

PUBLIC DISCLOSURE

February 22, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Andover Bank
RSSD #27614

19 Public Square
P.O. Box 1300
Andover, Ohio 44003

Federal Reserve Bank of Cleveland

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

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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INSTITUTION'S CRA RATING: Outstanding
The Lending Test is rated: Satisfactory
The Community Development Test is rated: Outstanding

The major factors and criteria contributing to this rating include:

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

SCOPE OF EXAMINATION

The Federal Financial Institutions Examination Council's Interagency Examination procedures for Intermediate Small Institutions was utilized to evaluate The Andover Bank's (Andover) Community Reinvestment Act (CRA) performance under Regulation BB. The evaluation considered CRA performance context, including Andover's asset size, financial condition, business strategy, and market competition, as well as the demographics, economic characteristics, and credit needs of Andover's assessment area.

The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 amended The Home Mortgage Disclosure Act (HMDA) to add new data points effective January 1, 2018, and included the reporting of HELOCs for certain institutions, the addition of new loan purposes, and changes to the definitions of some existing fields. Due to the breadth of these changes, HMDA-reportable loans originated or purchased on or after January 1, 2018, are separated from loans made before that date.

Andover's CRA performance was evaluated based on HMDA lending data for the period of January 1, 2017 through December 31, 2019 and home equity lines of credit (HELOCs) and consumer lending data for the period of January 1, 2019 through December 31, 2019. HMDA-reportable loans are comprised of home purchase, refinance, and home improvement loans. Non-reportable consumer loans are comprised of motor vehicle and other unsecured loans. HELOCs were only evaluated in Nonmetropolitan Ohio, the only assessment area with enough volume to conduct a meaningful analysis. Due to limited loan volumes in the Erie and Cleveland Metropolitan Statistical Areas (MSAs), HMDA loans were combined and consumer loans were combined in order to conduct meaningful analyses. Commercial and agricultural loans were not

considered in this evaluation.

As part of this evaluation, community development activities were reviewed for the period between July 11, 2017 through February 22, 2021. Community development activities are comprised of community development loans, investments, and services.

The following table shows the volume and distribution of loans originated within Andover's assessment area during the evaluation period:

Loan Type	Number of Loans	Dollar Amount of Loans (000s)
Motor Vehicle	53	\$1,038
Other-Secured	18	\$318
Other-Unsecured	39	\$187
Home Improvement	147	\$7,073
Home Purchase	202	\$20,478
Multi-family Housing	2	\$336
Refinancing	471	\$42,220
Other Purpose Closed-end	58	\$2,408
Home Equity	122	\$6,935
Total	1,112	\$80,993

Based on the total loan volume by number and dollar amounts available, HMDA-reportable loans received the greatest weight, followed by HELOCs, and non-reportable consumer loans.

As a full-service interstate bank, the scope of this evaluation includes a full-scope evaluation of at least one assessment area in each state where Andover has deposit-taking facilities. The determination of which assessment areas received full-scope versus limited-scope evaluations was based on the following criteria: the volume of lending by number of loans and dollar amount as a percentage of overall and statewide lending activity, deposit market share, number of branches, percentage of deposits, percentage of low- and moderate-income geographies, volume of community development activity, and other non-financial considerations. Lastly, assessment areas not subject to full-scope reviews at the previous evaluation were considered in order to ensure in-depth analyses of all assessment areas with deposit-taking facilities receive full-scope evaluations at some time.

For the purpose of this evaluation, Andover has the following three CRA delineated assessment areas:

- Nonmetropolitan Ohio – Full-scope evaluation
 - Consists of the entirety of Ashtabula County
- Cleveland-Elyria, OH MSA #17460 (Cleveland MSA) – Limited-scope evaluation
 - Consists of portions of Geauga and Lake counties (excludes Cuyahoga, Lorain, and Medina counties)
- Erie, PA MSA #21500 (Erie MSA) – Full-scope evaluation
 - Consists of a portion of Erie County and a portion of Crawford County¹

Nonmetropolitan Ohio was given the greatest weight in the evaluation, as it contained the largest

¹ Crawford County is in Nonmetropolitan Pennsylvania, which is contiguous to Erie County.

percentage of branches and originated the largest amount of loans (by number and dollar amount), followed by the Erie and Cleveland MSAs, respectively. Borrower distribution received more weight than geographic distribution in this evaluation, primarily because the percentage of families by family income is greater than the percentage of low- and moderate-income geographies across the assessment area. A detailed description of each full-scope assessment area is presented in subsequent sections of this performance evaluation.

Aggregated lending data, which is comprised of lending activity for all other lenders reporting home mortgage loans under HMDA in the respective assessment areas, was used as a comparison in evaluating Andover's lending performance in 2017, 2018, and 2019.

To better understand assessment area community development and credit needs, several sources were used, including publicly accessible data and information submitted by the bank. Two community contact interviews were conducted. The first interview was conducted with a representative from an affordable housing agency and the second interview was conducted with a representative from an economic development agency. Both contacts operate inside Andover's assessment areas. These individuals have expertise in their respective fields and are familiar with the economic, social, and demographic characteristics and community development opportunities in the assessment area. Information obtained from these interviews helped establish context for the communities in which Andover operates and gather information on its performance. More detailed information obtained from these contacts is included in the Description of the Institution's Operations section for each full-scope assessment area.

DESCRIPTION OF INSTITUTION

Andover is an interstate community bank and a banking subsidiary of Andover Bancorp, Inc. Both entities are headquartered in Andover, Ohio. Andover has total assets of \$427.2 million as of December 31, 2019. In addition to its main office in Andover, Ohio (Ashtabula County), the bank has nine branch offices and ten ATMs. The branches and ATMs in Ohio are in Madison, Ashtabula, Conneaut, Geneva, Jefferson, and Austinburg. Andover also operates branches and ATMs in Pennsylvania in Albion, Edinboro and Millcreek. There have been no branch openings or closings since the last CRA evaluation. As a full-service retail bank, Andover offers traditional bank products, such as deposit accounts, residential mortgages, consumer loans, and commercial loans.

The following table displays the loan portfolio composition as of December 31, 2019. Based on lending volume, loans secured by one-to-four family dwellings comprise the majority of Andover's originations.

COMPOSITION OF LOAN PORTFOLIO						
Loan Type	12/31/2019		12/31/2018		12/31/2017	
	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent
Construction and Development	1,887	1.0%	2,019	1.2%	1,305	0.7%
Secured by One- to Four- Family Dwellings	147,660	81.8%	139,122	80.3%	139,762	79.9%
Other Real Estate: Farmland	1,183	0.7%	1,406	0.8%	1,602	0.9%
Other Real Estate: Multifamily	863	0.5%	944	0.5%	915	0.5%
Other Real Estate: Nonfarm nonresidential	23,330	12.9%	24,444	14.1%	25,277	14.5%
Commercial and Industrial	1,393	0.8%	1,681	1.0%	2,093	1.2%
Loans to Individuals	4,119	2.3%	3,715	2.1%	3,921	2.2%
Agricultural Loans	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>\$180,435</i>	<i>100.00%</i>	<i>\$173,331</i>	<i>100.00%</i>	<i>\$174,875</i>	<i>100.00%</i>

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

Andover was rated “Satisfactory” under the CRA at its previous evaluation conducted July 10, 2017. The lending and community development tests were each rated “Satisfactory.”

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

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

Lending Test

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

Loan-to-Deposit Ratio

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

The Andover Bank Loan-to-Deposit Ratios						
AS OF DATE	ANDOVER BK	CONNEAUT SVG BK	CORTLAND SVG & BKG CO	MARQUETT E SVG BK	MIDDLEFIELD BKG CO	CUSTOM PEER
December 31, 2019	60.2	75.3	83.9	70.0	95.5	81.2
September 30, 2019	59.7	75.5	83.2	73.2	96.0	82.0
June 30, 2019	59.3	74.2	83.0	74.6	94.2	81.5
March 31, 2019	57.9	75.8	83.9	75.0	95.8	82.6
December 31, 2018	62.0	74.8	84.6	77.7	96.7	83.4
September 30, 2018	60.3	75.4	85.3	76.1	95.1	83.0
June 30, 2018	63.1	73.8	83.3	75.8	100.2	83.3
March 31, 2018	60.9	74.2	81.0	76.2	97.7	82.3
December 31, 2017	59.6	72.6	82.9	77.9	104.0	84.3
September 30, 2017	57.7	73.5	77.9	77.3	97.3	81.5
June 30, 2017	56.8	75.3	76.8	76.3	102.2	82.6
Quarterly Loan-to-Deposit Ratio Average Since the Previous Evaluation	59.8	74.6	82.3	75.5	97.7	82.5

During this period, Andover’s LTD ratio averaged 59.8%, which was below the custom peer group average of 82.5%. According to bank management, Andover’s LTD ratios are below peer because Andover is primarily a retail lender that takes in a significant amount of deposits and primarily originates mortgage loans. Andover’s LTD ratio is impacted when mortgage loans are paid off at scheduled maturity dates or when borrowers prepay their loans or refinance with another lender. Further, Andover sells a large portion of its residential portfolio on the secondary market, which further lowers its LTD ratio. Given these factors, Andover’s LTD ratio is considered reasonable.

Assessment Area Concentration

Andover’s mortgage lending in 2017 was analyzed to determine the volume of lending inside and outside Andover’s assessment area. Of Andover’s total mortgage lending, 94.5% by volume and 92.7% by total dollar amount were made inside the assessment area.

Lending Inside and Outside the Assessment Area-2017

Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	83	96.5	\$4,760	96.8	3	3.5	\$156	3.2
Home Purchase - Conventional	67	91.8	\$5,748	89.9	6	8.2	\$643	10.1
Multi-Family Housing	0	0.0	\$0	0.0	1	100.0	\$116	100.0
Refinancing	106	95.5	\$8,874	93.4	5	4.5	\$622	6.6
Total HMDA related	256	94.5	\$19,382	92.7	15	5.5	\$1,537	7.3
TOTAL LOANS	256	94.5	\$19,382	92.7	15	5.5	\$1,537	7.3

Note: Affiliate loans not included

For the lending period of 2018-2019, Andover’s mortgage lending and consumer lending was analyzed to determine the volume of lending inside and outside Andover’s assessment area. Of Andover’s total lending, 93.9%, by volume and 88.9% of total dollar amount were made inside the assessment area. The dollar amount inside the assessment area was lower than in previous

years due to a \$2.2 million multi-family loan originated outside the assessment area. Without this loan, Andover’s lending inside the assessment area by dollar amount would be 91.8%.

Lending Inside and Outside the Assessment Area-2018-2019

Loan Types	Inside				Outside			
	#	%	\$ (000s)	%	#	%	\$ (000s)	%
Motor Vehicle	53	100.0	\$1,038	100.0	0	0.0	\$0	0.0
Other - Secured	18	90.0	\$318	57.7	2	10.0	\$233	42.3
Other - Unsecured	39	97.5	\$187	90.3	1	2.5	\$20	9.7
Total Consumer related	110	97.3	\$1,543	85.9	3	2.7	\$253	14.1
Home Improvement	64	94.1	\$2,313	96.3	4	5.9	\$89	3.7
Home Purchase - Conventional	135	91.2	\$14,730	88.6	13	8.8	\$1,886	11.4
Multi-Family Housing	2	66.7	\$336	13.2	1	33.3	\$2,200	86.8
Other Purpose Closed-End	58	95.1	\$2,408	89.6	3	4.9	\$279	10.4
Refinancing	365	94.6	\$33,346	94.8	21	5.4	\$1,844	5.2
Total HMDA related	624	93.7	\$53,133	89.4	42	6.3	\$6,298	10.6
Home Equity	122	91.7	\$6,935	85.9	11	8.3	\$1,136	14.1
Total Non-HMDA	122	91.7	\$6,935	85.9	11	8.3	\$1,136	14.1
TOTAL LOANS	856	93.9	\$61,611	88.9	56	6.1	\$7,687	11.1

Note: Affiliate loans not included

Therefore, a substantial majority of Andover’s loans by both volume and dollar amount were made inside its assessment area.

Borrower and Geographic Distribution

Andover has a reasonable penetration among individuals of different income (including low- and moderate-income) levels. The geographic distribution of loans reflects a reasonable penetration throughout the combined assessment area. Refer to the assessment area summaries for additional details.

Response to Complaints

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

Community Development Test

Andover’s performance relative to the community development test is rated “Outstanding” based on an excellent responsiveness to community development needs, particularly to area businesses impacted by the COVID-19 emergency, by providing community development loans, qualified donations, and community development services. Since the previous evaluation, Andover increased its community development lending, qualified donations, and community development services. This demonstrates Andover’s responsiveness to addressing identified needs for assistance to small businesses and low- and moderate-income individuals and families, financial literacy, and community revitalization.

Community Development Lending

Andover originated or renewed 99 community development loans totaling \$12.7 million, which represents a 7.6% increase by dollar amount since the previous evaluation. The following table shows the total number of community development loans by purpose, number and dollar amount.

Purpose of CD Loan	#	\$
Revitalization/Stabilization	90	\$8,669,820
Services to LMI Individuals	9	\$4,030,000
Total	99	\$12,699,820

The majority of community development loans originated during this evaluation period were Paycheck Protection Program (PPP) loans made in response to the COVID-19 emergency to help local businesses remain open and retain their workforce. From April 1, 2020 through March 1, 2021, Andover originated 85 PPP loans totaling \$4.4 million that benefited area businesses located in low- and moderate-income geographies across the assessment area. PPP loans represent 85.9% of Andover’s total community development lending by volume and 34.5% by dollar amount. The remaining community development loans originated or renewed during the evaluation period helped to revitalize/stabilize moderate-income geographies and provide community organizations with needed funding to continue providing services targeted to low- and moderate-income individuals and families.

The largest concentration of community development loans by dollar amount was in Ohio, accounting for 98.1% of bank-wide community development lending. The majority of community development lending in Ohio occurred in Nonmetropolitan Ohio, with 64.8% of the community development lending in Ohio. The remaining 1.9% of bank-wide community development lending occurred in Pennsylvania. Lastly, consideration was given to several qualified community development loans that benefited counties within Ohio and Pennsylvania, but were outside Andover’s delineated assessment areas.

Community Development Investments

All of Andover’s qualified investments were in the form of donations. Andover made 61 donations totaling \$113,027 to 34 organizations, which represents a 136.0% increase by dollar amount since the previous evaluation. The following table shows the total number of qualified donations by purpose, number and dollar amount.

Purpose of Qualified Donation	#	\$
Services to LMI Individuals	43	\$97,832
Economic Development	18	\$15,195
Total	61	\$113,027

The majority of the contributions supported organizations that provide a multitude of community services targeted to low- and moderate-income people. The largest concentration of qualified donations by dollar amount was in Ohio with 89.7% of total donations. The majority of qualified donations in Ohio benefited Nonmetropolitan Ohio, accounting for 99.8% of qualified donations in Ohio. The remaining 10.3% of qualified donations benefited Pennsylvania.

Community Development Services

Bank officers and employees worked with a variety of community service organizations throughout its assessment area during the evaluation period. Bank employees primarily provided financial literacy training to low- and moderate-income school-age children. In addition, a significant portion of Andover's leadership provided financial expertise to 39 organizations with a community development purpose by serving as board and committee members.

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 OHIO

CRA RATING for State of Ohio:² **Outstanding**

The Lending Test is rated: **Satisfactory**

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

The major factors and criteria contributing to this rating include:

- The distribution of loans to borrowers reflects a reasonable penetration among individuals of different income levels (including low- and moderate-income);
- The geographic distribution of loans reflects a reasonable dispersion throughout the assessment area; and,
- The bank's community development performance demonstrates an excellent responsiveness to the community development needs of the assessment area, considering the bank's capacity and the need and availability of such opportunities in the bank's assessment area.

SCOPE OF EXAMINATION

A full-scope review was conducted for Nonmetropolitan Ohio and a limited-scope review was conducted for the Cleveland-Elyria MSA. The time period and products evaluated for these assessment areas are consistent with the scope discussed in the Scope of Examination section of this report.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE STATE OF OHIO

Lending activity in Ohio accounted for 77.2% of Andover's total lending activity, specifically 74.4% of HMDA-reportable loans, 96.7% of HELOCs, and 78.2% of non-reportable consumer loans. As of June 30, 2019, Andover ranked 66th among 213 insured institutions in Ohio with a deposit market share of 0.1% and deposits in Ohio account for 86.5% of Andover's total deposits.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF OHIO

Lending Test

Andover's performance relative to the lending test in Ohio is rated "Satisfactory."

Borrower and Geographic Distribution

Overall, the penetration of loans among borrowers of different income levels is reasonable and the geographic distribution of loans is reasonable, with a low level of lending gaps in Nonmetropolitan

²For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Ohio.

Community Development Test

Andover’s performance relative to the community development test in Ohio is rated “Outstanding.” Andover’s community development performance demonstrates an excellent responsiveness to community development needs of its assessment areas in Ohio through community development loans, qualified donations, and community development services.

Community Development Loans

Andover originated or renewed 93 community development loans totaling \$12.5 million in Ohio, which represents a 7.1% increase by dollar amount since the previous evaluation. The following table shows the total number of community development loans by purpose, number and dollar amount.

Purpose of CD Loan	#	\$
Revitalization/Stabilization	84	\$8,429,094
Services to LMI Individuals	9	\$4,030,000
Total	93	\$12,459,094
<i>*totals include all CD loans the benefit Ohio</i>		

The majority of community development loans originated during this evaluation period were Paycheck Protection Program (PPP) loans made in response to the COVID-19 emergency to help local businesses remain open and retain their workforce. Between April 1, 2020 through March 1, 2021, Andover originated 77 PPP loans totaling \$4.2 million that benefited area businesses located in low- and moderate-income geographies across Andover’s delineated assessment area in Ohio. PPP loans represent 87.1% of Andover’s total community development lending by volume and 34.2% by dollar amount in Ohio. The remaining community development loans originated or renewed during the evaluation period helped to revitalize/stabilize moderate-income geographies and provide community organizations with needed funding to continue providing services targeted to low- and moderate-income individuals and families.

The majority of community development lending in Ohio occurred in Nonmetropolitan Ohio with 64.8% of community development lending, while 2.2% of community development lending occurred in the Cleveland MSA.

Lastly, consideration was given to five community development loans that benefited counties in Ohio, but outside Andover’s delineated assessment area. Andover originated a construction loan totaling \$4.0 million to a school district in southern Ohio to build a new administration building. The school is located in a moderate-income geography and helps to enhance the school’s ability to serve the community. The remaining four community development loans were PPP loans totaling \$118,622 that helped one business in Cleveland and three businesses in Painesville in moderate-income geographies retain their workforce during the COVID-19 crisis. These community development loans are considered to be particularly responsive because they benefit area businesses and low- and moderate-income individuals impacted by the COVID-19 pandemic.

Community Developments Investments

Andover made 46 donations totaling \$101,342 to 27 organizations, which represents a 120% increase by dollar amount since the previous evaluation. The following table shows the total number of qualified donations by purpose, number and dollar amount.

