Small Business Loans</b> |                     |                               |            |             |            |                  |
|--|---------------------|-------------------------------|------------|-------------|------------|------------------|
| <b>Assessment Area: 2020 Kokomo, IN MSA 29020</b>      |                     |                               |            |             |            |                  |
|  | Tract Income Levels | Bank & Demographic Comparison |            |             |            |                  |
|  |                     | Count Bank                    |            | Dollar Bank |            | Total Businesses |
|  |                     | #                             | %          | \$ 000s     | \$ %       | %                |
| Small Business   | Low                 | 0                             | 0.0        | 0           | 0.0        | 11.0             |
|  | Moderate            | 0                             | 0.0        | 0           | 0.0        | 18.9             |
|  | Middle              | 0                             | 0.0        | 0           | 0.0        | 45.9             |
|  | Upper               | 0                             | 0.0        | 0           | 0.0        | 24.1             |
|  | Unknown             | 0                             | 0.0        | 0           | 0.0        | 0.0              |
|  | <b>Total</b>        | <b>0</b>                      | <b>0.0</b> | <b>0</b>    | <b>0.0</b> | <b>100.0</b>     |

2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

| <b>Geographic Distribution of Small Farm Loans</b> |                     |                               |            |             |            |              |
|--|---------------------|-------------------------------|------------|-------------|------------|--------------|
| <b>Assessment Area: 2020 Kokomo, IN MSA 29020</b>  |                     |                               |            |             |            |              |
|  | Tract Income Levels | Bank & Demographic Comparison |            |             |            |              |
|  |                     | Count Bank                    |            | Dollar Bank |            | Total Farms  |
|  |                     | #                             | %          | \$ 000s     | \$ %       | %            |
| Small Farm   | Low                 | 0                             | 0.0        | 0           | 0.0        | 1.5          |
|  | Moderate            | 0                             | 0.0        | 0           | 0.0        | 1.5          |
|  | Middle              | 0                             | 0.0        | 0           | 0.0        | 51.5         |
|  | Upper               | 0                             | 0.0        | 0           | 0.0        | 45.4         |
|  | Unknown             | 0                             | 0.0        | 0           | 0.0        | 0.0          |
|  | <b>Total</b>        | <b>0</b>                      | <b>0.0</b> | <b>0</b>    | <b>0.0</b> | <b>100.0</b> |

2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

| <b>Small Business Lending By Revenue &amp; Loan Size</b> |                                  |                               |          |             |          |                          |              |  |
|--|----------------------------------|-------------------------------|----------|-------------|----------|--------------------------|--------------|--|
| <b>Assessment Area: 2020 Kokomo, IN MSA 29020</b>        |                                  |                               |          |             |          |                          |              |  |
| Product Type   |                                  | Bank & Demographic Comparison |          |             |          |                          |              |  |
|  |                                  | 2020                          |          | 2020        |          | Total<br>Businesses<br>% |              |  |
| #  | %                                | \$ 000s                       | \$ %     | Count Bank  |          |                          |              |  |
|  |                                  |                               |          | Dollar Bank |          |                          |              |  |
| Small Business   | Revenue                          | \$1 Million or Less           | 0        | 0.0         | 0        | 0.0                      | 92.1         |  |
|  |                                  | Over \$1 Million              | 0        | 0.0         | 0        | 0.0                      | 6.7          |  |
|  |                                  | Unknown                       | 0        | 0.0         | 0        | 0.0                      | 1.1          |  |
|  |                                  | <b>Total</b>                  | <b>0</b> | <b>0.0</b>  | <b>0</b> | <b>0.0</b>               | <b>100.0</b> |  |
|  | Loan Size                        | \$100,000 or Less             | 0        | 0.0         | 0        | 0.0                      |              |  |
|  |                                  | \$100,001 - \$250,000         | 0        | 0.0         | 0        | 0.0                      |              |  |
|  |                                  | \$250,001 - \$1 Million       | 0        | 0.0         | 0        | 0.0                      |              |  |
|  |                                  | <b>Total</b>                  | <b>0</b> | <b>0.0</b>  | <b>0</b> | <b>0.0</b>               |              |  |
|  | Loan Size & Rev \$1 Mill or Less | \$100,000 or Less             | 0        | 0.0         | 0        | 0.0                      |              |  |
|  |                                  | \$100,001 - \$250,000         | 0        | 0.0         | 0        | 0.0                      |              |  |
|  |                                  | \$250,001 - \$1 Million       | 0        | 0.0         | 0        | 0.0                      |              |  |
|  |                                  | <b>Total</b>                  | <b>0</b> | <b>0.0</b>  | <b>0</b> | <b>0.0</b>               |              |  |

Originations & Purchases  
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

| <b>Small Farm Lending By Revenue &amp; Loan Size</b> |                                  |                               |          |             |          |                  |              |  |
|--|----------------------------------|-------------------------------|----------|-------------|----------|------------------|--------------|--|
| <b>Assessment Area: 2020 Kokomo, IN MSA 29020</b>    |                                  |                               |          |             |          |                  |              |  |
| Product Type   |                                  | Bank & Demographic Comparison |          |             |          |                  |              |  |
|  |                                  | 2020                          |          | 2020        |          | Total Farms<br>% |              |  |
| #  | %                                | \$ 000s                       | \$ %     | Count Bank  |          |                  |              |  |
|  |                                  |                               |          | Dollar Bank |          |                  |              |  |
| Small Farm   | Revenue                          | \$1 Million or Less           | 0        | 0.0         | 0        | 0.0              | 99.2         |  |
|  |                                  | Over \$1 Million              | 0        | 0.0         | 0        | 0.0              | 0.8          |  |
|  |                                  | Unknown                       | 0        | 0.0         | 0        | 0.0              | 0.0          |  |
|  |                                  | <b>Total</b>                  | <b>0</b> | <b>0.0</b>  | <b>0</b> | <b>0.0</b>       | <b>100.0</b> |  |
|  | Loan Size                        | \$100,000 or Less             | 0        | 0.0         | 0        | 0.0              |              |  |
|  |                                  | \$100,001 - \$250,000         | 0        | 0.0         | 0        | 0.0              |              |  |
|  |                                  | \$250,001 - \$500,000         | 0        | 0.0         | 0        | 0.0              |              |  |
|  |                                  | <b>Total</b>                  | <b>0</b> | <b>0.0</b>  | <b>0</b> | <b>0.0</b>       |              |  |
|  | Loan Size & Rev \$1 Mill or Less | \$100,000 or Less             | 0        | 0.0         | 0        | 0.0              |              |  |
|  |                                  | \$100,001 - \$250,000         | 0        | 0.0         | 0        | 0.0              |              |  |
|  |                                  | \$250,001 - \$500,000         | 0        | 0.0         | 0        | 0.0              |              |  |
|  |                                  | <b>Total</b>                  | <b>0</b> | <b>0.0</b>  | <b>0</b> | <b>0.0</b>       |              |  |

Originations & Purchases  
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

| <b>Geographic Distribution of Small Business Loans</b> |                     |  |            |                    |            |                         |
|--|---------------------|--|------------|--------------------|------------|-------------------------|
| <b>Assessment Area: 2020 Western IN Non MSA</b>        |                     |  |            |                    |            |                         |
|  | Tract Income Levels | <b>Bank &amp; Demographic Comparison</b> |            |                    |            |                         |
|  |                     | <b>2020</b>                              |            |                    |            |                         |
|  |                     | <b>Count Bank</b>                        |            | <b>Dollar Bank</b> |            | <b>Total Businesses</b> |
|  |                     | #  | %          | \$ 000s            | \$ %       | %                       |
| Small Business   | Low                 | 0  | 0.0        | 0                  | 0.0        | 0.0                     |
|  | Moderate            | 0  | 0.0        | 0                  | 0.0        | 12.9                    |
|  | Middle              | 0  | 0.0        | 0                  | 0.0        | 87.1                    |
|  | Upper               | 0  | 0.0        | 0                  | 0.0        | 0.0                     |
|  | Unknown             | 0  | 0.0        | 0                  | 0.0        | 0.0                     |
|  | <b>Total</b>        | <b>0</b>                                 | <b>0.0</b> | <b>0</b>           | <b>0.0</b> | <b>100.0</b>            |