Purpose of Qualified Donation	#	\$
Services to LMI Individuals	32	\$87,097
Economic Development	14	\$14,245
Total	46	\$101,342

The majority of donations supported organizations that provide a multitude of community services targeted to low- and moderate-income people. The majority of qualified donations benefited Nonmetropolitan Ohio, accounting for 99.8% of qualified donations in Ohio.

Community Development Services

Andover's directors, officers, and staff members provided their financial expertise to the community by engaging in activities that promoted or facilitated services for low- and moderate-income individuals and economic development in Ohio. Andover's leadership provided financial expertise to 39 organizations with a community development purpose, with the majority of financial expertise being provided to 23 organizations in Nonmetropolitan Ohio. In addition, Andover's staff participated in financial literacy training to local schools, totaling 118 hours of service.

NONMETROPOLITAN OHIO
(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NONMETROPOLITAN OHIO

The Nonmetropolitan Ohio assessment area consists of the entirety of Ashtabula County, which is located in the northeastern corner of Ohio bordering Lake Erie and Pennsylvania. Nonmetropolitan Ohio is comprised of nine moderate-income tracts, 14 middle-income tracts, two upper-income tracts, and one unknown-income tract.³ No middle-income census tracts were designated as underserved and/or distressed in 2017, 2018, or 2019.

Andover operates six branch offices with cash-only ATMs in Nonmetropolitan Ohio. The main office is in Andover and located in a middle-income tract. Andover has a branch in Ashtabula and a branch in Conneaut in moderate-income tracts. Andover also has a branch in Geneva and a branch in Jefferson in middle-income tracts and a branch in Austinburg in an upper-income tract. Andover did not close or open any branches in Nonmetropolitan Ohio during the evaluation period.

As of June 30, 2019, the FDIC Deposit Market Share Report ranks Andover 13th among 47 institutions operating in the assessment area with a 27.7% market share. The Huntington National Bank holds a 27.1% market share and KeyBank National Association holds a 16.5% market share. This leaves a residual 28.7% market share area available to the remaining seven financial institutions in the assessment area. Deposits in Nonmetropolitan Ohio account for 80.3% of Andover's total deposits.

The 2019 HMDA peer market data indicates that Andover ranked second out of 156 HMDA reporters in the assessment area, originating 247 loans. First-ranked Huntington National Bank originated 404 loans and seventh-ranked KeyBank National Association originated 91 loans.

Community Contacts

An interview was conducted with a community contact to provide supplemental information regarding the assessment area. The contact was with a representative from an economic development agency. According to the contact, manufacturing, transportation, and healthcare are key industries in Ashtabula County and considered essential during the COVID-19 crisis. The contact indicated that the small businesses in the retail, hospitality, and food service sectors were significantly impacted by the crisis. The contact stated that many of the area's large financial institutions do not have established relationships with local business in the community, thereby creating a need for more lending to area business. However, the contact indicated community banks seem more willing than large banks to extend credit to local businesses and specifically mentioned Andover as being responsive to the credit needs of area businesses. Given the continued impact of the pandemic, the contact believes the relationship between community banks and area businesses is going to be even more important to the ongoing viability of the area's economy.

The contact also discussed the need to change the perception of the manufacturing industry in

³ The income data used by the U.S. Census Bureau and the Office of Management and Budget (OMB) to calculate geographic income designations did not change in 2017, 2018, or 2019.

order to attract the next-generation workforce to seek careers in manufacturing. With increasing retirement rates for baby boomers, manufacturing is expected to face a shortage of skilled workers in the next several years. The contact’s organization is leading an initiative to attract and train millennials for manufacturing careers.

Population Characteristics

Between 2010 and 2019, Nonmetropolitan Ohio experienced a population loss of about 4.4% as compared to Ohio, which experienced a population gain of about 1.3% during that same period of time.

Population Change					
Area	2010 Population	2015 Population	Percent Change Between 2010 and 2015	2019 Population	Percent Change Between 2015 and 2019
Ashtabula County, Ohio	101,497	99,777	-1.7%	97,241	-2.5%
Ohio	11,536,504	11,575,977	0.3%	11,689,100	1.0%

According to 2015 U.S. Census data, the total population in the assessment area was 99,777, of which 79,659 (79.8%) are 16 years old or older. The labor force totaled 44,418 (55.8%) and 8.8% of the labor force was unemployed. The labor force is defined as total persons 16 years and older, both employed and unemployed, that are actively seeking work. This translates into a potential labor workforce where the majority of the population are of the working- and consumer-age category with increased contribution to economic growth. Additionally, 34.8% of the population live in moderate-income census tracts, providing a sufficient customer base for financial institutions to reasonably serve.

The city of Ashtabula is the most populous city in the county with a population of 18,017. Conneaut is the second most populous city in the county with a population of 12,530. Of the population in Ashtabula County, only 9.2% have attained a bachelor’s degree and only 4.9% of the population have a master’s degree or higher. According to the Federal Reserve’s 2019 Report on the Economic Well-Being of U.S. Households,⁴ a college education is widely recognized as a path to higher income and greater economic well-being.

Income Characteristics

The 2015 median family income (MFI) of \$50,577 was notably lower than Ohio’s at \$62,817. According to the data from the U.S. Department of Housing and Urban Development (HUD), the 2019 MFI in Nonmetropolitan Ohio increased to \$61,000 and the MFI increased 5.9% overall from 2017 through 2019.

Borrower Income Levels Ohio State Nonmetropolitan										
FFIEC Estimated Median Family Income			Low		Moderate		Middle		Upper	
Year	\$	% Change	0	-	50%	-	80%	-	120%	-
2017	\$57,600		0	-	\$28,799	\$28,800	\$46,079	\$46,080	\$69,119	\$69,120
2018	\$61,400	6.2%	0	-	\$30,699	\$30,700	\$49,119	\$49,120	\$73,679	\$73,680
2019	\$61,000	-0.7%	0	-	\$30,499	\$30,500	\$48,799	\$48,800	\$73,199	\$73,200

Of the 25,206 families in the assessment area, 43.5% are designated as low- and moderate-income,

4 <https://www.federalreserve.gov/publications/2020-economic-well-being-of-us-households-in-2019-higher-education.htm>

with 14.4% living below the poverty level. Overall, a higher percentage of families in the assessment area are low- and moderate-income and live below the poverty level compared to 11.5% of families living below the poverty level within Ohio. Of the 38,890 households in the assessment area, 2.7% receive public assistance. According to the Federal Reserve Bank of St. Louis,⁵ Ashtabula County had 17,092 individuals on the Supplemental Nutritional Assistance Program (SNAP) in 2018, which is approximately 17.5% of population.

As shown in the table below, in 2019 the poverty rate for Ashtabula County was 18.7%, which was higher than Ohio’s rate at 13.0% and the national rate at 12.3%. Ashtabula County’s poverty rates also exceeded Ohio’s and the nation’s rates in 2017 and 2018.

Poverty Rates			
Assessment Area: Nonmetropolitan OH			
Area	Years		
	2017	2018	2019
Ashtabula County, Ohio	19.3	17.4	18.7
Ohio	13.9	13.8	13.0
National	13.4	13.1	12.3

The city of Ashtabula ranked eighth in Ohio with a child poverty rate at 50.5%, and Ashtabula County ranked seventh in Ohio with a child poverty rate of 30.5%.⁶ Child poverty rates are important to understand because these rates are intertwined with adult poverty. Children living in poverty are not just experiencing financial instability, but also are more likely to attend under-resourced schools, reside in neighborhoods subject to chronic disinvestment, experience adverse health outcomes, and become involved in the child welfare and criminal justice systems.⁷

Housing Characteristics

According to the 2015 U.S. Census data, there are 45,907 housing units in the assessment area. The rate of owner-occupied housing in moderate-income census tracts is 49.1%. Over a third (35.5%) of the units are rentals and 15.4% are vacant in moderate-income tracts. With the overall percentage of owner-occupied units in the assessment area at 60.3%, this would indicate there are opportunities for Andover to originate home purchase and home improvement loans. From an income perspective, 34.9% of the housing units and 33.2% of families are in moderate-income tracts.

The 2015 U.S. Census data shows the median age of housing stock in moderate-income tracts was 61 years old, which is the same as the median age of stock in the assessment area. Between 2010 and 2015, the median housing value (MHV) decreased in Ashtabula County by 10.5% compared to Ohio’s decrease in MHV of 4.8%. The affordability ratio is derived by dividing the median household income by the MHV. The higher the affordability ratio, the more affordable a home is considered. Between 2010 and 2015, housing became more affordable in Ashtabula and Ohio and housing affordability in Ashtabula remained comparable to housing affordability in Ohio.

⁵ SNAP Benefits Recipients in Ashtabula County, OH (CBR39007OHA647NCEN) | FRED | St. Louis Fed

⁶ “Every Ohio city and county ranked for poverty, child poverty: census estimates” Every Ohio city and county ranked for poverty, child poverty: census estimates - cleveland.com

⁷ The Basic Facts About Children in Poverty - Center for American Progress

Conversely, the median gross rent (MGR) increased by 3.5% in the assessment area compared to 7.7% across Ohio. Lastly, according to U.S. Census data, 47.9% of renters (11,189) in the assessment area have rent costs greater than 30.0% of their monthly income.

The following table presents housing characteristics from the U.S. Census data between 2010 and 2015 in Ashtabula County and Ohio. With the drop in median housing values, higher affordability ratios, and a modest increase in median gross rents, this would indicate more opportunities for home ownership in the assessment area.

County	Housing Costs Change							
	Median Housing Value		Percent Change	2010 Affordability Ratio	2015 Affordability Ratio	Median Gross Rent		Percent Change
	2010	2015				2010	2015	
Ashtabula County, Ohio	\$ 118,500	\$ 106,000	-10.5%	35.6	38.3	\$ 607	\$ 628	3.5%
Ohio	\$ 136,400	\$ 129,900	-4.8%	34.7	38.1	\$ 678	\$ 730	7.7%

Building permits are a leading indicator of future activity in the construction sector. As indicated in the table below, building permits increased by 21.1% between 2018 and 2019 in Ashtabula County and exceeded both state and national trends.

Area	Building Permits					
	2017	2018	% Change between 2017 and 2018	2019	% Change between 2018 and 2019	
Ashtabula County	102	114	11.8%	138	21.1%	
Ohio	23,917	24,221	1.3%	23,047	-4.8%	
United States	1,281,977	1,328,827	3.7%	1,386,048	4.3%	

The overall increase in the number of permits could indicate an increasing demand for home purchase loans during the evaluation period.

Labor, Employment and Economic Characteristics

Unemployment rates in the assessment area have consistently exceeded the state and national unemployment rates, as shown in the table below.

Unemployment Rates			
Assessment Area: Nonmetropolitan Ohio			
Area	Years - Annualized		
	2017	2018	2019
Ashtabula County, Ohio	5.9	5.2	4.8
Ohio	5.0	4.5	4.1
National	4.4	3.9	3.7

Not Seasonally Adjusted

While the unemployment rates in Ashtabula County are higher than in Ohio and the nation, unemployment rates consistently decreased in Ashtabula County in 2017, 2018, and 2019. Also, the rate of decrease was greater in Ashtabula County than the rate of decrease experienced at the state and national levels over this period.

Ashtabula County is centrally located in terms of access points with multiple highways, a regional

airport, local ports on Lake Erie, and multiple railroads, making it strategically viable for industry.⁸ In addition, Ashtabula County's proximity to major metropolitan areas further enhances its strategic access for industries that rely on distribution and transportation.

According to the Ohio Office of Research,⁹ the Nonmetropolitan Ohio assessment area is most impacted by the industries of goods producing; manufacturing; trade, transportation, and utilities; and education and health services. Major employers in the assessment area include Cristal Global, General Aluminum Mfg. Co., University Hospitals, Masco/Kraftmaid Cabinetry, and Ashtabula Area City Schools. The average weekly wage for the private sector is \$706, which indicates that employed persons could afford the median rent of \$628 for the assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NONMETROPOLITAN OHIO

Lending Test

The lending test performance in Nonmetropolitan Ohio is reasonable. Details of Andover's HMDA and consumer lending can be found in the tables in Appendix D.

Lending to Borrowers of Different Income Levels

Andover's lending penetration among borrowers of different income (including low- and moderate-income) levels in Nonmetropolitan Ohio is considered reasonable. Factors such as housing values and poverty levels impacted Andover's ability to originate certain types of loans.

HMDA Lending

During the evaluation period, Andover made 557 HMDA loans comprised of 158 home purchase (28.4%), 293 refinance (52.6%), and 106 home improvement (19.0%) loans. Andover's performance was compared to the percentage of families by family income (proxy) and the aggregate of all lenders. Andover's borrower distribution of HMDA loans is reasonable.

Refinance Lending

Andover originated 142 refinance loans totaling \$12.3 million in 2019. Andover made 11 (7.7%) refinance loans to low-income borrowers, which was below the percentage of families at 23.9% and slightly below the aggregate of all lenders. While bank lending was below proxy, Andover is keeping pace with the aggregate of all lenders; therefore, Andover's lending to low-income borrowers is reasonable.

Andover originated 26 (19.9%) refinance loans to moderate-income borrowers, which was slightly below the percentage of families at 18.3% and the aggregate of all lenders at 19.4%. Therefore,

⁸ www.ashtabulagrowth.com/strategic-location

⁹ www.development.oh.gov/reports_countytrends_map

the borrower distribution of refinance loans to moderate-income borrowers is reasonable.

Andover originated 37 (26.1%) refinance loans to middle-income borrowers compared to proxy at 22.5% and the aggregate of all lenders at 25.1%. Andover originated 68 (47.9%) refinance loans to upper-income borrowers compared to proxy at 34.1% and the aggregate of all lenders at 33.1%.

Andover made 87 refinance loans totaling \$7.3 million in 2018. Andover made five (5.7%) refinance loans to low-income borrowers, which was substantially below the percentage of families at 23.9% and below the aggregate of all lenders at 9.8%. It is likely falling housing values impacted Andover's ability to originate refinance loans, as well as the percentage of population that is living in poverty; therefore, the borrower distribution of home purchase loans to low-income borrowers is reasonable.

Andover originated 17 refinance loans (19.5%) to moderate-income borrowers, which was slightly below the percentage of families at 20.0% and slightly below the aggregate of all lenders at 23.3%. Therefore, the borrower distribution of refinance loans to moderate-income borrowers is reasonable.

Andover originated 32 loans (24.1%) to middle-income borrowers compared to proxy at 22.5% and the aggregate of all lenders at 25.1%. Andover originated 44 loans (50.6%) to upper-income borrowers compared to proxy at 33.6% and the aggregate of all lenders at 35.4%.

Andover made 64 refinance loans totaling \$5.0 million in 2017 and originated one refinance loan (1.6%) to a borrower with unknown income. Andover made six (9.4%) refinance loans to low-income borrowers, which was below the percentage of families at 23.9% and substantially above the aggregate of all lenders at 6.3%. Therefore, the borrower distribution of refinance loans to low-income borrowers is reasonable.

Andover originated ten refinance loans (15.6%) to moderate-income borrowers, which was slightly below the percentage of families at 20.0% and the aggregate of all lenders at 18.4%. Therefore, the borrower distribution of refinance loans to moderate-income borrowers is reasonable.

Andover originated 18 loans (28.1%) to middle-income borrowers compared to proxy at 22.5% and the aggregate of all lenders at 25.1%. Andover originated 29 loans (45.3%) to upper-income borrowers compared to proxy at 33.6% and the aggregate of all lenders at 26.3%.

Overall, Andover's refinance lending performance was below the percentage of families and the aggregate of all lenders; therefore, the borrower distribution of refinance lending is reasonable.

Home Purchase Lending

Andover made 58 home purchase loans totaling \$6.2 million in 2019. Andover made three (5.2%) home purchase loans to low-income borrowers, which was substantially below the percentage of families at 23.9%) and below the aggregate of all lenders at 8.9%. It is likely that poverty levels impacted Andover's ability to originate home purchase loans.; therefore, the distribution of home purchase loans to low-income borrowers is poor.

Andover made five (8.6%) home purchase loans to moderate-income borrowers, which was below the percentage of families at 19.9% and the aggregate of all lenders at 23.5%. Given Andover's performance compared to proxy and the aggregate of all lenders, the borrower distribution of home purchase loans to moderate-income borrowers is poor.

Andover originated 21 home purchase loans to middle-income borrowers. This represents 36.2% of home purchase loans compared to the percentage of families at 22.5%. Andover made 29 home purchase loans to upper-income borrowers. This represents 50.0% of home purchase loans compared to the percentage of families at 34.1%.

Andover made 45 home purchase loans totaling \$4.9 million in 2018. Andover made two (4.4%) home purchase loans to low-income borrowers, which was substantially below the percentage of families at 23.9% and below the aggregate of all lenders at 8.7%. However, in the assessment area, 47.0% of low-income families are spending more than 30.0% of their income on rent, which may impact their ability to save for a home; therefore, the distribution of home purchase loans to low-income borrowers is poor.

Andover originated nine home purchase loans (20.0%) to moderate-income borrowers, which was comparable to the percentage of families at 20.0% and slightly below the aggregate of all lenders at 24.8%. Therefore, the borrower distribution of home purchase loans to moderate-income borrowers is reasonable.

Andover originated eight loans (17.8%) to middle-income borrowers compared to proxy at 22.5% and aggregate of all lenders at 21.9%. Andover originated 26 loans (57.8%) to upper-income borrowers compared to proxy of 33.6% and the aggregate of all lenders at 26.3%.

Andover made 55 home purchase loans totaling \$4.4 million in 2017. Andover made four (7.3%) home purchase loans to low-income borrowers, which was below the percentage of families at 23.9% and slightly below the aggregate of all lenders at 8.4%. It is likely that higher poverty and unemployment rates negatively impacted Andover's ability to originate home purchase loans to low-income borrowers; therefore, the borrower distribution of home purchase loans to low-income borrowers is reasonable.

Andover originated ten home purchase loans (18.2%) to moderate-income borrowers, which was slightly below the percentage of families at 20.0% and the aggregate of all lenders at 24.4%. Therefore, the borrower distribution of home purchase loans to moderate-income borrowers is reasonable.

Andover originated 19 loans (34.5%) to middle-income borrowers compared to proxy at 22.5% and the aggregate of all lenders at 24.3%. Andover originated 22 loans (40.0%) to upper-income borrowers compared to proxy of 33.6% and the aggregate of all lenders at 26.3%.

Overall, Andover's home purchase loan performance was below the percentage of families and the aggregate of all lenders; therefore, the borrower distribution of home purchase lending is reasonable.