2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

| <b>Geographic Distribution of Small Farm Loans</b> |                     |  |            |                    |            |                    |
|--|---------------------|--|------------|--------------------|------------|--------------------|
| <b>Assessment Area: 2020 Western IN Non MSA</b>    |                     |  |            |                    |            |                    |
|  | Tract Income Levels | <b>Bank &amp; Demographic Comparison</b> |            |                    |            |                    |
|  |                     | <b>2020</b>                              |            |                    |            |                    |
|  |                     | <b>Count Bank</b>                        |            | <b>Dollar Bank</b> |            | <b>Total Farms</b> |
|  |                     | #  | %          | \$ 000s            | \$ %       | %                  |
| Small Farm   | Low                 | 0  | 0.0        | 0                  | 0.0        | 0.0                |
|  | Moderate            | 0  | 0.0        | 0                  | 0.0        | 0.7                |
|  | Middle              | 0  | 0.0        | 0                  | 0.0        | 99.3               |
|  | Upper               | 0  | 0.0        | 0                  | 0.0        | 0.0                |
|  | Unknown             | 0  | 0.0        | 0                  | 0.0        | 0.0                |
|  | <b>Total</b>        | <b>0</b>                                 | <b>0.0</b> | <b>0</b>           | <b>0.0</b> | <b>100.0</b>       |

2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

| <b>Small Business Lending By Revenue &amp; Loan Size</b> |                                  |                               |             |            |          |                  |              |
|--|----------------------------------|-------------------------------|-------------|------------|----------|------------------|--------------|
| <b>Assessment Area: 2020 Western IN Non MSA</b>          |                                  |                               |             |            |          |                  |              |
| Product Type   |                                  | Bank & Demographic Comparison |             |            |          | Total Businesses |              |
|  |                                  | 2020                          |             | 2020       |          |                  |              |
| Revenue  | Loan Size                        | Count Bank                    | Dollar Bank |            |          |                  |              |
|  |                                  | #                             | %           | \$ 000s    | \$ %     | %                |              |
| Small Business   | Revenue                          | \$1 Million or Less           | 0           | 0.0        | 0        | 0.0              | 91.7         |
|  |                                  | Over \$1 Million              | 0           | 0.0        | 0        | 0.0              | 6.7          |
|  |                                  | Unknown                       | 0           | 0.0        | 0        | 0.0              | 1.6          |
|  |                                  | <b>Total</b>                  | <b>0</b>    | <b>0.0</b> | <b>0</b> | <b>0.0</b>       | <b>100.0</b> |
| Small Business   | Loan Size                        | \$100,000 or Less             | 0           | 0.0        | 0        | 0.0              |              |
|  |                                  | \$100,001 - \$250,000         | 0           | 0.0        | 0        | 0.0              |              |
|  |                                  | \$250,001 - \$1 Million       | 0           | 0.0        | 0        | 0.0              |              |
|  |                                  | <b>Total</b>                  | <b>0</b>    | <b>0.0</b> | <b>0</b> | <b>0.0</b>       |              |
| Small Business   | Loan Size & Rev \$1 Mill or Less | \$100,000 or Less             | 0           | 0.0        | 0        | 0.0              |              |
|  |                                  | \$100,001 - \$250,000         | 0           | 0.0        | 0        | 0.0              |              |
|  |                                  | \$250,001 - \$1 Million       | 0           | 0.0        | 0        | 0.0              |              |
|  |                                  | <b>Total</b>                  | <b>0</b>    | <b>0.0</b> | <b>0</b> | <b>0.0</b>       |              |

Originations & Purchases  
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

| <b>Small Farm Lending By Revenue &amp; Loan Size</b> |                                  |                               |             |            |          |             |              |
|--|----------------------------------|-------------------------------|-------------|------------|----------|-------------|--------------|
| <b>Assessment Area: 2020 Western IN Non MSA</b>      |                                  |                               |             |            |          |             |              |
| Product Type   |                                  | Bank & Demographic Comparison |             |            |          | Total Farms |              |
|  |                                  | 2020                          |             | 2020       |          |             |              |
| Revenue  | Loan Size                        | Count Bank                    | Dollar Bank |            |          |             |              |
|  |                                  | #                             | %           | \$ 000s    | \$ %     | %           |              |
| Small Farm   | Revenue                          | \$1 Million or Less           | 0           | 0.0        | 0        | 0.0         | 97.8         |
|  |                                  | Over \$1 Million              | 0           | 0.0        | 0        | 0.0         | 1.5          |
|  |                                  | Unknown                       | 0           | 0.0        | 0        | 0.0         | 0.7          |
|  |                                  | <b>Total</b>                  | <b>0</b>    | <b>0.0</b> | <b>0</b> | <b>0.0</b>  | <b>100.0</b> |
| Small Farm   | Loan Size                        | \$100,000 or Less             | 0           | 0.0        | 0        | 0.0         |              |
|  |                                  | \$100,001 - \$250,000         | 0           | 0.0        | 0        | 0.0         |              |
|  |                                  | \$250,001 - \$500,000         | 0           | 0.0        | 0        | 0.0         |              |
|  |                                  | <b>Total</b>                  | <b>0</b>    | <b>0.0</b> | <b>0</b> | <b>0.0</b>  |              |
| Small Farm   | Loan Size & Rev \$1 Mill or Less | \$100,000 or Less             | 0           | 0.0        | 0        | 0.0         |              |
|  |                                  | \$100,001 - \$250,000         | 0           | 0.0        | 0        | 0.0         |              |
|  |                                  | \$250,001 - \$500,000         | 0           | 0.0        | 0        | 0.0         |              |
|  |                                  | <b>Total</b>                  | <b>0</b>    | <b>0.0</b> | <b>0</b> | <b>0.0</b>  |              |

Originations & Purchases  
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*



| <b>Geographic Distribution of Small Business Loans</b> |                            |  |            |                    |             |                         |
|--|----------------------------|--|------------|--------------------|-------------|-------------------------|
| <b>Assessment Area: 2020 OH Non MSA</b>                |                            |  |            |                    |             |                         |
|  | <b>Tract Income Levels</b> | <b>Bank &amp; Demographic Comparison</b> |            |                    |             |                         |
|  |                            | <b>Count Bank</b>                        |            | <b>Dollar Bank</b> |             | <b>Total Businesses</b> |
|  |                            | <b>#</b>                                 | <b>%</b>   | <b>\$ 000s</b>     | <b>\$ %</b> | <b>%</b>                |
| Small Business   | Low                        | 0  | 0.0        | 0                  | 0.0         | 0.0                     |
|  | Moderate                   | 0  | 0.0        | 0                  | 0.0         | 0.0                     |
|  | Middle                     | 0  | 0.0        | 0                  | 0.0         | 85.9                    |
|  | Upper                      | 0  | 0.0        | 0                  | 0.0         | 14.1                    |
|  | Unknown                    | 0  | 0.0        | 0                  | 0.0         | 0.0                     |
|  | <b>Total</b>               | <b>0</b>                                 | <b>0.0</b> | <b>0</b>           | <b>0.0</b>  | <b>100.0</b>            |