Home Improvement Lending

Andover originated 21 home improvement loans totaling \$650,000 in 2019. Andover made two home improvement loans (9.5%) to low-income borrowers, which was below the percentage of families at 23.9%; however, Andover's lending to low-income borrowers was substantially above the aggregate of all lenders at 6.3%. The average age of housing stock in the assessment area is 61 years, indicating there is a need for home improvement loans in the assessment area. While Andover's lending was below proxy, it is likely that poverty and falling housing values in the assessment area impacted Andover's ability to originate these loan types. Therefore, considering performance context and Andover's performance compared to the aggregate of all lenders, borrower distribution of home improvement loans to low-income borrowers is excellent.

Andover originated two home improvement loans (9.5%) to moderate-income borrowers, which was below the percentage families at 20.0% and the aggregate of all lenders at 24.3%. Given Andover's weak performance compared to proxy and the aggregate of all lenders, the borrower distribution of home improvement loans to moderate-income borrowers is poor.

Andover originated nine home improvement loans (42.9%) to middle-income borrowers compared to the percentage of families at 22.5% and the aggregate of all lenders at 31.2%. Andover originated eight (38.1%) home improvement loans to upper-income borrowers compared to the percentage of families at 33.6% and the aggregate of all lenders at 37.6%.

Andover originated 27 home improvement loans totaling \$1.1 million in 2018. Andover made two home improvement loans (7.4%) to low-income borrowers, which was below the percentage of families at 23.9% and the aggregate of all lenders at 8.9%. Therefore, the borrower distribution of home improvement loans to low-income borrowers is reasonable.

Andover originated five home improvement loans (18.5%) to moderate-income borrowers, which was below the percentage families at 20.0% and the aggregate of all lenders at 20.3%. Therefore, the borrower distribution of home improvement loans to moderate-income borrowers is reasonable.

Andover originated nine home improvement loans (33.3%) to middle-income borrowers compared to the percentage of families at 22.5% and the aggregate of all lenders at 34.4%. Andover originated 11 (40.7%) home improvement loans to upper-income borrowers compared to the percentage of families at 33.6% and the aggregate of all lenders at 34.4%.

Andover made 58 home improvement loans totaling \$3.2 million in 2017. Andover made five (8.6%) home improvement loans to low-income borrowers, which was below the percentage of families at 23.9%, but substantially above the aggregate of all lenders at 6.5%. While Andover's lending was below proxy, it is likely that poverty and falling housing values in the assessment area impacted Andover's ability to originate these loan types. Therefore, considering performance context and Andover's performance compared to the aggregate of all lenders, borrower distribution of home improvement loans to low-income borrowers is excellent.

Andover originated 12 home improvement loans (20.7%) to moderate-income borrowers, which

was slightly above the percentage of families at 20.0% and the aggregate of all lenders at 19.8%. Therefore, the borrower distribution of home improvement loans to moderate-income borrowers is excellent.

Andover originated 15 loans (25.9%) to middle-income borrowers compared to proxy at 22.5% and the aggregate of all lenders at 24.3%. Andover originated 25 loans (43.1%) to upper-income borrowers compared to proxy at 33.6% and the aggregate of all lenders at 40.1%.

Considering Andover's strong performance compared to the aggregate of lenders and that high poverty rates and falling housing values likely impacted Andover's ability to originate home improvement loans, particularly to low- and moderate-income borrowers, the borrower distribution of home improvement lending is excellent.

Home Equity Lending

Andover originated 107 home equity loans totaling \$6.1 million in 2019. In addition, Andover originated two (1.9%) home equity loans to borrowers of unknown incomes. Andover made nine loans (8.4%) to low-income borrowers, which was below the percentage of families at 20.0%. It is likely that falling housing values and high poverty rates would impact Andover's ability to originate these types of loans. Given Andover's performance compared to the percentage of families, lending to low-income borrowers is reasonable.

Andover originated 23 home equity loans (21.5%) to moderate-income borrowers, which was above the percentage of families at 20.0%. Therefore, Andover's lending to moderate-income borrowers is excellent.

Andover originated 32 home equity loans (29.9%) to middle-income borrowers, compared to proxy at 22.5%. Andover originated 41 home equity loans (38.3%) to upper-income borrowers compared to proxy at 33.6%.

Nearly a third of Andover's home equity loans were originated to low- and moderate-income borrowers, which is significant given the impact of this type of lending, particularly for lower-income borrowers. Therefore, the borrower distribution of home equity lending is excellent.

Consumer Lending

In 2019, Andover originated a total of 68 consumer loans comprised of 40 motor vehicle loans (59.0%) and 28 other-unsecured loans (41.0%). Andover's performance was compared to the percentage of households by household income (proxy). Overall, Andover's borrower distribution of consumer loans is reasonable.

Motor Vehicle Lending

In 2019, Andover originated six motor vehicle loans (15.0%) to low-income borrowers, which was below the percentage of households at 28.1%. Therefore, motor vehicle lending to low-income borrowers is reasonable.

Andover originated eight motor vehicle loans (20.0%) to moderate-income borrowers, which was above the percentage of households at 17.4%. Therefore, motor vehicle lending to moderate-income borrowers is excellent.

Andover originated ten (25.0%) motor vehicle loans to middle-income borrowers compared to the percentage of households at 17.4% and 14 (35.0%) loans to upper-income borrowers compared to proxy at 37.0%.

Andover’s motor vehicle lending to borrowers of different income levels is excellent, considering Andover’s strong performance to moderate-income borrowers. Having access to transportation is essential for improving upward social mobility for lower-income individuals and communities.

Other-Unsecured Lending

In 2019, Andover originated eight (28.6%) other-unsecured loans to low-income borrowers, which was slightly above the percentage of households at 28.1%. Given Andover’s performance compared to proxy, lending to low-income borrowers is excellent.

Andover originated five (17.9%) other-unsecured loans to moderate-income borrowers, which was slightly above the percentage of households at 17.4%. Given Andover’s performance compared to proxy, lending to moderate-income borrowers is excellent.

Andover originated twelve (42.9%) loans to middle-income borrowers compared to proxy at 17.4% and originated two (7.1%) loans to upper-income borrowers (7.1%) compared to households at 37.0%.

Andover’s lending of other-unsecured loans exceeded proxy for low- and moderate-income borrowers. Having access to unsecured, small dollar loans gives low- and moderate-income individuals the ability to have access to smaller amounts of money to pay for items/services they could not otherwise afford at the time. Therefore, Andover’s other-unsecured lending to borrowers of different income levels is excellent.

Geographic Distribution of Loans

Andover’s geographic distribution reflects a reasonable dispersion of loans in Nonmetropolitan Ohio. Andover has a low level of lending gaps.

Tract Income Level	Percentage of Lending Penetration		
	2017	2018	2019
Low	NA	NA	NA
Moderate	88.9%	100.0%	100.0%
Middle	100.0%	100.0%	100.0%
Upper	100.0%	100.0%	100.0%
Unknown	0.0%	0.0%	0.0%
Total	92.3%	96.2%	96.2%

Andover penetrated 100% of its income tracts, including all nine moderate-income tracts in 2018 and 2019.

HMDA Lending

During the evaluation period Andover made 557 HMDA loans comprised of 158 home purchase (28.4%), 293 refinance (52.6%), and 106 home improvement (19.0%) loans. Andover's performance was compared to the percentage of owner-occupied units by tract income (proxy) and compared to the aggregate of all lenders. Andover's geographic distribution of HMDA loans is reasonable.

Refinance Lending

In 2019, Andover originated 43 loans in moderate-income tracts (30.3%) which was above the percentage of owner-occupied units at 28.4% and the aggregate of all lenders at 28.5%. Therefore, Andover's geographic distribution of refinance lending in moderate-income tracts is excellent.

Andover originated 80 refinance loans in middle-income tracts (56.3%), compared to the percentage of owner-occupied units at 65.1% and the aggregate of all lenders at 62.5%. Andover originated 19 refinance loans in upper-income tracts (13.4%) compared to proxy at 6.5% and the aggregate of all lenders at 9.1%.

In 2018, Andover originated 11 refinance loans (12.6%) in moderate-income tracts which was below the percentage of owner-occupied units at 28.4% and the aggregate of all lenders at 27.5%. Given Andover's weak performance compared to proxy and the aggregate of all lenders, Andover's lending in moderate-income tracts is poor.

Andover originated 61 refinance loans (70.1%) in middle-income tracts, compared to the percentage of owner-occupied units at 65.1% and the aggregate of all lenders at 65.2%. Andover originated 15 refinance loans (17.2%) in upper-income tracts, compared to the percentage of owner-occupied units at 6.5% and aggregate of all lenders at 7.3%.

In 2017, Andover originated 16 refinance loans (25.0%) in moderate-income tracts which was slightly below the percentage of owner-occupied units in these tracts at 28.4%; however, Andover's lending was above the aggregate of all lenders at 22.9%. Therefore, Andover's geographic distribution of refinance lending in moderate-income tracts is reasonable.

Andover made 41 loans in middle-income tracts (64.1%), compared to the percentage of owner-occupied units in these tracts at 65.1% and the aggregate of all lenders at 69.3%. Andover originated seven refinance loans (10.9%) in upper-income tracts, compared to the percentage of owner-occupied units at 6.5% and the aggregate of all lenders at 7.8%.

Overall, Andover's refinance lending was slightly below the percentage of owner-occupied units but exceeded the aggregate of all lenders. Therefore, the geographic distribution of refinance lending is reasonable.

Home Purchase Lending

In 2019, Andover made 11 home purchase loans (19.0%) in moderate-income tracts, which was below the percentage of owner-occupied units at 28.4% and the aggregate of all lenders at 27.6%. Andover's geographic distribution of home purchase lending in moderate-income tracts is reasonable.

Andover originated 44 home purchase loans in middle-income tracts (75.9%) compared to the percentage of owner-occupied units at 65.1% and the aggregate of all lenders at 66.1%. Andover originated three home purchase loans in upper-income tracts (5.2%) compared to proxy at 6.5% and the aggregate of all lenders at 6.3%.

In 2018, Andover originated 12 home-purchase loans (26.7%) in moderate-income tracts, which was slightly below the percentage of owner-occupied units at 28.4% and the aggregate of all lenders at 28.7%. Therefore, Andover's geographic distribution of home purchase loans in moderate-income census tracts is reasonable.

Andover originated 29 (64.4%) home purchase loans in middle-income tracts compared to the percentage of owner-occupied units at 65.1% and the aggregate of all lenders at 66.4%. Andover made four loans in upper-income tracts (8.9%) compared to the percentage of owner-occupied units at 6.5% and the aggregate of all lenders at 4.9%.

In 2017, Andover originated 12 home purchase loans (21.8%) in moderate-income tracts, which was below the percentage of owner-occupied units at 28.4% and the aggregate of all lenders at 24.9%. Therefore, Andover's geographic distribution of home purchase loans in moderate-income tracts is reasonable.

Andover originated 37 home purchase loans (67.3%) in middle-income tracts compared to proxy at 65.1% and the aggregate of all lenders at 68.2%. Andover originated six home purchase loans (10.9%) in upper-income tracts compared to proxy at 6.5% and the aggregate of all lenders at 7.0%.

Overall, Andover's home purchase lending was below the percentage of owner-occupied units and aggregate of all lenders in moderate-income tracts. Therefore, Andover's geographic distribution of home purchase loans is reasonable.

Home Improvement Lending

In 2019, Andover originated eight home improvement loans (38.1%) in moderate-income tracts, which was above the percentage of owner-occupied units at 28.4%. In addition, Andover's lending in moderate-income tracts was above the aggregate of all lenders at 32.8%. Given Andover's performance above proxy and the aggregate of all lenders, Andover's home improvement lending in moderate-income tracts is excellent.

Andover originated 10 home improvement loans in middle-income tracts (47.6%) compared to proxy at 65.1% and the aggregate of all lenders at 56.6%. Andover originated three loans in upper-

income tracts (14.3%) compared to proxy at 6.5% and the aggregate of all lenders at 10.6%.

In 2018, Andover originated six home improvement loans (22.2%) in moderate-income tracts, which was below the percentage of owner-occupied units at 28.4% and below the aggregate of all lenders at 29.2%. Therefore, Andover's lending in moderate-income tracts is reasonable.

Andover originated 18 home improvement loans (66.7%) compared to proxy at 65.1% and the aggregate of all lenders at 62.5%. Andover originated three home improvement loans in upper-income tracts (11.1%) compared to proxy at 6.5% and the aggregate of all lenders at 8.3%.

In 2017, Andover originated 13 home improvement loans (22.4%) in moderate-income tracts, which was below the percentage of owner-occupied units at 28.4% and the aggregate of all lenders at 31.3%. Andover's lending in moderate-income census tracts is reasonable.

Andover originated 37 home improvement loans (63.8%) in middle-income tracts compared to the percentage of owner-occupied units at 65.1% and the aggregate of all lenders at 59.0%. Andover made eight home improvement loans in upper-income tracts (13.8%) compared to proxy at 6.5% and the aggregate of all lenders at 9.7%.

Overall, Andover's lending performance was below the percentage of owner-occupied units and the aggregate of all lenders; therefore, Andover's geographic distribution of home improvement loans is reasonable.

Home Equity Lending

In 2019, Andover originated 21 home equity loans (19.6%) which was below the percentage of owner-occupied units at 28.4%. Given Andover's lending was below proxy, Andover's lending in moderate-income tracts is reasonable.

Andover originated 67 home equity loans (62.6%) in middle-income tracts compared to proxy at 65.1%. Andover made 19 home equity loans (17.8%) in upper-income tracts compared to proxy at 6.5%.

Overall, Andover's lending performance was below the percentage of owner-occupied units; therefore, the geographic distribution of home equity loans is reasonable.

Consumer Lending

In 2019, Andover originated a total of 68 consumer loans comprised of 40 motor vehicle loans (59.0%) and 28 other-unsecured loans (41.0%). Andover's performance was compared to the percentage of households by census tract (proxy). Overall, Andover's geographic distribution of consumer loans is reasonable.

Motor Vehicle Lending

In 2019, Andover originated seven motor vehicle loans (17.5%) in moderate-income tracts, which

was below the percentage of households at 34.9%. Therefore, Andover’s lending performance in moderate-income tracts is reasonable.

Andover originated 30 motor vehicle loans (75.0%) in middle-income tracts compared to the percentage of households at 59.8%. Andover made three motor vehicle loans (7.5%) in upper-income tracts compared to the percentage of total households at 5.3%.

Given that Andover’s lending in moderate-income tracts was below the percentage of households, Andover’s geographic distribution for motor vehicle loans is reasonable.

Other-Unsecured Lending

In 2019, Andover originated eleven loans (39.3%) of other-unsecured loans in moderate-income tracts, which was above the percentage of households at 34.9%. Therefore, Andover’s lending in moderate-income tracts is excellent.

Andover originated 15 loans (53.6%) of loans in middle-income tracts compared to the percentage of households. Andover made two other-unsecured loans (7.1%) in upper-income tracts compared to the percentage of households at 5.3%.

Andover’s lending in moderate-income tracts exceeded the percentage of households in these tracts. Access to unsecured small dollar loans enables individuals residing in lower-income areas, the ability to have access to smaller amounts of money to pay for items/services they could not otherwise afford at the time and potentially avoid high-cost payday lenders. Therefore, Andover’s geographic distribution of other-unsecured lending is excellent.

Community Development Test

Andover’s community development performance demonstrates excellent responsiveness to community development needs of Nonmetropolitan Ohio, particularly to area businesses impacted by the COVID-19 emergency through community development loans. Since the previous evaluation, Andover increased its level of community development lending, qualified donations, and community development services, which demonstrates responsiveness to addressing identified needs for assistance to small businesses and low- and moderate-income individuals and families, financial literacy, and community revitalization.

Community Development Lending

Andover originated or renewed 84 community development loans totaling \$8.1 million in Nonmetropolitan Ohio, which represents 63.5% of Andover’s total community development lending during this evaluation period. The following table shows the total number of community development loans by purpose, number, and dollar amount.

Purpose of CD Loan	#	\$
Revitalization/Stabilization	75	\$4,039,188
Services to LMI Individuals	9	\$4,030,000
Total	84	\$8,069,188

Most community development loans originated during this evaluation period were Paycheck Protection Program (PPP) loans made in response to the COVID-19 crisis to help local businesses remain open and retain their workforce. From April 1, 2020 through March 1, 2021, Andover originated 73 PPP loans totaling \$3.9 million that benefited area businesses located in low- and moderate-income geographies in Nonmetropolitan Ohio. PPP loans represent 86.9% of Andover’s total community development lending by volume and 48.0% by dollar amount in Nonmetropolitan Ohio. The remaining 11 community development loans totaling approximately \$4.2 million helped to rehabilitate three homes in a moderate-income geography; purchase a fire truck for a volunteer fire department serving a moderate-income community; provide working capital to community counseling center and a community action center providing mental health, drug counseling, and other wraparound services primarily to low- and moderate-income individuals; and provide operating capital to a school with a majority of students eligible for free- and reduced-lunch programs.

The community contact indicated that community development lending is increasingly important in this current economic environment and that community banks play a crucial role in contributing to the financial stability of the community, because the community contact believes that larger financial institutions seem reluctant to lend to small businesses that may have less-than-favorable financials.

Qualified Investments

Andover made 44 donations totaling \$101,117 to 25 organizations, which represents 89.5% of Andover’s total qualified donations during the evaluation period. The following table shows the total number of qualified donations by purpose, number, and dollar amount.

Purpose of Qualified Donation	#	\$
Services to LMI Individuals	31	\$87,022
Economic Development	13	\$14,095
Total	44	\$101,117

Andover increased its contributions in this assessment area by 118.3% since the previous evaluation. Several particularly responsive donations helped support a remote area medical program that provides free medical services to low- and moderate-income individuals and families and an area growth partnership that promotes economic development and assistance to small area businesses.

Community Development Services

Andover’s bank leadership provided their financial expertise as board and committee members to 23 community organizations by engaging in activities that promoted or facilitated services for low- and moderate-income individuals and economic development. In addition, bank staff provided financial literacy training to local schools in the amount of 118 hours.

METROPOLITAN AREA
(Limited-scope Review)

DESCRIPTION OF INSTITUTION’S OPERATIONS IN OHIO

Cleveland-Elyria OH MSA #17460

- As of December 31, 2019, Andover operated one branch in the assessment area, representing 14.2% of its branches in Ohio.
- As of June 30, 2019, Andover had \$22.4 million in deposits in this assessment area, representing a market share of 0.4% and 7.2% of its statewide deposits.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO

Through the use of available facts and data, including performance and demographic information, each assessment area’s performance was evaluated and compared with Andover’s performance in the state. The conclusions regarding performance are provided in the tables below. Please refer to the tables in Appendix A for information regarding these areas.

Assessment Area	Lending Test	Community Development Test
Cleveland-Elyria OH MSA #17460	Consistent	Below

For the lending test, Andover received a “Satisfactory” rating in Ohio. Performance in this limited-scope assessment area was consistent with Andover’s performance for the state. The borrower distribution is reasonable for HMDA loans. The geographic distribution of loans is reasonable, with a moderate level of lending gaps.