2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

| <b>Geographic Distribution of Small Farm Loans</b> |                            |  |            |                    |             |                    |
|--|----------------------------|--|------------|--------------------|-------------|--------------------|
| <b>Assessment Area: 2020 OH Non MSA</b>            |                            |  |            |                    |             |                    |
|  | <b>Tract Income Levels</b> | <b>Bank &amp; Demographic Comparison</b> |            |                    |             |                    |
|  |                            | <b>Count Bank</b>                        |            | <b>Dollar Bank</b> |             | <b>Total Farms</b> |
|  |                            | <b>#</b>                                 | <b>%</b>   | <b>\$ 000s</b>     | <b>\$ %</b> | <b>%</b>           |
| Small Farm   | Low                        | 0  | 0.0        | 0                  | 0.0         | 0.0                |
|  | Moderate                   | 0  | 0.0        | 0                  | 0.0         | 0.0                |
|  | Middle                     | 0  | 0.0        | 0                  | 0.0         | 76.8               |
|  | Upper                      | 0  | 0.0        | 0                  | 0.0         | 23.2               |
|  | Unknown                    | 0  | 0.0        | 0                  | 0.0         | 0.0                |
|  | <b>Total</b>               | <b>0</b>                                 | <b>0.0</b> | <b>0</b>           | <b>0.0</b>  | <b>100.0</b>       |

2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

| <b>Small Business Lending By Revenue &amp; Loan Size</b> |                                  |                               |          |             |          |                  |              |
|--|----------------------------------|-------------------------------|----------|-------------|----------|------------------|--------------|
| <b>Assessment Area: 2020 OH Non MSA</b>                  |                                  |                               |          |             |          |                  |              |
| Product Type   |                                  | Bank & Demographic Comparison |          |             |          |                  |              |
|  |                                  | Count Bank                    |          | Dollar Bank |          | Total Businesses |              |
|  |                                  | #                             | %        | \$ 000s     | \$ %     |                  | %            |
| Small Business   | Revenue                          | \$1 Million or Less           | 0        | 0.0         | 0        | 0.0              | 88.9         |
|  |                                  | Over \$1 Million              | 0        | 0.0         | 0        | 0.0              | 9.5          |
|  |                                  | Unknown                       | 0        | 0.0         | 0        | 0.0              | 1.6          |
|  |                                  | <b>Total</b>                  | <b>0</b> | <b>0.0</b>  | <b>0</b> | <b>0.0</b>       | <b>100.0</b> |
|  | Loan Size                        | \$100,000 or Less             | 0        | 0.0         | 0        | 0.0              |              |
|  |                                  | \$100,001 - \$250,000         | 0        | 0.0         | 0        | 0.0              |              |
|  |                                  | \$250,001 - \$1 Million       | 0        | 0.0         | 0        | 0.0              |              |
|  |                                  | <b>Total</b>                  | <b>0</b> | <b>0.0</b>  | <b>0</b> | <b>0.0</b>       |              |
|  | Loan Size & Rev \$1 Mill or Less | \$100,000 or Less             | 0        | 0.0         | 0        | 0.0              |              |
|  |                                  | \$100,001 - \$250,000         | 0        | 0.0         | 0        | 0.0              |              |
|  |                                  | \$250,001 - \$1 Million       | 0        | 0.0         | 0        | 0.0              |              |
|  |                                  | <b>Total</b>                  | <b>0</b> | <b>0.0</b>  | <b>0</b> | <b>0.0</b>       |              |

Originations & Purchases  
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

| <b>Small Farm Lending By Revenue &amp; Loan Size</b> |                                  |                               |          |             |          |             |              |
|--|----------------------------------|-------------------------------|----------|-------------|----------|-------------|--------------|
| <b>Assessment Area: 2020 OH Non MSA</b>              |                                  |                               |          |             |          |             |              |
| Product Type   |                                  | Bank & Demographic Comparison |          |             |          |             |              |
|  |                                  | Count Bank                    |          | Dollar Bank |          | Total Farms |              |
|  |                                  | #                             | %        | \$ 000s     | \$ %     |             | %            |
| Small Farm   | Revenue                          | \$1 Million or Less           | 0        | 0.0         | 0        | 0.0         | 99.4         |
|  |                                  | Over \$1 Million              | 0        | 0.0         | 0        | 0.0         | 0.6          |
|  |                                  | Unknown                       | 0        | 0.0         | 0        | 0.0         | 0.0          |
|  |                                  | <b>Total</b>                  | <b>0</b> | <b>0.0</b>  | <b>0</b> | <b>0.0</b>  | <b>100.0</b> |
|  | Loan Size                        | \$100,000 or Less             | 0        | 0.0         | 0        | 0.0         |              |
|  |                                  | \$100,001 - \$250,000         | 0        | 0.0         | 0        | 0.0         |              |
|  |                                  | \$250,001 - \$500,000         | 0        | 0.0         | 0        | 0.0         |              |
|  |                                  | <b>Total</b>                  | <b>0</b> | <b>0.0</b>  | <b>0</b> | <b>0.0</b>  |              |
|  | Loan Size & Rev \$1 Mill or Less | \$100,000 or Less             | 0        | 0.0         | 0        | 0.0         |              |
|  |                                  | \$100,001 - \$250,000         | 0        | 0.0         | 0        | 0.0         |              |
|  |                                  | \$250,001 - \$500,000         | 0        | 0.0         | 0        | 0.0         |              |
|  |                                  | <b>Total</b>                  | <b>0</b> | <b>0.0</b>  | <b>0</b> | <b>0.0</b>  |              |