For the community development test, Andover received a “Outstanding” rating in Ohio. Community development was below Andover’s performance for the state. The weaker performance was primarily due to a lower level of contributions and services relative to Andover’s operational presence in the assessment area.

The performance in the limited-scope assessment area did not change the overall state rating.

COMMONWEALTH OF PENNSYLVANIA

CRA RATING for Commonwealth of Pennsylvania:¹⁰ Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors and criteria contributing to this rating include:

- The distribution of loans to borrowers reflects a reasonable penetration among individuals of different income levels (including low- and moderate-income);
- The geographic distribution of loans reflects a reasonable dispersion throughout the assessment area; and,
- Community development performance demonstrates an adequate responsiveness to the community development needs of the assessment area, considering the bank's capacity and the need and availability of such opportunities in the bank's assessment area.

SCOPE OF EXAMINATION

A full-scope review was conducted for the Erie MSA, Andover's only assessment area in Pennsylvania. The time period and products evaluated for this assessment area are consistent with the scope discussed in the Scope of Examination section of this report.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE COMMONWEALTH OF PENNSYLVANIA

Lending activity in Pennsylvania accounted for 22.8% of Andover's total lending activity or 25.6% of Andover's HMDA-reportable loans, 3.3% of HELOCs, and 21.8% of non-reportable consumer loans. As of June 30, 2019, Andover ranked 162nd among 181 insured institutions in Pennsylvania with a negligible deposit market share (<0.01%).

¹⁰For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

METROPOLITAN AREA
(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN ERIE, PA MSA #21500

The Erie MSA consists of the entirety of Erie County. Andover's delineated assessment area includes the entirety of Erie County and a portion of Crawford County. Crawford County is in Nonmetropolitan Pennsylvania; however, Andover has no branches or deposit-taking ATMs in this county. This assessment area consists of 63 tracts in Erie County and eight contiguous tracts in Crawford County. There are 11 low-, nine moderate-, 34 middle-, and 16 upper-income tracts. There is also an unknown-income tract south of Albion that has a state correctional institution.

Andover operates three branch offices with cash-only ATMs in this assessment area located in middle-income census tracts in Albion, Edinboro, and Millcreek. Andover did not open or close any branches during this evaluation period.

As of June 30, 2019, the FDIC Deposit Market Share Report ranks Andover ninth among 11 institutions operating in the assessment area with 0.9% market share. PNC Bank ranks first in the assessment area at 33.3%, followed by Northwest Bank at 18.1%, First National Bank of Pennsylvania at 14.3%, Marquette Savings Bank at 10.9%, and CNB Bank at 10.3%. This leaves a residual 13.2% market share area available to the remaining eight financial institutions in the assessment area. Deposits in the Erie MSA account for 13.5% of Andover's total deposits.

The 2019 HMDA Peer Market data indicates that Andover ranks fifteenth out of 188 HMDA reporters in the assessment area and originated 97 loans. Northwest Bank ranks first and Marquette Bank ranks second with 967 and 513 loans originated, respectively.

Community Contacts

An interview was conducted with a community contact to provide additional information regarding the assessment area. The contact was a representative from an affordable housing agency in Erie County. According to the community contact, local financial institutions are working to meet the needs of the community and have garnered relationships with local community service agencies. According to the contact, while the COVID-19 pandemic significantly impacted the county, it also forced community organizations to work together to share knowledge and resources. The contact indicated that the largest impediment for banks to originate loans is related to consumers' high debt and low credit scores. The community contact stated there is a need for banks to offer retail banking products and services, including financial literacy, to help low- and moderate-income borrowers combat these issues; however, until that happens, banks will not be able to truly meet the credit needs of the community.

The contact believes the city of Erie is undergoing a revitalization, because the population is increasing, blighted properties are being repurposed and small businesses are opening. Community organizations are working with local government and banks to provide the support needed to further these revitalization efforts and stabilize areas that have been long underserved.

Population Characteristics

Between 2010 and 2019, the Erie assessment area experienced population loss of about 4.2%, compared to Pennsylvania which experienced a slight population gain of about 0.8% during that same period of time.

Area	Population Change				
	2010 Population	2015 Population	Percent Change Between 2010 and	2019 Population	Percent Change Between 2015 and
Crawford County, Pennsylvania	88,765	87,343	-1.6%	84,629	-3.1%
Erie County, Pennsylvania	280,566	279,858	-0.3%	269,728	-3.6%
Pennsylvania	12,702,379	12,779,559	0.6%	12,801,989	0.2%

According to 2015 U.S. Census data, the total population in the assessment area was 273,682, of which 221,256 (81.0%) are 16 years old or older. The labor force totaled 135,801 (61.4%) and 7.7% of the labor force was unemployed. The labor force is defined as total persons who are 16 years and older, both employed and unemployed, that are actively seeking work. This translates into a potential labor workforce where the majority of the population are of the working- and consumer-age category with increased contribution to economic growth. Additionally, only 9.8% and 10.8% of the population live in low- and moderate-income census tracts, respectively, which limits Andover's customer base and their ability to serve the area's credit needs, especially given the competition in the region and Andover's small market share.

The city of Erie is the most populous city in the county with population of 181,307. In Erie County, 28.0% of the population have attained a bachelor's degree or higher and 91.3% have attained a high school degree or higher.¹¹ The county compares positively with Pennsylvania's rate of bachelor's degree or higher at 29.3% and the national rate of 30.3%. The higher educational attainment of the population indicates more economic opportunity for the population.

Erie County has been significantly impacted by the opioid epidemic. As indicated in *The Opioid Epidemic and Its Effects: A Perspective on What We Know from the Federal Reserve Bank of Cleveland*,¹² recent research suggests that counties that have higher levels of opioid prescriptions have substantially lower prime-age labor force participation rates and reduced labor market activity, which ultimately impacts economic growth potential of a local area.

Income Characteristics

According to HUD data, the 2019 MFI in the Erie MSA increased from 58,100 in 2017 to \$66,800 in 2019, an increase of 13.0%.

¹¹ U.S. Census Bureau QuickFacts: Erie County, Pennsylvania

¹² <https://www.clevelandfed.org/newsroom-and-events/publications/community-development-briefs/db-20180531-the-opioid-epidemic.aspx>

Borrower Income Levels Erie, PA MSA										
FFIEC Estimated Median Family Income			Low		Moderate		Middle		Upper	
Year	\$	% Change	0	- 49.99%	50%	- 79.99%	80%	- 119.99%	120%	- & above
2017	\$58,100		0	- \$29,049	\$29,050	- \$46,479	\$46,480	- \$69,719	\$69,720	- & above
2018	\$63,700	8.8%	0	- \$31,849	\$31,850	- \$50,959	\$50,960	- \$76,439	\$76,440	- & above
2019	\$66,800	4.6%	0	- \$33,399	\$33,400	- \$53,439	\$53,440	- \$80,159	\$80,160	- & above

Of the 68,375 families in the assessment area, 38.5% are designated as low- and moderate-income, with 11.7% living below the poverty level compared to 9.3% of families living below the poverty level within Pennsylvania. Additionally, of the 107,922 total households in the assessment area, 4,184 households (3.9%) receive public assistance.

As shown in the table below, Erie County’s poverty rate steadily increased 5.4% from 2017 to 2019. Crawford County and Pennsylvania had steadily decreasing poverty rates from 2017 to 2019.

Poverty Rates Assessment Area: Erie County, PA MSA #21500			
Area	Years		
	2017	2018	2019
Crawford County, Pennsylvania	14.6	13.4	12.6
Erie County, Pennsylvania	15.7	15.3	16.6
Pennsylvania	12.5	12.2	12.0
National	13.4	13.1	12.3

Erie County also had significantly higher poverty rates of those employed in the workforce. In 2018, Erie County and the city of Erie had an employed poverty rate of 8.3% and 15.5%, respectively, while Pennsylvania had an employed poverty rate of 6.5%. According to data from the United Way of Erie County, the 2018 Federal Poverty Household income was \$12,140 for an individual and \$25,100 for a family of four.¹³ This data indicates that it may be difficult for Andover to make loans, even for people who are employed.

Housing Characteristics

According to the 2015 U.S. Census data, there are 122,228 housing units in the assessment area of which 58.7% are owner-occupied units, 29.5% are rental units and 11.7% are vacant. By census tract, owner-occupied units make up 24.9% of total housing units in low-, 37.0% in moderate-income census tracts.

According to the 2015 U.S. Census data, the median age of housing stock in the assessment area is 59 years compared to 61 years in low- and moderate-income census tracts. Between 2010 and 2015, the MHV increased by 6.2% in Erie County and 7.0% in Crawford County compared to the Pennsylvania’s 4.2% increase. Housing became less affordable in Erie County and more affordable in Crawford County from 2010 to 2015; however, as shown in the table below, housing is still more affordable in the assessment area than in Pennsylvania.

¹³ [Poverty Data - United Way of Erie County \(unitedwayerie.org\)](http://www.unitedwayerie.org)

County	Housing Costs Change							
	Median Housing Value		Percent Change	2010 Affordability Ratio	2015 Affordability Ratio	Median Gross Rent		Percent Change
	2010	2015				2010	2015	
Crawford County, Pennsylvania	\$ 97,900	\$ 104,800	7.0%	39.8	42.5	\$ 553	\$ 619	11.9%
Erie County, Pennsylvania	\$ 111,300	\$ 118,200	6.2%	39.2	38.9	\$ 616	\$ 689	11.9%
Pennsylvania	\$ 159,300	\$ 166,000	4.2%	31.6	32.3	\$ 739	\$ 840	13.7%

According to the 2015 U.S. Census data, the MGR for the assessment area is \$687. As shown in the table above, median gross rents in Crawford and Erie counties increased by 11.9% between 2010 and 2015. Given that 46.9% of renters in the assessment area have rent costs greater than 30.0% of their income and 26.9% of low-income households and 20.4% of moderate-income households have rent costs greater than 30.0% of their income, this could have significant impact on the ability to save for a home.

Building permits are a leading indicator of future activity in the construction sector. As indicated in the table below, building permits increased by 17.3% between 2018 and 2019 in Crawford County and decreased by 47.2% in Erie County. The increase in building permits in Crawford County could indicate an increasing demand for home purchase loans. Conversely, a decrease, especially as significant as 47.2%, indicates a lower demand for home purchase loans in Erie County.

Building Permits					
Area	2017	2018	% Change between 2017 and 2018	2019	% Change between 2018 and 2019
Crawford County	80	52	-35.0%	61	17.3%
Erie County	265	305	15.1%	161	-47.2%
Erie County, Pennsylvania MSA	265	305	15.1%	161	-47.2%
Pennsylvania	22,584	23,325	3.3%	23,539	0.9%
United States	1,281,977	1,328,827	3.7%	1,386,048	4.3%

Labor, Employment and Economic Characteristics

Unemployment rates in the assessment area consistently exceed the state and national unemployment rates; however, unemployment rates are trending downward as shown in the table below.

Unemployment Rates			
Assessment Area: Erie, PA MSA #21500			
Area	Years - Annualized		
	2017	2018	2019
Crawford County, Pennsylvania	5.5	4.6	4.7
Erie County, Pennsylvania	5.7	4.6	4.6
Erie, PA MSA	5.7	4.6	4.6
Pennsylvania	4.9	4.2	4.4
National	4.4	3.9	3.7

In addition, the opioid epidemic has also strained the employable workforce in the assessment area, as Erie County ranks 16th in the state for opioid-related deaths. According to the DEA's PA Opioid Report, the opioid epidemic has an impact on the workforce population, as the highest rates of overdose occur in the 25-54 age group that has approximately 71-78% of its population employed. The Pennsylvania Chamber commissioned a survey of 428 employers regarding their

experiences with and expectations of the workforce, in which 52% of the respondents said that it was very difficult or extremely difficult to recruit qualified candidates to fill the needs of their company.

As of September 30, 2020, The Pennsylvania Department of Labor and Industry reports¹⁴ the top five employers in the county are: Erie Indemnity Co., UPMC Hamot, Wabtec US Rail Inc., State Government, and Wal-Mart Associates Inc. As of March 2021, health care and social assistance is the largest employment sectors in the assessment area, followed by manufacturing. Employees in the healthcare sector and manufacturing sector earn annual wages of \$45,000 and \$60,000, respectively.¹⁵

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ERIE, PA MSA #21500

Lending Test

The lending performance in the Erie MSA is reasonable. Details of Andover's HMDA and consumer lending can be found in the tables in Appendix D.

Lending to Borrowers of Different Income Levels

Andover's lending penetration among borrowers of different income (including low- and moderate-income) levels in the Erie MSA is considered reasonable. Factors such as housing values and poverty levels impacted Andover's ability to originate certain types of loans.

HMDA Lending

During the evaluation period, Andover made 210 HMDA loans in the assessment area. Andover's performance was compared to the percentage of families by family income (proxy) and the aggregate of all lenders.

Andover made 85 HMDA loans in 2019 totaling \$8.4 million. Andover also originated one loan (1.2%) to a borrower with an unknown-income designation. Andover originated four (4.7%) loans to low-income borrowers, which was substantially below proxy at 20.9% and below the aggregate of all lenders at 9.4%. Given Andover's performance relative to proxy, lending to low-income borrowers is poor.

Andover originated ten loans (11.8%) to moderate-income borrowers, which was below proxy at 17.6% and the aggregate of all lenders at 21.7%. Given Andover's performance relative to proxy and the aggregate of all lenders, the borrower distribution of HMDA loans to moderate-income borrowers is reasonable.

Andover originated 21 (24.7%) HMDA loans to middle-income borrowers compared to proxy at

¹⁴ [Erie County Top 50.pdf\(pa.gov\)](#)

¹⁵ <https://www.workstats.dli.pa.gov/Documents/County%20Profiles/Erie%20County.pdf>

20.8% and the aggregate of all lenders at 25.1%. Andover made 49 loans to upper-income borrowers compared to the proxy at 40.7% and the aggregate of all lenders at 35.6%.

Andover made 59 HMDA loans in 2018 totaling \$5.6 million. In addition, Andover originated one loan (1.7%) to a borrower with an unknown-income designation. Andover made three loans (5.1%) to low-income borrowers, which was substantially below proxy, but comparable to the aggregate of all lenders at 9.6%. The poverty level likely impacted Andover's ability to originate HMDA loans. Given Andover's performance relative to the aggregate of all lenders, the borrower distribution of HMDA loans to low-income borrowers is reasonable.

Andover made eleven loans (18.6%) to moderate-income borrowers, which was above proxy and slightly below the aggregate of all lenders at 91.7%. Given the performance compared to proxy and the aggregate of all lenders, the borrower distribution of HMDA loans to moderate-income borrowers is reasonable.

Andover made 16 (27.1%) HMDA loans to middle-income borrowers compared to proxy. Andover made 28 loans to upper-income borrowers, which represents 47.5% of HMDA loans compared to proxy.

Andover made 66 HMDA loans in 2017 totaling \$5.6 million. In addition, Andover originated three loans (4.5%) to borrowers with unknown-income designations. Andover made two loans (3.0%) totaling \$117,000 to low-income borrowers, which was substantially below the percentage of families at 20.9% and below the aggregate of all lenders at 7.4%. The overall poverty level for the assessment area is 27.7%, which is higher than the poverty level in Pennsylvania. Erie County has significantly higher poverty rates for those employed in the workforce. The poverty levels likely impacted opportunities for lending. Therefore, Andover's borrower distribution of HMDA loans to low-income borrowers is reasonable.

Andover made ten HMDA loans (15.2%) totaling \$434,000 to moderate-income borrowers, which was below the percentage of families at 17.6% and the aggregate of all lenders at 19.0%. Given the performance compared to proxy, the borrower distribution of HMDA loans to moderate-income borrowers is reasonable.

Andover made 12 HMDA loans to middle-income borrowers. This represents 18.2% of HMDA loans compared to the percentage of families at 20.8%. Andover made 39 HMDA loans to upper-income borrowers. This represents 59.1% of HMDA loans compared to the percentage of families at 40.7%.

Overall, Andover's HMDA lending was below the percentage of families and the aggregate of all lenders; therefore, the borrower distribution of HDMA lending is reasonable.

Consumer Lending

Andover made 24 consumer loans totaling \$323,000 in 2019. Andover's performance was compared to the households by household income in the assessment area (proxy).

Andover originated six loans (25.0%) to low-income borrowers, which was above proxy at 24.2%. Consumer loans are typically lower dollar loans and have a significant impact to low-income borrowers. Andover’s ability to make these types of loans helps their assessment area and develops banking relationships with low-income borrowers, who would be less likely to seek out predatory lenders for small dollar amount loans. Given Andover’s performance relative to proxy, its lending to low-income borrowers is reasonable.

Andover originated three loans (12.5%) to moderate-income borrowers, which was below proxy at 15.9%. Given Andover’s performance relative to proxy the borrower distribution of consumer loans to moderate-income borrowers is reasonable.

Andover made eight (33.3%) loans to middle-income borrowers compared to proxy at 17.7%. Andover made seven (29.2%) loans to upper-income borrowers compared to the proxy at 35.6%. This represents 29.2% of consumer loans compared to proxy.

Overall, Andover’s consumer loan performance was slightly below the percentage of households; therefore, the borrower distribution of consumer loans is reasonable.

Geographic Distribution of Loans

Andover’s geographic distribution reflects a reasonable dispersion of loans in the Erie MSA. Andover has a substantial level of lending gaps.

Tract Income Level	Percentage of Lending Penetration		
	2017	2018	2019
Low	0.0%	0.0%	0.0%
Moderate	11.1%	11.1%	22.2%
Middle	50.0%	44.1%	61.8%
Upper	31.3%	37.5%	56.3%
Unknown	0.0%	0.0%	0.0%
Total	32.4%	31.0%	45.1%

During the evaluation period, Andover did not originate loans in the low-income tracts and only originated loans in one moderate-income tract. Andover penetrated less than 50.0% of its geographies during the evaluation period; however, it is noted that Andover’s lending penetration rate significantly improved in 2019. While there are opportunities to originate loans in low- and moderate-income tracts, Andover only has 0.9% of the market share and there is significant competition from other financial institutions in this market.

HMDA Lending

During the evaluation period, Andover made 210 HMDA loans. Andover’s performance was compared to the percentage of owner-occupied units by tract income (proxy) and compared to the aggregate of all lenders.

In 2019, Andover made no HMDA loans in low-income tracts compared to the percentage of

owner-occupied units at 4.5% and the aggregate of all lenders at 1.9%. It is likely that poverty and unemployment rates had a substantial impact on Andover's ability to originate HMDA loans in these tracts. Therefore, Andover's geographic distribution of HMDA loans in low-income tracts is poor.

Andover made six (7.1%) HMDA loans in moderate-income tracts, which was slightly above the percentage of owner-occupied units at 7.0%. In addition, Andover's lending in moderate-income tracts exceeded the aggregate of all lenders at 5.9%. Therefore, Andover's geographic distribution of HMDA loans in moderate-income tracts is excellent.