Originations & Purchases  
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

**APPENDIX D – Scope of Examination**

| SCOPE OF EXAMINATION   |  |                  |   |
|--|--|------------------|---|
| <b>TIME PERIOD REVIEWED</b>  | HMDA-Reportable Lending January 1, 2019 – December 31, 2020<br>Small Business Lending November 1, 2020 – October 31, 2021<br>Small Farm Lending November 1, 2020 – October 31, 2021<br>Community Development Activities January 8, 2019 – January 31, 2022 |                  |   |
| <b>FINANCIAL INSTITUTION</b>   |  |                  | <b>PRODUCTS REVIEWED</b>  |
| First Bank of Berne  |  |                  | HMDA-Reportable Loans<br>Sample of Small Business Loans<br>Sample of Small Farm Loans |
| <b>AFFILIATE(S)</b>  | <b>AFFILIATE RELATIONSHIP</b>  |                  | <b>PRODUCTS REVIEWED</b>  |
| None   | N/A  |                  | N/A   |
| LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION                                       |  |                  |   |
| ASSESSMENT AREA  | TYPE OF EXAMINATION  | BRANCHES VISITED | OTHER INFORMATION   |
| Indiana<br><br>Eastern Indiana Non-MSA<br>Kokomo MSA #29020<br>Western Indiana Non-MSA | Full Scope<br>Full Scope<br>Limited Scope  | N/A              | N/A   |
| Ohio<br><br>Ohio Non-MSA   | Full Scope   | N/A              | N/A   |

## APPENDIX E – Glossary

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

**Affordability ratio:** To determine housing affordability, the affordability ratio is calculated by dividing median household income by median housing value. This ratio allows the comparison of housing affordability across assessment areas and/or communities. An area with a high ratio generally has more affordable housing than an area with a low ratio.

**Aggregate lending:** The number of loans originated and purchased by all lenders subject to reporting requirements as a percentage of the aggregate number of loans originated and purchased by all lenders in the MSA/assessment area.

**American Community Survey Data (ACS):** The American Community Survey (ACS) data is based on a nationwide survey designed to provide local communities with reliable and timely demographic, social, economic, and housing data each year. The Census Bureau first released data for geographies of all sizes in 2010. This data is known as the “five-year estimate data.” The five-year estimate data is used by the FFIEC as the base file for data used in conjunction with consumer compliance and CRA examinations.<sup>1</sup>

**Area Median Income (AMI):** AMI means –

1. The median family income for the MSA, if a person or geography is located in an MSA, or for the metropolitan division, if a person or geography is located in an MSA that has been subdivided into metropolitan divisions; or
2. The statewide nonmetropolitan median family income if a person or geography is located outside an MSA.

**Assessment area:** Assessment area means a geographic area delineated in accordance with section 228.41

**Automated teller machine (ATM):** An automated teller machine means an automated, unstaffed banking facility owned or operated by, or operated exclusively for, the bank at which deposits are received, cash dispersed or money lent.

**Bank:** Bank means a state member as that term is defined in section 3(d)(2) of the Federal Deposit Insurance Act (12 USC 1813(d)(2)), except as provided in section 228.11(c)(3), and includes an uninsured state branch (other than a limited branch) of a foreign bank described in section

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<sup>1</sup> Source: FFIEC press release dated October 19, 2011.

228.11(c)(2).

**Branch:** Branch refers to a staffed banking facility approved as a branch, whether shared or unshared, including, for example, a mini-branch in a grocery store or a branch operated in conjunction with any other local business or nonprofit organization.

**Census tract:** Small subdivisions 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. They 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.

**Combined Statistical Area (CSAs):** Adjacent metropolitan statistical areas/metropolitan divisions (MSA/MDs) and micropolitan statistical areas may be combined into larger Combined Statistical Areas based on social and economic ties as well as commuting patterns. The ties used as the basis for CSAs are not as strong as the ties used to support MSA/MD and micropolitan statistical area designations; however, they do bind the larger area together and may be particularly useful for regional planning authorities and the private sector. Under Regulation BB, assessment areas may be presented under a Combined Statistical Area heading; however, all analysis is conducted on the basis of median income figures for MSA/MDs and the applicable state-wide non metropolitan median income figure.

**Community Development:** The financial supervisory agencies have adopted the following definition for community development:

1. Affordable housing, including for multi-family housing, for low- and moderate-income households;
2. Community services tailored to meet the needs of low- and moderate-income individuals;
3. 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 million or less; or
4. Activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definitions of community development. Activities that revitalize or stabilize:

- 1) Low- or moderate-income geographies;
- 2) Designated disaster areas; or
- 3) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation and Office of the Comptroller of the Currency based on:

- a. Rates of poverty, unemployment or population loss; or
- b. Population size, density and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density and dispersion if they help to meet essential community services including the needs of low- and moderate-income individuals.

**Community Development Loan:** A community development loan means a loan that:

- 1) Has as its primary purpose community development; and
- 2) Except in the case of a wholesale or limited purpose bank –
  - a. Has not been reported or collected by the bank or an affiliate for consideration in the bank’s assessment as a home mortgage, small business, small farm, or consumer loan, unless it is a multi-family housing loan (as described in the regulation implementing the Home Mortgage Disclosure Act); and
  - b. Benefits the bank’s assessment area(s) or a broader statewide or regional area that includes the bank’s assessment area(s).

**Community Development Service:** A community development service means a service that:

- 1) Has as its primary purpose community development; and
- 2) Is related to the provision of financial services.

**Consumer loan:** 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 of loans: motor vehicle, credit card, other consumer secured loan, includes loans for home improvement purposes not secured by a dwelling, and other consumer unsecured loan, includes loans for home improvement purposes not secured.

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

**Fair market rent:** Fair market rents (FMRs) are gross rent estimates. They include the shelter rent plus the cost of all tenant-paid utilities, except telephones, cable or satellite television service, and internet service. HUD sets FMRs to assure that a sufficient supply of rental housing is available to their program participants. To accomplish this objective, FMRs must be both high enough to permit a selection of units and neighborhoods and low enough to serve as many low-income families as possible. The level at which FMRs are set is expressed as a percentile point within the rent distribution of standard-quality rental housing units. The current definition used is the 40th

percentile rent, the dollar amount below which 40 percent of the standard-quality rental housing units are rented. The 40th percentile rent is drawn from the distribution of rents of all units occupied by recent movers (renter households who moved to their present residence within the past 15 months). HUD is required to ensure that FMRs exclude non-market rental housing in their computation. Therefore, HUD excludes all units falling below a specified rent level determined from public housing rents in HUD's program databases as likely to be either assisted housing or otherwise at a below-market rent, and units less than two years old.

**Full review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and amount of qualified investments) and qualitative factors (for example, innovativeness, complexity and responsiveness).

**Geography:** A census tract delineated by the U.S. Bureau of the Census in the most recent decennial census.

**Home Mortgage Disclosure Act:** The statute that requires certain mortgage lenders that do business or have banking offices in metropolitan statistical areas to file annual summary reports of their mortgage lending activity. The reports include data such as the race, gender and income of the applicant(s) and the disposition of the application(s) (for example, approved, denied, and withdrawn).