Andover made 52 (61.2%) HMDA loans in middle-income tracts, compared to the percentage of owner-occupied units at 55.7% and the aggregate of all lenders at 53.2%. Andover made 27 (31.8%) HMDA loans in upper-income tracts compared to the percentage of owner-occupied units in these tracts at 32.8% and the aggregate of all lenders at 39.0%.

In 2018, Andover made no HMDA loans (0.0%) in low-income tracts compared to the percentage of owner-occupied units at 4.5% and the aggregate of all lenders at 2.2%. It is likely that poverty and unemployment rates had a substantial impact on Andover's ability to originate HMDA loans in these census tracts. Therefore, Andover's geographic distribution of HMDA loans in low-income tracts is poor.

Andover made three (5.1%) loans in moderate-income tracts, which was below the percentage of owner-occupied units in these tracts at 7.0% and below the aggregate of all lenders at 6.5%. Therefore, Andover's geographic distribution of HMDA loans in moderate-income tracts is reasonable.

Andover made 36 (61.0%) loans in middle-income tracts compared to the percentage of owner-occupied units at 55.7% and the aggregate of all lenders at 52.3%. Andover made 20 (33.9%) HMDA loans in upper-income tracts compared to the percentage of owner-occupied units in these tracts at 32.8% and the aggregate of all lenders at 39.0%.

In 2017, Andover made no HMDA loans in low-income tracts compared to the percentage of owner-occupied units in these tracts at 4.5% and the aggregate of all lenders at 1.8%. It is likely that poverty and unemployment rates had a substantial impact on Andover's ability to originate HMDA loans in these census tracts. Therefore, Andover's geographic distribution of HMDA loans in low-income tracts is poor.

Andover made four (6.1%) loans in moderate-income tracts, which was slightly below the percentage of owner-occupied units in these tracts at 7.0%. In addition, Andover's lending in moderate-income tracts was comparable to the aggregate of all lenders at 6.9%. Therefore, Andover's geographic distribution of HMDA loans in moderate-income tracts is reasonable.

Andover made 43 loans in middle-income tracts. This represents 65.2% of HMDA loans, compared to the percentage of owner-occupied units in these tracts at 55.7%. Andover made 19 (28.8%) HMDA loans in upper-income tracts, compared to the percentage of owner-occupied units in these tracts at 32.8%.

Overall, Andover’s HMDA lending was below the percentage of owner-occupied units and the aggregate of all lenders; therefore, the geographic distribution of HDMA lending is reasonable.

Consumer Lending

During 2019, Andover made 24 consumer loans totaling \$323,000. Andover’s performance was compared to the percentage of households by census tract (proxy).

In 2019, Andover made no loans in low-income tracts compared to the percentage of households at 10.4%. It is likely that poverty impacted Andover’s ability to lend in these tracts, as 28.4% of households in low-income tracts are below the poverty level and 30.6% are receiving public assistance. Therefore, Andover’s geographic distribution of HMDA loans in low-income tracts is poor.

Andover made one (4.2%) loan in moderate-income tracts, which was below the percentage of households in these tracts at 11.0%. Therefore, Andover’s geographic distribution of consumer loans moderate-income tracts is poor.

Andover made 17 (70.8%) loans in middle-income tracts compared to the percentage of households at 51.1%. Andover made six (25.0%) loans in upper-income tracts compared to proxy at 27.5%.

Overall, Andover’s consumer lending was below the percentage of total households; therefore, the geographic distribution of consumer lending is poor.

Community Development Test

Andover’s community development performance demonstrates an adequate responsiveness to the community development needs of its assessment area through community development lending, donations, and community development services.

According to a community contact, while Erie has a functioning nonprofit network, these organizations still need the assistance of financial institutions to meet the needs of a community. Major needs identified in this assessment area include assistance for addressing poverty and income and education inequality.

Community Development Lending

Andover originated six community development loans totaling \$240,726, which represents a 1.9% of total community development lending during this evaluation period. The following table shows the total number of community development loans by purpose, number and dollar amount.

Purpose of CD Loan	#	\$
Revitalization/Stabilization	6	\$240,726
Total	6	\$240,726
<i>*totals include all CD loans the benefit Pennsylvania</i>		

Between April 1, 2020 through March 1, 2021, Andover originated three PPP loans totaling \$113,722 that benefited four area businesses located in low- and moderate-income geographies in the Erie assessment area. The two remaining community development loans provided working capital to a small business in a moderate-income geography.

Lastly, consideration was given to a PPP loan totaling \$8,186 that helped a business in a moderate-income geography in a contiguous county retain its workforce during the COVID-19 crisis. PPP loans represent 66.7% of Andover's total community development lending by volume and 47.2% by dollar amount in Pennsylvania. These community development loans are considered to be particularly responsive because they benefit area businesses impacted by the COVID-19 pandemic.

Community Development Investments

Andover made 15 donations totaling \$11,685 to 13 organizations throughout the Erie MSA. This represents 10.3% of Andover's total qualified donations made during the evaluation period.

Several particularly responsive donations helped support services targeted to low- and moderate-income individuals and families include but are not limited to free tax preparation services, temporary housing, emergency food assistance, and contributing to a fundraiser to raise money to pay children's' medical expenses. Another noteworthy donation supported an area growth partnership that promotes economic development and assistance to small area businesses in Erie.

Community Development Services

Andover's directors, officers, and staff members provided their financial expertise to 10 community organizations by engaging in activities that promoted or facilitated services for low- and moderate-income individuals and economic development.

APPENDIX A

SCOPE OF EXAMINATION TABLES

Scope of Examination			
TIME PERIOD REVIEWED	Lending Test: January 1, 2017 – December 31, 2019 Community Development Test: July 11, 2017 – February 22, 2021		
FINANCIAL INSTITUTION Andover Bank, Andover, Ohio			PRODUCTS REVIEWED HMDA – home purchase, refinance, home improvement HELOCs Consumer – motor vehicle, other secured
Andover Bank has no affiliate relationships subject to examination.			

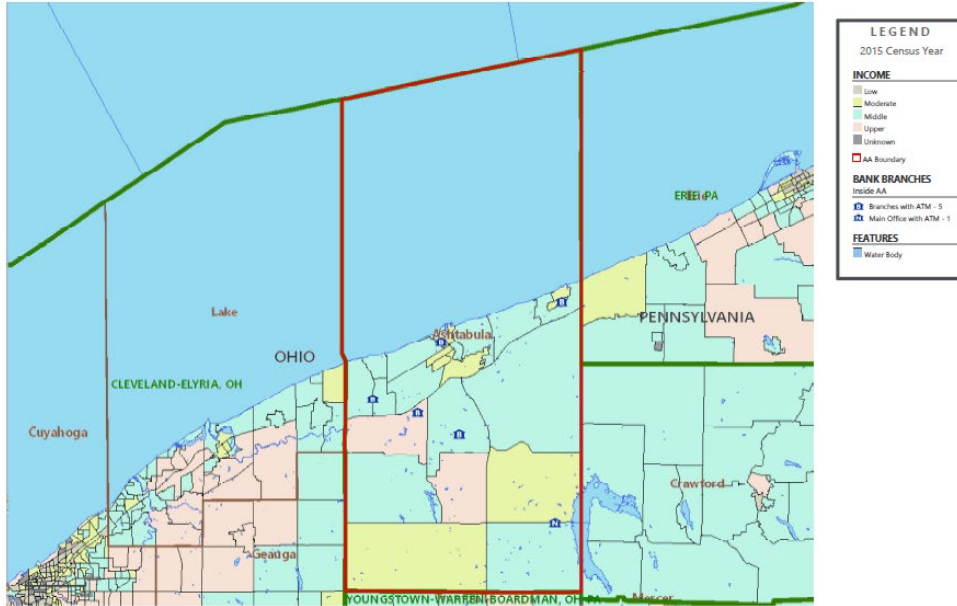
There is a statutory requirement that the written evaluation of a multistate institution’s performance must list the individual branches examined in each state.

LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
OHIO Nonmetropolitan Ohio Cleveland-Elyria OH MSA	Full-scope review Limited-scope review		
PENNSYLVANIA Erie PA MSA	Full-scope review		

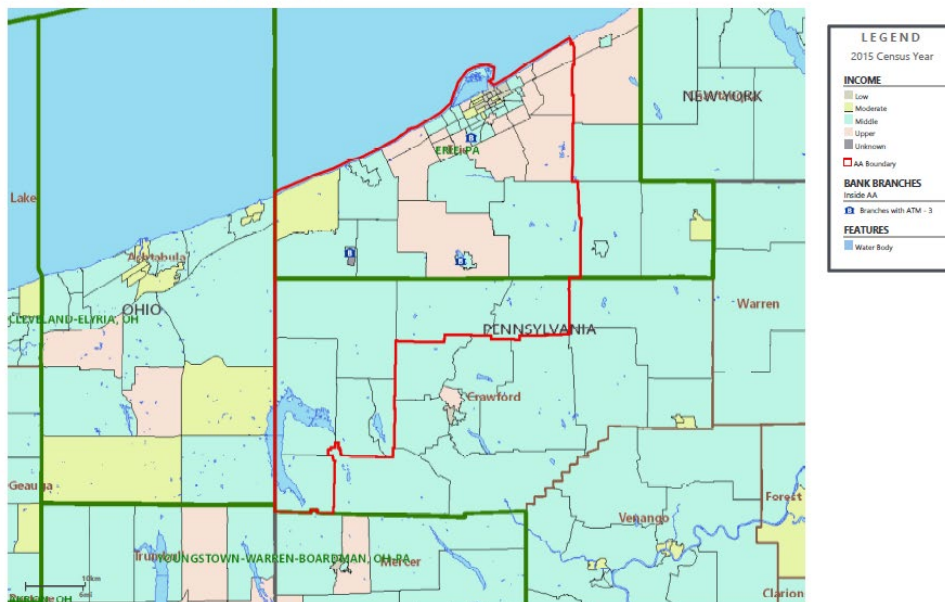
APPENDIX B

ASSESSMENT AREA MAPS

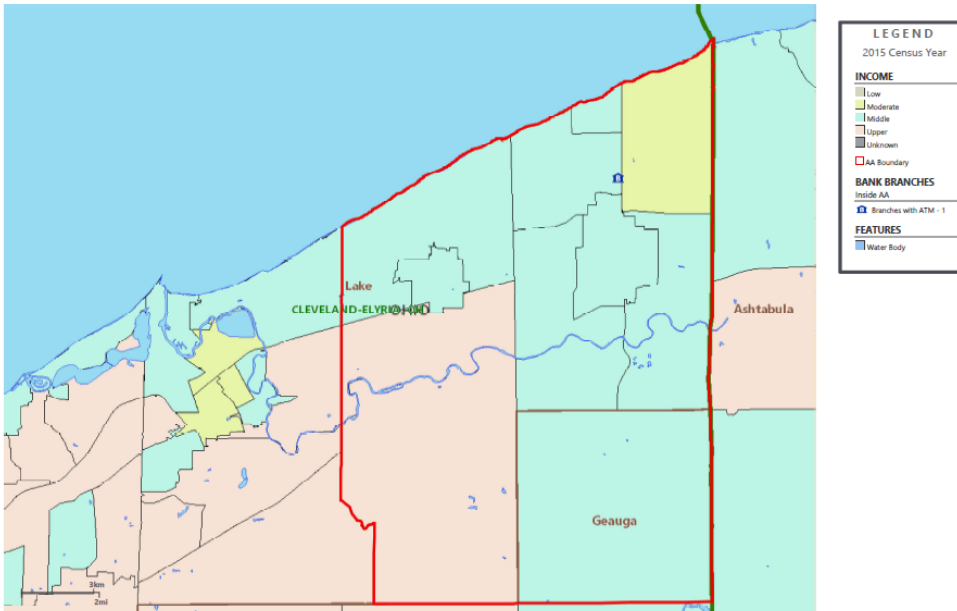
Assessment Area: 2019 Ohio Non-metropolitan



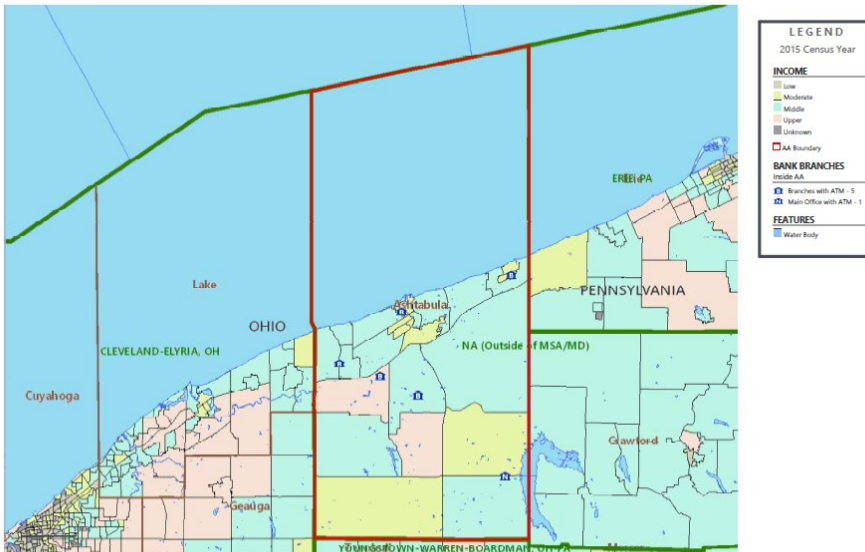
Assessment Area: 2019 Erie, PA MSA #21500



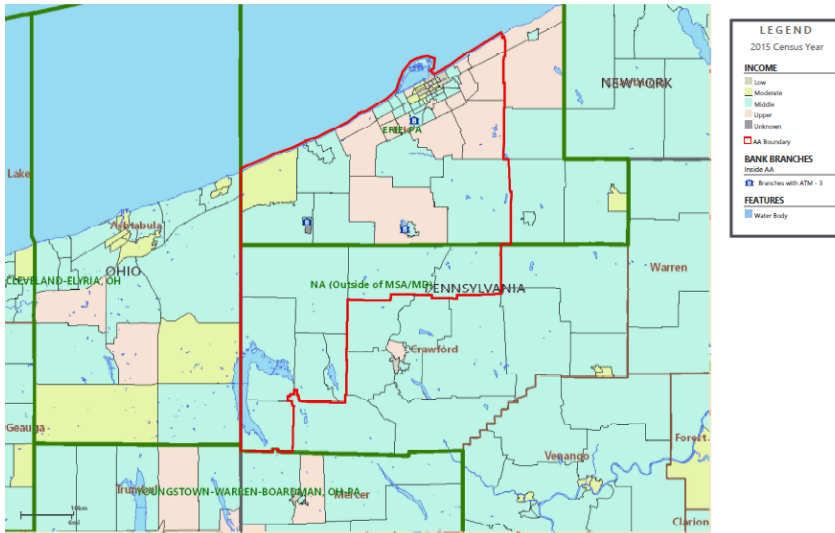
Assessment Area: 2019 Cleveland-Elyria, OH MSA #17460



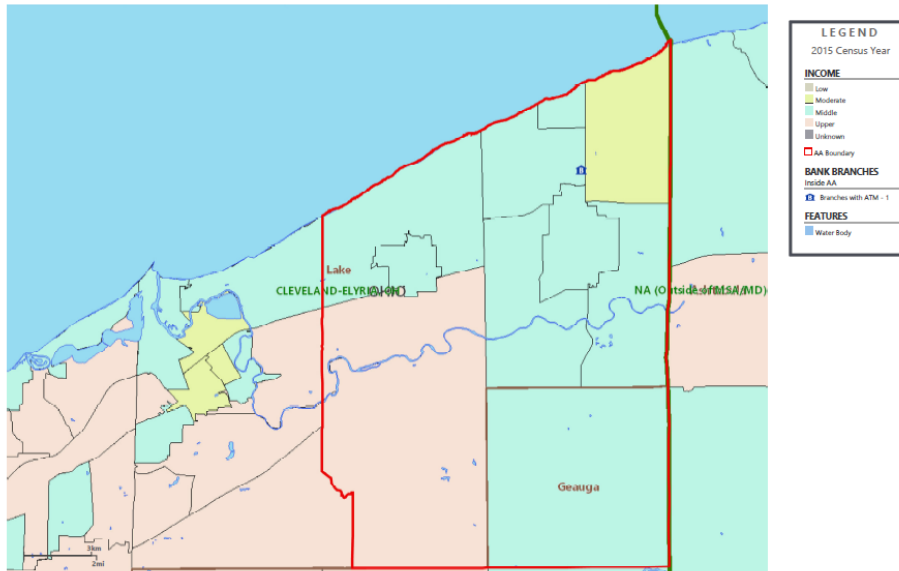
Assessment Area: 2018 Ohio Non-metropolitan



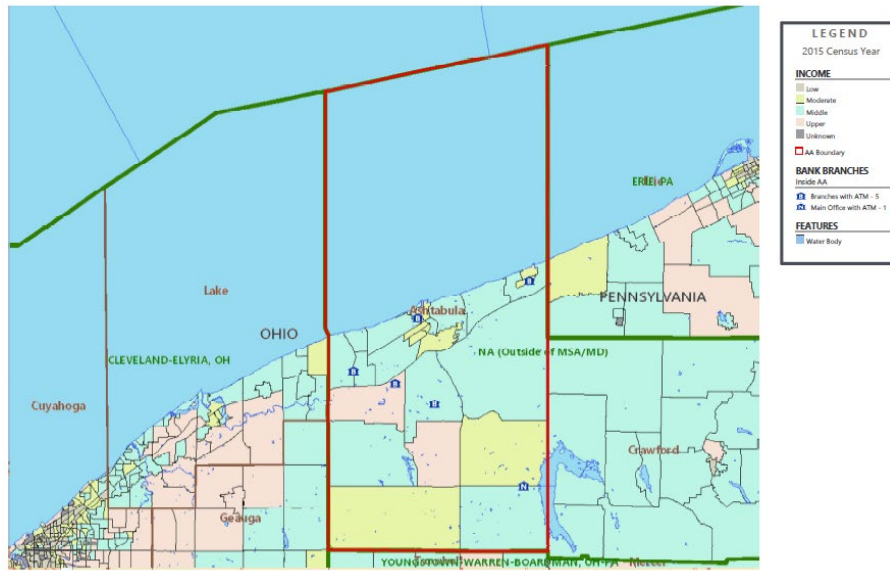
Assessment Area: 2018 Erie, PA MSA #21500



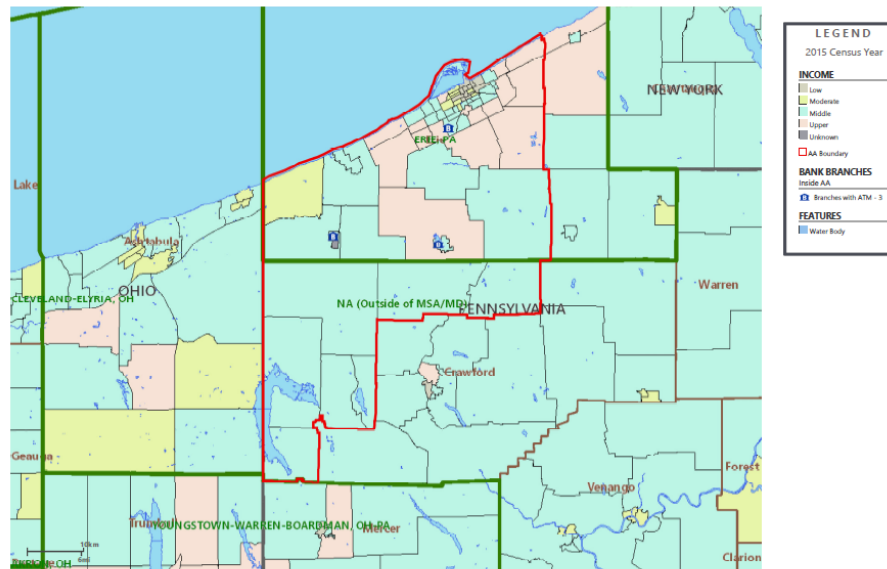
Assessment Area: 2018 Cleveland-Elyria, OH MSA #17460



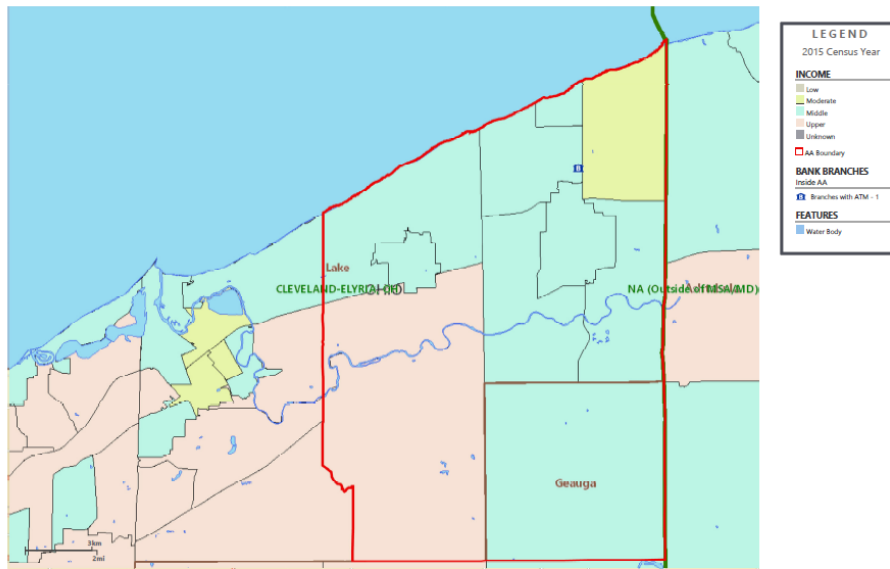
Assessment Area: 2017 Ohio Non-metropolitan



Assessment Area: 2017 Erie, PA MSA #21500



Assessment Area: 2017 Cleveland-Elyria, OH MSA #17460



APPENDIX C

DEMOGRAPHIC TABLES

Combined Demographics Report

Assessment Area(s): 2019 OH Nonmetropolitan

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	5,941	23.6	
Moderate-income	9	34.6	8,363	33.2	1,898	22.7	5,010	19.9	
Middle-income	14	53.8	15,309	60.7	1,624	10.6	5,664	22.5	
Upper-income	2	7.7	1,534	6.1	104	6.8	8,591	34.1	
Unknown-income	1	3.8	0	0.0	0	0.0	0	0.0	
Total Assessment Area	26	100.0	25,206	100.0	3,626	14.4	25,206	100.0	
	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	16,035	7,871	28.4	49.1	5,693	35.5	2,471	15.4	
Middle-income	27,484	18,022	65.1	65.6	5,242	19.1	4,220	15.4	
Upper-income	2,388	1,808	6.5	75.7	254	10.6	326	13.7	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	45,907	27,701	100.0	60.3	11,189	24.4	7,017	15.3	
	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	0.0
Moderate-income	1,229	1,111	34.2	34.2	96	35.4	22	29.7	
Middle-income	2,151	1,942	59.9	59.9	162	59.8	47	63.5	
Upper-income	209	191	5.8	5.9	13	4.8	5	6.8	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	3,589	3,244	100.0	100.0	271	100.0	74	100.0	
	Percentage of Total Businesses:			90.4	7.6		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	0.0
Moderate-income	62	60	34.1	34.1	2	40.0	0	0.0	
Middle-income	102	101	56.0	57.4	1	20.0	0	0.0	
Upper-income	18	15	9.9	8.5	2	40.0	1	100.0	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	182	176	100.0	100.0	5	100.0	1	100.0	
	Percentage of Total Farms:			96.7	2.7		.5		

2019 FFIEC Census Data and 2019 D&B Information

Combined Demographics Report

Assessment Area(s): 2019 PA Erie MSA #21500

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	11	15.5	5,744	8.4	2,527	44.0	14,295	20.9	
Moderate-income	9	12.7	6,277	9.2	1,301	20.7	12,018	17.6	
Middle-income	34	47.9	35,511	51.9	3,348	9.4	14,253	20.8	
Upper-income	16	22.5	20,843	30.5	809	3.9	27,809	40.7	
Unknown-income	1	1.4	0	0.0	0	0.0	0	0.0	
Total Assessment Area	71	100.0	68,375	100.0	7,985	11.7	68,375	100.0	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied		Rental		Vacant			
		#	%	#	%	#	%	#	%
Low-income	12,955	3,226	4.5	24.9	7,957	61.4	1,772	13.7	
Moderate-income	13,526	5,008	7.0	37.0	6,833	50.5	1,685	12.5	
Middle-income	64,452	39,986	55.7	62.0	15,204	23.6	9,262	14.4	
Upper-income	31,295	23,536	32.8	75.2	6,172	19.7	1,587	5.1	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	122,228	71,756	100.0	58.7	36,166	29.6	14,306	11.7	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	1,257	12.7	1,041	11.9	208	19.7	8	6.6	
Moderate-income	912	9.2	778	8.9	131	12.4	3	2.5	
Middle-income	5,041	50.8	4,476	51.2	486	45.9	79	65.3	
Upper-income	2,714	27.3	2,450	28.0	233	22.0	31	25.6	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	9,924	100.0	8,745	100.0	1,058	100.0	121	100.0	
Percentage of Total Businesses:			88.1		10.7		1.2		
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	1	0.5	1	0.5	0	0.0	0	0.0	
Moderate-income	6	2.8	6	2.9	0	0.0	0	0.0	
Middle-income	143	67.5	139	66.8	4	100.0	0	0.0	
Upper-income	62	29.2	62	29.8	0	0.0	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	212	100.0	208	100.0	4	100.0	0	.0	
Percentage of Total Farms:			98.1		1.9		.0		

2019 FFIEC Census Data and 2019 D&B Information

Combined Demographics Report

Assessment Area(s): 2019 OH Cleveland-Elyria MSA #17460

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	1,511	16.8
Moderate-income	1	9.1	1,324	14.7	94	7.1	1,594	17.7
Middle-income	8	72.7	5,926	65.9	276	4.7	2,053	22.8
Upper-income	2	18.2	1,740	19.4	59	3.4	3,832	42.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	11	100.0	8,990	100.0	429	4.8	8,990	100.0
	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	
Moderate-income	2,264	1,402	13.8	61.9	538	23.8	324	14.3
Middle-income	9,028	6,817	67.0	75.5	1,560	17.3	651	7.2
Upper-income	2,285	1,962	19.3	85.9	191	8.4	132	5.8
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	13,577	10,181	100.0	75.0	2,289	16.9	1,107	8.2
	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	171	13.3	160	13.4	10	13.3	1	5.9
Middle-income	902	69.9	832	69.4	56	74.7	14	82.4
Upper-income	217	16.8	206	17.2	9	12.0	2	11.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	1,290	100.0	1,198	100.0	75	100.0	17	100.0
Percentage of Total Businesses:					92.9	5.8	1.3	
	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	5	10.9	4	9.3	1	33.3	0	0.0
Middle-income	32	69.6	31	72.1	1	33.3	0	0.0
Upper-income	9	19.6	8	18.6	1	33.3	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	46	100.0	43	100.0	3	100.0	0	.0
Percentage of Total Farms:				93.5	6.5	.0		

2019 FFIEC Census Data and 2019 D&B Information

Combined Demographics Report

Assessment Area(s): 2018 OH Nonmetropolitan

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	6,016	23.9
Moderate-income	9	34.6	8,363	33.2	1,898	22.7	5,042	20.0
Middle-income	14	53.8	15,309	60.7	1,624	10.6	5,670	22.5
Upper-income	2	7.7	1,534	6.1	104	6.8	8,478	33.6
Unknown-income	1	3.8	0	0.0	0	0.0	0	0.0
Total Assessment Area	26	100.0	25,206	100.0	3,626	14.4	25,206	100.0
	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	16,035	7,871	28.4	49.1	5,693	35.5	2,471	15.4
Middle-income	27,484	18,022	65.1	65.6	5,242	19.1	4,220	15.4
Upper-income	2,388	1,808	6.5	75.7	254	10.6	326	13.7
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	45,907	27,701	100.0	60.3	11,189	24.4	7,017	15.3
	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	1,252	1,122	34.3	103	36.1	27	30.7	
Middle-income	2,169	1,950	59.7	164	57.5	55	62.5	
Upper-income	220	196	6.0	18	6.3	6	6.8	
Unknown-income	0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	3,641	3,268	100.0	285	100.0	88	100.0	
Percentage of Total Businesses:				89.8	7.8	2.4		
	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	65	63	34.6	2	33.3	0	0.0	
Middle-income	107	104	57.1	3	50.0	0	0.0	
Upper-income	17	15	8.2	1	16.7	1	100.0	
Unknown-income	0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	189	182	100.0	6	100.0	1	100.0	
Percentage of Total Farms:				96.3	3.2	.5		

2018 FFIEC Census Data and 2018 D&B Information

Combined Demographics Report

Assessment Area(s): 2018 PA Erie MSA #21500

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	11	15.5	5,744	8.4	2,527	44.0	14,295	20.9
Moderate-income	9	12.7	6,277	9.2	1,301	20.7	12,018	17.6
Middle-income	34	47.9	35,511	51.9	3,348	9.4	14,253	20.8
Upper-income	16	22.5	20,843	30.5	809	3.9	27,809	40.7
Unknown-income	1	1.4	0	0.0	0	0.0	0	0.0
Total Assessment Area	71	100.0	68,375	100.0	7,985	11.7	68,375	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	12,955	3,226	4.5	24.9	7,957	61.4	1,772	13.7
Moderate-income	13,526	5,008	7.0	37.0	6,833	50.5	1,685	12.5
Middle-income	64,452	39,986	55.7	62.0	15,204	23.6	9,262	14.4
Upper-income	31,295	23,536	32.8	75.2	6,172	19.7	1,587	5.1
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	122,228	71,756	100.0	58.7	36,166	29.6	14,306	11.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,269	12.8	1,049	12.0	213	19.9	7	5.9
Moderate-income	921	9.3	788	9.0	131	12.2	2	1.7
Middle-income	5,055	50.9	4,487	51.3	490	45.8	78	66.1
Upper-income	2,684	27.0	2,417	27.7	236	22.1	31	26.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	9,929	100.0	8,741	100.0	1,070	100.0	118	100.0
Percentage of Total Businesses:			88.0		10.8		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	0.9	2	0.9	0	0.0	0	0.0
Moderate-income	6	2.8	6	2.8	0	0.0	0	0.0
Middle-income	149	69.0	145	68.4	4	100.0	0	0.0
Upper-income	59	27.3	59	27.8	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	216	100.0	212	100.0	4	100.0	0	.0
Percentage of Total Farms:			98.1		1.9		.0	

2018 FFIEC Census Data and 2018 D&B Information

Combined Demographics Report

Assessment Area(s): 2018 OH Cleveland-Elyria MSA #17460

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	1,511	16.8	
Moderate-income	1	9.1	1,324	14.7	94	7.1	1,594	17.7	
Middle-income	8	72.7	5,926	65.9	276	4.7	2,053	22.8	
Upper-income	2	18.2	1,740	19.4	59	3.4	3,832	42.6	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	11	100.0	8,990	100.0	429	4.8	8,990	100.0	
	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	2,264	1,402	13.8	61.9	538	23.8	324	14.3	
Middle-income	9,028	6,817	67.0	75.5	1,560	17.3	651	7.2	
Upper-income	2,285	1,962	19.3	85.9	191	8.4	132	5.8	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	13,577	10,181	100.0	75.0	2,289	16.9	1,107	8.2	
	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	173	13.4	161	13.5	10	12.8	2	8.3	
Middle-income	890	68.8	813	68.2	58	74.4	19	79.2	
Upper-income	231	17.9	218	18.3	10	12.8	3	12.5	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	1,294	100.0	1,192	100.0	78	100.0	24	100.0	
		Percentage of Total Businesses:		92.1		6.0		1.9	
	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	5	9.8	4	8.5	1	25.0	0	0.0	
Middle-income	36	70.6	34	72.3	2	50.0	0	0.0	
Upper-income	10	19.6	9	19.1	1	25.0	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	51	100.0	47	100.0	4	100.0	0	.0	
		Percentage of Total Farms:		92.2		7.8		.0	

2018 FFIEC Census Data and 2018 D&B Information

Combined Demographics Report

Assessment Area(s): 2017 OH Nonmetropolitan

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	6,016	23.9
Moderate-income	9	34.6	8,363	33.2	1,898	22.7	5,042	20.0
Middle-income	14	53.8	15,309	60.7	1,624	10.6	5,670	22.5
Upper-income	2	7.7	1,534	6.1	104	6.8	8,478	33.6
Unknown-income	1	3.8	0	0.0	0	0.0	0	0.0
Total Assessment Area	26	100.0	25,206	100.0	3,626	14.4	25,206	100.0
	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	0.0
Moderate-income	16,035	7,871	28.4	49.1	5,693	35.5	2,471	15.4
Middle-income	27,484	18,022	65.1	65.6	5,242	19.1	4,220	15.4
Upper-income	2,388	1,808	6.5	75.7	254	10.6	326	13.7
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	45,907	27,701	100.0	60.3	11,189	24.4	7,017	15.3
	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	1,114	35.4	979	35.0	111	39.8	24	33.3
Middle-income	1,827	58.1	1,631	58.3	153	54.8	43	59.7
Upper-income	206	6.5	186	6.7	15	5.4	5	6.9
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	3,147	100.0	2,796	100.0	279	100.0	72	100.0
		Percentage of Total Businesses:		88.8		8.9		2.3
	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	57	33.1	55	32.9	2	40.0	0	0.0
Middle-income	97	56.4	96	57.5	1	20.0	0	0.0
Upper-income	18	10.5	16	9.6	2	40.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	172	100.0	167	100.0	5	100.0	0	.0
		Percentage of Total Farms:		97.1		2.9		.0

2017 FFIEC Census Data and 2017 D&B Information

Combined Demographics Report

Assessment Area(s): 2017 PA Erie MSA #21500

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	11	15.5	5,744	8.4	2,527	44.0	14,295	20.9	
Moderate-income	9	12.7	6,277	9.2	1,301	20.7	12,018	17.6	
Middle-income	34	47.9	35,511	51.9	3,348	9.4	14,253	20.8	
Upper-income	16	22.5	20,843	30.5	809	3.9	27,809	40.7	
Unknown-income	1	1.4	0	0.0	0	0.0	0	0.0	
Total Assessment Area	71	100.0	68,375	100.0	7,985	11.7	68,375	100.0	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied			Rental		Vacant		
		#	%	#	%	#	%	#	%
Low-income	12,955	3,226	4.5	24.9	7,957	61.4	1,772	13.7	
Moderate-income	13,526	5,008	7.0	37.0	6,833	50.5	1,685	12.5	
Middle-income	64,452	39,986	55.7	62.0	15,204	23.6	9,262	14.4	
Upper-income	31,295	23,536	32.8	75.2	6,172	19.7	1,587	5.1	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	122,228	71,756	100.0	58.7	36,166	29.6	14,306	11.7	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	1,089	12.3	868	11.3	217	20.4	4	4.1	
Moderate-income	832	9.4	703	9.2	128	12.0	1	1.0	
Middle-income	4,546	51.4	3,988	51.9	490	46.1	68	69.4	
Upper-income	2,374	26.9	2,120	27.6	229	21.5	25	25.5	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	8,841	100.0	7,679	100.0	1,064	100.0	98	100.0	
Percentage of Total Businesses:						86.9	12.0		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	1.0	2	1.0	0	0.0	0	0.0	
Moderate-income	7	3.4	7	3.5	0	0.0	0	0.0	
Middle-income	137	67.2	134	66.7	3	100.0	0	0.0	
Upper-income	58	28.4	58	28.9	0	0.0	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	204	100.0	201	100.0	3	100.0	0	.0	
Percentage of Total Farms:						98.5	1.5		.0

2017 FFIEC Census Data and 2017 D&B Information

Combined Demographics Report

Assessment Area(s): 2017 OH Cleveland-Elyria MSA #17460

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	1,511	16.8	
Moderate-income	1	9.1	1,324	14.7	94	7.1	1,594	17.7	
Middle-income	8	72.7	5,926	65.9	276	4.7	2,053	22.8	
Upper-income	2	18.2	1,740	19.4	59	3.4	3,832	42.6	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	11	100.0	8,990	100.0	429	4.8	8,990	100.0	
	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	2,264	1,402	13.8	61.9	538	23.8	324	14.3	
Middle-income	9,028	6,817	67.0	75.5	1,560	17.3	651	7.2	
Upper-income	2,285	1,962	19.3	85.9	191	8.4	132	5.8	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	13,577	10,181	100.0	75.0	2,289	16.9	1,107	8.2	
	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	142	127	12.7	13	15.9	2	9.5		
Middle-income	746	672	67.3	58	70.7	16	76.2		
Upper-income	213	199	19.9	11	13.4	3	14.3		
Unknown-income	0	0	0.0	0	0.0	0	0.0		
Total Assessment Area	1,101	998	100.0	82	100.0	21	100.0		
Percentage of Total Businesses:				90.6		7.4	1.9		
	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	5	4	10.0	1	25.0	0	0.0		
Middle-income	28	26	65.0	2	50.0	0	0.0		
Upper-income	11	10	25.0	1	25.0	0	0.0		
Unknown-income	0	0	0.0	0	0.0	0	0.0		
Total Assessment Area	44	40	100.0	4	100.0	0	.0		
Percentage of Total Farms:				90.9		9.1	.0		