**Home mortgage loans:** Are defined in conformance with the definitions of home mortgage activity under the Home Mortgage Disclosure Act and include closed end mortgage loans secured by a dwelling and open-end lines of credit secured by a dwelling. This includes loans for home purchase, refinancing and loans for multi-family housing. It does not include loans for home improvement purposes that are not secured by a dwelling.

**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.

**Income Level:** Income level means:

- 1) Low-income – an 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 census tract;
- 2) Moderate-income – an 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 census tract;
- 3) Middle-income – an 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 census tract; and
- 4) Upper-income – an individual income that is at least 120 percent of the area median

income, or a median family income that is at least 120 percent in the case of a census tract.

*Additional Guidance: .12(m) Income Level: The median family income levels (MFI) for census tracts are calculated using the income data from the United States Census Bureau's American Community Survey and geographic definitions from the Office of Management and Budget (OMB) and are updated approximately every five years (.12(m) Income Level).*

**Limited-purpose bank:** This term refers to a bank that offers only a narrow product line such as credit card or motor vehicle loans to a regional or broader market and for which a designation as a limited-purpose bank is in effect, in accordance with section 228.25(b).

**Limited review:** Performance under the Lending, Investment, and Services test is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, amount of investments and branch office distribution).

**Loan location:** Under this definition, a loan is located as follows:

- 1) Consumer loan is located in the census tract where the borrower resides;
- 2) Home mortgage loan is located in the census tract where the property to which the loan relates is located;
- 3) Small business and small farm loan is located in the census tract where the main business facility or farm is located or where the loan proceeds have been applied as indicated by the borrower.

**Loan production office (LPO):** This term refers to a staffed facility, other than a branch, that is open to the public and that provides lending-related services, such as loan information and applications.

**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 MA/assessment area.

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development (HUD) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

**Metropolitan Area:** 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 single core population of at



least 2.5 million may be divided into MDs. A metropolitan statistical area that crosses into two or more bordering states is called a multistate metropolitan statistical area.

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

**Nonmetropolitan area:** This term refers to any area that is not located in a metropolitan statistical area or metropolitan division. Micropolitan statistical areas are included in the definition of a nonmetropolitan area; a micropolitan statistical area has an urban core population of at least 10,000 but less than 50,000.

**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:** This term refers to any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

**Rated area:** This term refers to a state or multistate metropolitan area. For institutions with domestic branch offices in one state only, the institution's CRA rating is the state's rating. If the institution maintains domestic branch offices in more than one state, the institution will receive a rating for each state in which those branch offices are located. If the institution maintains domestic branch offices in at least two states in a multistate metropolitan statistical area, the institution will receive a rating for the multistate metropolitan area.

**Small Bank:** This term refers to a bank that as of December 31 of either of the prior two calendar years, had assets of less than \$1.252 billion. Intermediate small bank means a small bank with assets of at least \$313 million as of December 31 of both of the prior two calendar years and less than \$1.252 billion as of December 31 of either of the prior two calendar years.

*Annual Adjustment: The dollar figures in paragraph (u)(1) of this section shall be adjusted annually and published by the Board, based on the year-to-year change in the average of the Consumer Price Index for Urban Wage Earners and Clerical Workers, not seasonally adjusted, for each 12-month period ending in November, with rounding to the nearest million.*

**Small Business Loan:** This term refers to a loan that is included in "loans to small businesses" as defined in the instructions for preparation of the Consolidated Report of Condition and Income. The loans have original amounts of \$1 million or less and are either secured nonfarm, nonresidential properties or are classified as commercial and industrial loans.

**Small Farm Loan:** This term refers to a loan that is included in "loans to small farms" as defined in the instructions for preparation of the Consolidated Report of Condition and Income. These loans have original amounts of \$500 thousand or less and are either secured by farmland, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

**Wholesale Bank:** This term refers to a bank that is not in the business of extending home mortgage, small business, small farm or consumer loans to retail customers, and for which a designation as a wholesale bank is in effect, in accordance with section 228.25(b).