2017 FFIEC Census Data and 2017 D&B Information

APPENDIX D

LENDING TABLES

HMDA Loan Distribution Table

Exam: The Andover Bank 2020 - 2018 & 2019 Lending Data

Assessment Area/Group :2019 OH Nonmetropolitan

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0%	0	0.0%	3	5.2%	160	2.6%
Moderate	11	19.0%	965	15.5%	5	8.6%	302	4.9%
Low/Moderate Total	11	19.0%	965	15.5%	8	13.8%	462	7.4%
Middle	44	75.9%	5,023	80.8%	21	36.2%	1,947	31.3%
Upper	3	5.2%	232	3.7%	29	50.0%	3,811	61.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	58	100.0%	6,220	100.0%	58	100.0%	6,220	100.0%
	Refinance							
Low	0	0.0%	0	0.0%	11	7.7%	456	3.7%
Moderate	43	30.3%	3,163	25.8%	26	18.3%	1,780	14.5%
Low/Moderate Total	43	30.3%	3,163	25.8%	37	26.1%	2,236	18.2%
Middle	80	56.3%	6,858	55.9%	37	26.1%	2,687	21.9%
Upper	19	13.4%	2,258	18.4%	68	47.9%	7,356	59.9%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	142	100.0%	12,279	100.0%	142	100.0%	12,279	100.0%
	Home Improvement							
Low	0	0.0%	0	0.0%	2	9.5%	92	14.2%
Moderate	8	38.1%	248	38.2%	2	9.5%	120	18.5%
Low/Moderate Total	8	38.1%	248	38.2%	4	19.0%	212	32.6%
Middle	10	47.6%	347	53.4%	9	42.9%	248	38.2%
Upper	3	14.3%	55	8.5%	8	38.1%	190	29.2%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	21	100.0%	650	100.0%	21	100.0%	650	100.0%
	Multi-Family							
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%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
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%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	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%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
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%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	6	23.1%	165	14.6%
Moderate	7	26.9%	223	19.7%	2	7.7%	60	5.3%
Low/Moderate Total	7	26.9%	223	19.7%	8	30.8%	225	19.9%
Middle	14	53.8%	753	66.6%	9	34.6%	300	26.5%
Upper	5	19.2%	155	13.7%	9	34.6%	606	53.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	26	100.0%	1,131	100.0%	26	100.0%	1,131	100.0%
	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%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
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%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	HMDA Totals							
Low	0	0.0%	0	0.0%	22	8.9%	873	4.3%
Moderate	69	27.9%	4,599	22.7%	35	14.2%	2,262	11.2%
Low/Moderate Total	69	27.9%	4,599	22.7%	57	23.1%	3,135	15.5%
Middle	148	59.9%	12,981	64.0%	76	30.8%	5,182	25.6%
Upper	30	12.1%	2,700	13.3%	114	46.2%	11,963	59.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	247	100.0%	20,280	100.0%	247	100.0%	20,280	100.0%

*Information based on 2015 ACS data

Consumer Loan Distribution Table

Exam: The Andover Bank 2020 - 2018 & 2019 Lending Data

Assessment Area/Group :2019 OH Nonmetropolitan

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	6	15.0%	68	8.8%
Moderate	7	17.5%	85	11.0%	8	20.0%	108	13.9%
Low/Moderate Total	7	17.5%	85	11.0%	14	35.0%	176	22.6%
Middle	30	75.0%	642	82.9%	10	25.0%	193	24.8%
Upper	3	7.5%	48	6.2%	14	35.0%	341	43.9%
Unknown	0	0.0%	0	0.0%	2	5.0%	67	8.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	40	100.0%	775	100.0%	40	100.0%	775	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	3	21.4%	22	7.7%
Moderate	4	28.6%	32	11.5%	6	42.9%	69	24.4%
Low/Moderate Total	4	28.6%	32	11.5%	9	64.3%	90	32.1%
Middle	8	57.1%	228	81.3%	0	0.0%	0	0.0%
Upper	2	14.3%	20	7.2%	5	35.7%	190	67.9%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	14	100.0%	280	100.0%	14	100.0%	280	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	8	28.6%	17	12.0%
Moderate	11	39.3%	56	40.2%	5	17.9%	28	20.3%
Low/Moderate Total	11	39.3%	56	40.2%	13	46.4%	45	32.3%
Middle	15	53.6%	81	57.6%	12	42.9%	83	59.7%
Upper	2	7.1%	3	2.1%	2	7.1%	10	7.3%
Unknown	0	0.0%	0	0.0%	1	3.6%	1	0.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	28	100.0%	140	100.0%	28	100.0%	140	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	17	20.7%	106	8.9%
Moderate	22	26.8%	173	14.5%	19	23.2%	204	17.1%
Low/Moderate Total	22	26.8%	173	14.5%	36	43.9%	311	26.0%
Middle	53	64.6%	951	79.5%	22	26.8%	276	23.1%
Upper	7	8.5%	71	5.9%	21	25.6%	541	45.3%
Unknown	0	0.0%	0	0.0%	3	3.7%	68	5.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	82	100.0%	1,195	100.0%	82	100.0%	1,195	100.0%

HMDA Loan Distribution Table

Exam: The Andover Bank 2020 - 2018 & 2019 Lending Data

Assessment Area/Group :2019 PA Erie MSA #21500

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	6.7%	200	10.5%	1	6.7%	80	4.2%
Low/Moderate Total	1	6.7%	200	10.5%	1	6.7%	80	4.2%
Middle	9	60.0%	907	47.4%	4	26.7%	529	27.7%
Upper	5	33.3%	806	42.1%	9	60.0%	1,171	61.2%
Unknown	0	0.0%	0	0.0%	1	6.7%	133	7.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	15	100.0%	1,913	100.0%	15	100.0%	1,913	100.0%
Refinance								
Low	0	0.0%	0	0.0%	4	6.3%	237	3.8%
Moderate	5	7.8%	446	7.1%	8	12.5%	538	8.6%
Low/Moderate Total	5	7.8%	446	7.1%	12	18.8%	775	12.3%
Middle	40	62.5%	3,699	58.9%	16	25.0%	1,381	22.0%
Upper	19	29.7%	2,137	34.0%	36	56.3%	4,126	65.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	64	100.0%	6,282	100.0%	64	100.0%	6,282	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	16.7%	50	26.9%
Low/Moderate Total	0	0.0%	0	0.0%	1	16.7%	50	26.9%
Middle	3	50.0%	89	47.8%	1	16.7%	55	29.6%
Upper	3	50.0%	97	52.2%	4	66.7%	81	43.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6	100.0%	186	100.0%	6	100.0%	186	100.0%
Multi-Family								
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%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
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%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
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%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
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%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	1	8.3%	6	1.1%
Moderate	1	8.3%	70	12.8%	4	33.3%	132	24.0%
Low/Moderate Total	1	8.3%	70	12.8%	5	41.7%	138	25.1%
Middle	7	58.3%	327	59.6%	2	16.7%	54	9.8%
Upper	4	33.3%	152	27.7%	5	41.7%	357	65.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	12	100.0%	549	100.0%	12	100.0%	549	100.0%
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%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
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%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	5	5.2%	243	2.7%
Moderate	7	7.2%	716	8.0%	14	14.4%	800	9.0%
Low/Moderate Total	7	7.2%	716	8.0%	19	19.6%	1,043	11.7%
Middle	59	60.8%	5,022	56.2%	23	23.7%	2,019	22.6%
Upper	31	32.0%	3,192	35.7%	54	55.7%	5,735	64.2%
Unknown	0	0.0%	0	0.0%	1	1.0%	133	1.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	97	100.0%	8,930	100.0%	97	100.0%	8,930	100.0%

*Information based on 2015 ACS data

Consumer Loan Distribution Table

Exam: The Andover Bank 2020 - 2018 & 2019 Lending Data

Assessment Area/Group :2019 PA Erie MSA #21500

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	1	8.3%	12	4.7%
Moderate	1	8.3%	7	2.8%	2	16.7%	52	20.3%
Low/Moderate Total	1	8.3%	7	2.8%	3	25.0%	65	24.9%
Middle	8	66.7%	168	64.7%	4	33.3%	59	22.9%
Upper	3	25.0%	84	32.5%	5	41.7%	135	52.1%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	12	100.0%	259	100.0%	12	100.0%	259	100.0%
	Other - Secured							
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%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	33.3%	10	33.7%	2	66.7%	16	53.4%
Upper	2	66.7%	20	66.3%	1	33.3%	14	46.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	30	100.0%	3	100.0%	30	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	5	55.6%	11	33.6%
Moderate	0	0.0%	0	0.0%	1	11.1%	1	3.2%
Low/Moderate Total	0	0.0%	0	0.0%	6	66.7%	12	36.8%
Middle	8	88.9%	24	76.3%	2	22.2%	13	39.5%
Upper	1	11.1%	8	23.7%	1	11.1%	8	23.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	9	100.0%	32	100.0%	9	100.0%	32	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	6	25.0%	23	7.1%
Moderate	1	4.2%	7	2.2%	3	12.5%	53	16.7%
Low/Moderate Total	1	4.2%	7	2.2%	9	37.5%	76	23.8%
Middle	17	70.8%	202	62.9%	8	33.3%	88	27.4%
Upper	6	25.0%	112	34.8%	7	29.2%	157	48.8%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	24	100.0%	321	100.0%	24	100.0%	321	100.0%

HMDA Loan Distribution Table

Exam: The Andover Bank 2020 - 2018 & 2019 Lending Data

Assessment Area/Group :2019 OH Cleveland-Elyria MSA #17460

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	2	66.7%	191	56.8%
Low/Moderate Total	0	0.0%	0	0.0%	2	66.7%	191	56.8%
Middle	3	100.0%	336	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	33.3%	145	43.2%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	336	100.0%	3	100.0%	336	100.0%
Refinance								
Low	0	0.0%	0	0.0%	2	7.4%	127	4.3%
Moderate	5	18.5%	486	16.3%	5	18.5%	408	13.7%
Low/Moderate Total	5	18.5%	486	16.3%	7	25.9%	535	18.0%
Middle	22	81.5%	2,488	83.7%	6	22.2%	740	24.9%
Upper	0	0.0%	0	0.0%	13	48.1%	1,632	54.9%
Unknown	0	0.0%	0	0.0%	1	3.7%	67	2.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	27	100.0%	2,974	100.0%	27	100.0%	2,974	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	33.3%	30	25.0%
Low/Moderate Total	0	0.0%	0	0.0%	1	33.3%	30	25.0%
Middle	2	66.7%	90	75.0%	0	0.0%	0	0.0%
Upper	1	33.3%	30	25.0%	2	66.7%	90	75.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	120	100.0%	3	100.0%	120	100.0%
Multi-Family								
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%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
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%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
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%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
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%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	20.0%	75	23.4%	1	20.0%	120	37.5%
Low/Moderate Total	1	20.0%	75	23.4%	1	20.0%	120	37.5%
Middle	4	80.0%	245	76.6%	4	80.0%	200	62.5%
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%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	5	100.0%	320	100.0%	5	100.0%	320	100.0%
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%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
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%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	2	5.3%	127	3.4%
Moderate	6	15.8%	561	15.0%	9	23.7%	749	20.0%
Low/Moderate Total	6	15.8%	561	15.0%	11	28.9%	876	23.4%
Middle	31	81.6%	3,159	84.2%	10	26.3%	940	25.1%
Upper	1	2.6%	30	0.8%	16	42.1%	1,867	49.8%
Unknown	0	0.0%	0	0.0%	1	2.6%	67	1.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	38	100.0%	3,750	100.0%	38	100.0%	3,750	100.0%

*Information based on 2015 ACS data

Consumer Loan Distribution Table

Exam: The Andover Bank 2020 - 2018 & 2019 Lending Data

Assessment Area/Group :2019 OH Cleveland-Elyria MSA #17460

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Motor Vehicle							
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%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	100.0%	4	100.0%	1	100.0%	4	100.0%
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%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	4	100.0%	1	100.0%	4	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	100.0%	7	100.0%	1	100.0%	7	100.0%
Low/Moderate Total	1	100.0%	7	100.0%	1	100.0%	7	100.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
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%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	7	100.0%	1	100.0%	7	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	50.0%	6	35.5%
Low/Moderate Total	0	0.0%	0	0.0%	1	50.0%	6	35.5%
Middle	2	100.0%	16	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	50.0%	10	64.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	16	100.0%	2	100.0%	16	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	25.0%	7	26.1%	2	50.0%	12	46.8%
Low/Moderate Total	1	25.0%	7	26.1%	2	50.0%	12	46.8%
Middle	3	75.0%	20	73.9%	1	25.0%	4	15.0%
Upper	0	0.0%	0	0.0%	1	25.0%	10	37.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	27	100.0%	4	100.0%	27	100.0%

HMDA Loan Distribution Table

Exam: The Andover Bank 2020 - 2018 & 2019 Lending Data

Assessment Area/Group :2018 OH Nonmetropolitan

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$ (000s)	%	#	%	\$ (000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	2	4.4%	98	2.0%
Moderate	12	26.7%	898	18.5%	9	20.0%	700	14.4%
Low/Moderate Total	12	26.7%	898	18.5%	11	24.4%	798	16.5%
Middle	29	64.4%	3,272	67.5%	8	17.8%	843	17.4%
Upper	4	8.9%	679	14.0%	26	57.8%	3,208	66.2%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	45	100.0%	4,849	100.0%	45	100.0%	4,849	100.0%
Refinance								
Low	0	0.0%	0	0.0%	5	5.7%	302	4.1%
Moderate	11	12.6%	735	10.0%	17	19.5%	1,108	15.1%
Low/Moderate Total	11	12.6%	735	10.0%	22	25.3%	1,410	19.2%
Middle	61	70.1%	5,088	69.5%	21	24.1%	1,285	17.5%
Upper	15	17.2%	1,502	20.5%	44	50.6%	4,630	63.2%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	87	100.0%	7,325	100.0%	87	100.0%	7,325	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	2	7.4%	40	3.6%
Moderate	6	22.2%	385	35.0%	5	18.5%	147	13.4%
Low/Moderate Total	6	22.2%	385	35.0%	7	25.9%	187	17.0%
Middle	18	66.7%	657	59.8%	9	33.3%	461	41.9%
Upper	3	11.1%	57	5.2%	11	40.7%	451	41.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	27	100.0%	1,099	100.0%	27	100.0%	1,099	100.0%
Multi-Family								
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%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	100.0%	225	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	1	100.0%	225	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	225	100.0%	1	100.0%	225	100.0%
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%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
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%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	1	7.7%	20	5.7%
Moderate	3	23.1%	92	26.1%	3	23.1%	56	15.9%
Low/Moderate Total	3	23.1%	92	26.1%	4	30.8%	76	21.5%
Middle	10	76.9%	261	73.9%	2	15.4%	24	6.8%
Upper	0	0.0%	0	0.0%	7	53.8%	253	71.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	13	100.0%	353	100.0%	13	100.0%	353	100.0%
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%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
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%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	10	5.8%	460	3.3%
Moderate	32	18.5%	2,110	15.2%	34	19.7%	2,011	14.5%
Low/Moderate Total	32	18.5%	2,110	15.2%	44	25.4%	2,471	17.8%
Middle	119	68.8%	9,503	68.6%	40	23.1%	2,613	18.9%
Upper	22	12.7%	2,238	16.2%	88	50.9%	8,542	61.7%
Unknown	0	0.0%	0	0.0%	1	0.6%	225	1.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	173	100.0%	13,851	100.0%	173	100.0%	13,851	100.0%

*Information based on 2015 ACS data

HMDA Loan Distribution Table

Exam: The Andover Bank 2020 - 2018 & 2019 Lending Data

Assessment Area/Group :2018 PA Erie MSA #21500

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	8.3%	117	9.5%	3	25.0%	317	25.7%
Low/Moderate Total	1	8.3%	117	9.5%	3	25.0%	317	25.7%
Middle	0	0.0%	0	0.0%	2	16.7%	189	15.3%
Upper	2	16.7%	239	19.4%	7	58.3%	727	59.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	12	100.0%	1,233	100.0%	12	100.0%	1,233	100.0%
Refinance								
Low	0	0.0%	0	0.0%	2	4.9%	121	2.9%
Moderate	2	4.9%	105	2.5%	7	17.1%	436	10.4%
Low/Moderate Total	2	4.9%	105	2.5%	9	22.0%	557	13.3%
Middle	24	58.5%	2,361	56.5%	11	26.8%	900	21.5%
Upper	15	36.6%	1,715	41.0%	20	48.8%	2,641	63.2%
Unknown	0	0.0%	0	0.0%	1	2.4%	83	2.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	41	100.0%	4,181	100.0%	41	100.0%	4,181	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	1	16.7%	38	16.3%
Moderate	0	0.0%	0	0.0%	1	16.7%	10	4.3%
Low/Moderate Total	0	0.0%	0	0.0%	2	33.3%	48	20.6%
Middle	3	50.0%	73	31.3%	3	50.0%	157	67.4%
Upper	3	50.0%	160	68.7%	1	16.7%	28	12.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6	100.0%	233	100.0%	6	100.0%	233	100.0%
Multi-Family								
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%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	100.0%	111	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	1	100.0%	111	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	111	100.0%	1	100.0%	111	100.0%
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%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
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%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
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%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	2	100.0%	55	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	2	100.0%	55	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	55	100.0%	2	100.0%	55	100.0%
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%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
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%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	3	4.8%	159	2.7%
Moderate	3	4.8%	222	3.8%	11	17.7%	763	13.1%
Low/Moderate Total	3	4.8%	222	3.8%	14	22.6%	922	15.9%
Middle	39	62.9%	3,477	59.8%	16	25.8%	1,246	21.4%
Upper	20	32.3%	2,114	36.4%	30	48.4%	3,451	59.4%
Unknown	0	0.0%	0	0.0%	2	3.2%	194	3.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	62	100.0%	5,813	100.0%	62	100.0%	5,813	100.0%

*Information based on 2015 ACS data

HMDA Loan Distribution Table

Exam: The Andover Bank 2020 - 2018 & 2019 Lending Data

Assessment Area/Group :2018 OH Cleveland-Elyria MSA #17460

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$ (000s)	%	#	%	\$ (000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	50.0%	65	36.3%	1	50.0%	65	36.3%
Low/Moderate Total	1	50.0%	65	36.3%	1	50.0%	65	36.3%
Middle	1	50.0%	114	63.7%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	50.0%	114	63.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	179	100.0%	2	100.0%	179	100.0%
Refinance								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	25.0%	103	33.8%	1	25.0%	58	19.0%
Low/Moderate Total	1	25.0%	103	33.8%	1	25.0%	58	19.0%
Middle	2	50.0%	144	47.2%	2	50.0%	190	62.3%
Upper	1	25.0%	58	19.0%	1	25.0%	57	18.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	305	100.0%	4	100.0%	305	100.0%
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%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	100.0%	25	100.0%	1	100.0%	25	100.0%
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%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	25	100.0%	1	100.0%	25	100.0%
Multi-Family								
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%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
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%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
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%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
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%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
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%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
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%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
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%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
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%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	28.6%	168	33.0%	2	28.6%	123	24.2%
Low/Moderate Total	2	28.6%	168	33.0%	2	28.6%	123	24.2%
Middle	4	57.1%	283	55.6%	3	42.9%	215	42.2%
Upper	1	14.3%	58	11.4%	2	28.6%	171	33.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	7	100.0%	509	100.0%	7	100.0%	509	100.0%

*Information based on 2015 ACS data

HMDA Loan Distribution Table

Exam: The Andover Bank 2020 - 2017 Lending Data

Assessment Area/Group :2017 OH Nonmetropolitan

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0%	0	0.0%	4	7.3%	262	6.0%
Moderate	12	21.8%	775	17.8%	10	18.2%	540	12.4%
Low/Moderate Total	12	21.8%	775	17.8%	14	25.5%	802	18.4%
Middle	37	67.3%	3,051	70.0%	19	34.5%	1,216	27.9%
Upper	6	10.9%	534	12.2%	22	40.0%	2,342	53.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	55	100.0%	4,360	100.0%	55	100.0%	4,360	100.0%
	Refinance							
Low	0	0.0%	0	0.0%	6	9.4%	298	6.1%
Moderate	16	25.0%	871	17.8%	10	15.6%	640	13.1%
Low/Moderate Total	16	25.0%	871	17.8%	16	25.0%	938	19.2%
Middle	41	64.1%	3,414	69.8%	18	28.1%	1,387	28.4%
Upper	7	10.9%	604	12.4%	29	45.3%	2,515	51.4%
Unknown	0	0.0%	0	0.0%	1	1.6%	49	1.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	64	100.0%	4,889	100.0%	64	100.0%	4,889	100.0%
	Home Improvement							
Low	0	0.0%	0	0.0%	5	8.6%	131	4.1%
Moderate	13	22.4%	636	19.9%	12	20.7%	533	16.7%
Low/Moderate Total	13	22.4%	636	19.9%	17	29.3%	664	20.8%
Middle	37	63.8%	2,071	65.0%	15	25.9%	967	30.3%
Upper	8	13.8%	481	15.1%	25	43.1%	1,519	47.6%
Unknown	0	0.0%	0	0.0%	1	1.7%	38	1.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	58	100.0%	3,188	100.0%	58	100.0%	3,188	100.0%
	Multi-Family							
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%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
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%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	HMDA Totals:							
Low	0	0.0%	0	0.0%	15	8.5%	691	5.6%
Moderate	41	23.2%	2,282	18.3%	32	18.1%	1,713	13.8%
Low/Moderate Total	41	23.2%	2,282	18.3%	47	26.6%	2,404	19.3%
Middle	115	65.0%	8,536	68.6%	52	29.4%	3,570	28.7%
Upper	21	11.9%	1,619	13.0%	76	42.9%	6,376	51.3%
Unknown	0	0.0%	0	0.0%	2	1.1%	87	0.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	177	100.0%	12,437	100.0%	177	100.0%	12,437	100.0%

*Information based on 2015 ACS data

HMDA Loan Distribution Table

Exam: The Andover Bank 2020 - 2017 Lending Data

Assessment Area/Group :2017 PA Erie MSA #21500

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	14.3%	64	10.7%	3	42.9%	150	25.0%
Low/Moderate Total	1	14.3%	64	10.7%	3	42.9%	150	25.0%
Middle	4	57.1%	309	51.6%	1	14.3%	100	16.7%
Upper	2	28.6%	226	37.7%	3	42.9%	349	58.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	7	100.0%	599	100.0%	7	100.0%	599	100.0%
Refinance								
Low	0	0.0%	0	0.0%	2	5.6%	117	3.3%
Moderate	0	0.0%	0	0.0%	3	8.3%	161	4.6%
Low/Moderate Total	0	0.0%	0	0.0%	5	13.9%	278	7.9%
Middle	27	75.0%	2,397	68.3%	6	16.7%	526	15.0%
Upper	9	25.0%	1,114	31.7%	24	66.7%	2,631	74.9%
Unknown	0	0.0%	0	0.0%	1	2.8%	76	2.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	36	100.0%	3,511	100.0%	36	100.0%	3,511	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	3	13.0%	146	9.7%	4	17.4%	123	8.2%
Low/Moderate Total	3	13.0%	146	9.7%	4	17.4%	123	8.2%
Middle	12	52.2%	618	41.1%	5	21.7%	236	13.7%
Upper	8	34.8%	740	49.2%	12	52.2%	888	59.0%
Unknown	0	0.0%	0	0.0%	2	8.7%	257	17.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	23	100.0%	1,504	100.0%	23	100.0%	1,504	100.0%
Multi-Family								
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%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
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%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	2	3.0%	117	2.1%
Moderate	4	6.1%	210	3.7%	10	15.2%	434	7.7%
Low/Moderate Total	4	6.1%	210	3.7%	12	18.2%	551	9.8%
Middle	43	65.2%	3,324	59.2%	12	18.2%	862	15.4%
Upper	19	28.8%	2,080	37.1%	39	59.1%	3,868	68.9%
Unknown	0	0.0%	0	0.0%	3	4.5%	333	5.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	66	100.0%	5,614	100.0%	66	100.0%	5,614	100.0%

*Information based on 2015 ACS data

HMDA Loan Distribution Table

Exam: The Andover Bank 2020 - 2017 Lending Data

Assessment Area/Group :2017 OH Cleveland-Elyria MSA #17460

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	2	40.0%	200	25.3%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	2	40.0%	200	25.3%
Middle	5	100.0%	789	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	3	60.0%	589	74.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	5	100.0%	789	100.0%	5	100.0%	789	100.0%
Refinance								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	3	50.0%	158	33.3%
Low/Moderate Total	0	0.0%	0	0.0%	3	50.0%	158	33.3%
Middle	6	100.0%	474	100.0%	1	16.7%	122	25.7%
Upper	0	0.0%	0	0.0%	2	33.3%	194	40.9%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6	100.0%	474	100.0%	6	100.0%	474	100.0%
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%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	2	100.0%	68	100.0%	1	50.0%	60	88.2%
Upper	0	0.0%	0	0.0%	1	50.0%	8	11.8%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	68	100.0%	2	100.0%	68	100.0%
Multi-Family								
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%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
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%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	2	15.4%	200	15.0%
Moderate	0	0.0%	0	0.0%	3	23.1%	158	11.9%
Low/Moderate Total	0	0.0%	0	0.0%	5	38.5%	358	26.9%
Middle	13	100.0%	1,331	100.0%	2	15.4%	182	13.7%
Upper	0	0.0%	0	0.0%	6	46.2%	791	59.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	13	100.0%	1,331	100.0%	13	100.0%	1,331	100.0%

*Information based on 2015 ACS data

APPENDIX E

PEER TABLES

Peer Group HMDA Loan Distribution Table

Exam ID: The Andover Bank 2020 - 2018 & 2019 Lending Data

Selected Year: 2019

2019 OH Nonmetropolitan

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0%	0	0.0%	112	8.9%	8,230	5.1%
Moderate	346	27.6%	38,781	23.8%	295	23.5%	29,506	18.1%
<i>Low/Moderate Total</i>	<i>346</i>	<i>27.6%</i>	<i>38,781</i>	<i>23.8%</i>	<i>407</i>	<i>32.5%</i>	<i>37,736</i>	<i>23.2%</i>
Middle	829	66.1%	109,881	67.5%	319	25.4%	42,000	25.8%
Upper	79	6.3%	14,068	8.6%	336	26.8%	59,830	36.8%
Unknown	0	0.0%	0	0.0%	192	15.3%	23,164	14.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1,254	100.0%	162,730	100.0%	1,254	100.0%	162,730	100.0%
	Refinance							
Low	0	0.0%	0	0.0%	72	8.4%	4,991	5.0%
Moderate	245	28.5%	24,465	24.5%	167	19.4%	15,835	15.9%
<i>Low/Moderate Total</i>	<i>245</i>	<i>28.5%</i>	<i>24,465</i>	<i>24.5%</i>	<i>239</i>	<i>27.8%</i>	<i>20,826</i>	<i>21.9%</i>
Middle	538	62.5%	64,609	64.7%	216	25.1%	21,901	21.9%
Upper	78	9.1%	10,811	10.8%	285	33.1%	37,113	37.2%
Unknown	0	0.0%	0	0.0%	121	14.1%	20,045	20.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	861	100.0%	99,885	100.0%	861	100.0%	99,885	100.0%
	Home Improvement							
Low	0	0.0%	0	0.0%	12	6.3%	451	4.3%
Moderate	62	32.8%	2,805	26.9%	46	24.3%	2,387	22.9%
<i>Low/Moderate Total</i>	<i>62</i>	<i>32.8%</i>	<i>2,805</i>	<i>26.9%</i>	<i>58</i>	<i>30.7%</i>	<i>2,838</i>	<i>27.2%</i>
Middle	107	56.6%	6,527	62.7%	59	31.2%	3,337	32.0%
Upper	20	10.6%	1,086	10.4%	71	37.6%	4,143	39.8%
Unknown	0	0.0%	0	0.0%	1	0.5%	100	1.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	189	100.0%	10,418	100.0%	189	100.0%	10,418	100.0%
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	20.0%	700	22.1%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>1</i>	<i>20.0%</i>	<i>700</i>	<i>22.1%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	4	80.0%	2,474	77.9%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	5	100.0%	3,174	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	5	100.0%	3,174	100.0%	5	100.0%	3,174	100.0%
	Other Purpose LOC							
Low	0	0.0%	0	0.0%	5	3.8%	137	1.5%
Moderate	36	27.3%	1,523	17.0%	30	22.7%	1,624	18.2%
<i>Low/Moderate Total</i>	<i>36</i>	<i>27.3%</i>	<i>1,523</i>	<i>17.0%</i>	<i>35</i>	<i>26.5%</i>	<i>1,761</i>	<i>19.7%</i>
Middle	88	66.7%	6,840	76.6%	39	29.5%	2,293	25.7%
Upper	8	6.1%	570	6.4%	56	42.4%	4,791	53.6%
Unknown	0	0.0%	0	0.0%	2	1.5%	88	1.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	132	100.0%	8,933	100.0%	132	100.0%	8,933	100.0%
	Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	8	11.3%	225	5.4%
Moderate	23	32.4%	1,463	35.4%	10	14.1%	354	8.6%
<i>Low/Moderate Total</i>	<i>23</i>	<i>32.4%</i>	<i>1,463</i>	<i>35.4%</i>	<i>18</i>	<i>25.4%</i>	<i>579</i>	<i>14.0%</i>
Middle	41	57.7%	2,389	57.7%	23	32.4%	1,425	34.4%
Upper	7	9.9%	286	6.9%	28	39.4%	1,733	41.9%
Unknown	0	0.0%	0	0.0%	2	2.8%	401	9.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	71	100.0%	4,138	100.0%	71	100.0%	4,138	100.0%
	Loan Purpose Not Applicable							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	15	28.8%	1,189	27.0%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>15</i>	<i>28.8%</i>	<i>1,189</i>	<i>27.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	35	67.3%	3,005	68.3%	0	0.0%	0	0.0%
Upper	2	3.8%	207	4.7%	1	1.9%	1	0.0%
Unknown	0	0.0%	0	0.0%	51	98.1%	4,400	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	52	100.0%	4,401	100.0%	52	100.0%	4,401	100.0%
	HMDA Totals							
Low	0	0.0%	0	0.0%	209	8.2%	14,034	4.8%
Moderate	728	28.4%	70,926	24.2%	548	21.4%	49,706	16.9%
<i>Low/Moderate Total</i>	<i>728</i>	<i>28.4%</i>	<i>70,926</i>	<i>24.2%</i>	<i>757</i>	<i>29.5%</i>	<i>63,740</i>	<i>21.7%</i>
Middle	1,642	64.0%	195,725	66.6%	656	25.6%	70,956	24.2%
Upper	194	7.6%	27,028	9.2%	777	30.3%	107,611	36.6%
Unknown	0	0.0%	0	0.0%	374	14.6%	51,372	17.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2,564	100.0%	293,679	100.0%	2,564	100.0%	293,679	100.0%

Peer Group HMDA Loan Distribution Table

Exam ID: The Andover Bank 2020 - 2018 & 2019 Lending Data

Selected Year: 2019

2019 PA Erie MSA #21500

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$ (000s)	%	#	%	\$ (000s)	%
	Home Purchase							
Low	69	2.3%	4,404	1.1%	324	10.8%	25,273	6.1%
Moderate	212	7.1%	19,772	4.7%	712	23.8%	71,760	17.2%
<i>Low/Moderate Total</i>	281	9.4%	24,176	5.8%	1,036	34.6%	97,033	23.3%
Middle	1,617	54.0%	189,540	45.5%	737	24.6%	96,863	23.2%
Upper	1,094	36.6%	203,091	48.7%	945	31.6%	190,380	45.7%
Unknown	0	0.0%	0	0.0%	274	9.2%	32,531	7.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2,992	100.0%	416,807	100.0%	2,992	100.0%	416,807	100.0%
	Refinance							
Low	21	1.0%	1,212	0.5%	164	7.7%	10,678	4.2%
Moderate	102	4.8%	9,549	3.8%	410	19.1%	33,022	13.0%
<i>Low/Moderate Total</i>	123	5.7%	10,761	4.2%	574	26.8%	43,700	17.2%
Middle	1,138	53.1%	117,866	46.4%	535	25.0%	55,109	21.7%
Upper	881	41.1%	125,415	49.4%	850	39.7%	124,622	49.1%
Unknown	0	0.0%	0	0.0%	183	8.5%	30,611	12.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2,142	100.0%	254,042	100.0%	2,142	100.0%	254,042	100.0%
	Home Improvement							
Low	18	2.8%	531	1.7%	57	8.7%	2,118	6.7%
Moderate	26	4.0%	889	2.8%	131	20.1%	5,565	17.7%
<i>Low/Moderate Total</i>	44	6.7%	1,420	4.3%	188	28.8%	7,683	24.3%
Middle	325	49.8%	14,891	47.4%	183	28.1%	8,749	27.9%
Upper	283	43.4%	15,100	48.1%	265	40.6%	14,167	45.1%
Unknown	0	0.0%	0	0.0%	16	2.5%	812	2.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	652	100.0%	31,411	100.0%	652	100.0%	31,411	100.0%
	Multi-Family							
Low	8	20.5%	6,340	11.0%	0	0.0%	0	0.0%
Moderate	11	28.2%	10,987	19.0%	1	2.6%	85	0.1%
<i>Low/Moderate Total</i>	19	48.7%	17,327	30.0%	1	2.6%	85	0.1%
Middle	13	33.3%	11,435	19.8%	1	2.6%	90	0.2%
Upper	7	17.9%	29,029	50.2%	5	12.8%	878	1.5%
Unknown	0	0.0%	0	0.0%	32	82.1%	56,738	98.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	39	100.0%	57,791	100.0%	39	100.0%	57,791	100.0%
	Other Purpose LOC							
Low	2	0.9%	40	0.3%	24	10.7%	1,089	8.3%
Moderate	11	4.9%	405	3.1%	32	14.3%	1,289	9.9%
<i>Low/Moderate Total</i>	13	5.8%	445	3.4%	56	25.0%	2,378	18.2%
Middle	110	49.1%	5,868	45.0%	47	21.0%	2,621	20.1%
Upper	101	45.1%	6,736	51.6%	118	52.7%	7,900	60.5%
Unknown	0	0.0%	0	0.0%	3	1.3%	150	1.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	224	100.0%	13,049	100.0%	224	100.0%	13,049	100.0%
	Other Purpose Closed/Exempt							
Low	13	4.2%	328	2.0%	25	8.0%	931	5.6%
Moderate	15	4.8%	632	3.8%	56	17.9%	2,017	12.1%
<i>Low/Moderate Total</i>	28	8.9%	960	5.8%	81	25.9%	2,948	17.7%
Middle	175	55.9%	8,843	53.2%	84	26.8%	3,826	23.0%
Upper	110	35.1%	6,810	41.0%	144	46.0%	9,639	58.0%
Unknown	0	0.0%	0	0.0%	4	1.3%	200	1.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	313	100.0%	16,613	100.0%	313	100.0%	16,613	100.0%
	Loan Purpose Not Applicable							
Low	7	10.4%	298	4.8%	0	0.0%	0	0.0%
Moderate	5	7.5%	214	3.4%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	12	17.9%	512	8.2%	0	0.0%	0	0.0%
Middle	32	47.8%	2,570	41.4%	0	0.0%	0	0.0%
Upper	23	34.3%	3,128	50.4%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	67	100.0%	6,210	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	67	100.0%	6,210	100.0%	67	100.0%	6,210	100.0%
	HMDA Totals							
Low	138	2.1%	13,153	1.7%	594	9.2%	40,089	5.0%
Moderate	382	5.9%	42,448	5.3%	1,342	20.9%	113,738	14.3%
<i>Low/Moderate Total</i>	520	8.1%	55,601	7.0%	1,936	30.1%	153,827	19.3%
Middle	3,410	53.0%	351,013	44.1%	1,587	24.7%	167,258	21.0%
Upper	2,499	38.9%	389,309	48.9%	2,327	36.2%	347,586	43.7%
Unknown	0	0.0%	0	0.0%	579	9.0%	127,252	16.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6,429	100.0%	795,923	100.0%	6,429	100.0%	795,923	100.0%

Peer Group HMDA Loan Distribution Table

Exam ID: The Andover Bank 2020 - 2018 & 2019 Lending Data

Selected Year: 2019

2019 OH Cleveland-Elyria MSA #17460

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0%	0	0.0%	51	8.1%	5,116	5.0%
Moderate	81	12.9%	11,121	10.8%	175	28.0%	22,444	21.8%
<i>Low/Moderate Total</i>	<i>81</i>	<i>12.9%</i>	<i>11,121</i>	<i>10.8%</i>	<i>226</i>	<i>36.1%</i>	<i>27,560</i>	<i>26.8%</i>
Middle	413	66.0%	65,656	63.8%	159	25.4%	26,942	26.2%
Upper	132	21.1%	26,105	25.4%	168	26.8%	36,635	35.6%
Unknown	0	0.0%	0	0.0%	73	11.7%	11,745	11.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	626	100.0%	102,882	100.0%	626	100.0%	102,882	100.0%
	Refinance							
Low	0	0.0%	0	0.0%	33	6.9%	3,321	4.7%
Moderate	49	10.2%	5,638	8.0%	87	18.1%	9,753	13.8%
<i>Low/Moderate Total</i>	<i>49</i>	<i>10.2%</i>	<i>5,638</i>	<i>8.0%</i>	<i>120</i>	<i>24.9%</i>	<i>13,074</i>	<i>18.6%</i>
Middle	312	64.9%	43,289	61.4%	107	22.2%	13,367	19.0%
Upper	120	24.9%	21,549	30.6%	175	36.4%	29,593	42.0%
Unknown	0	0.0%	0	0.0%	79	16.4%	14,442	20.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	481	100.0%	70,476	100.0%	481	100.0%	70,476	100.0%
	Home Improvement							
Low	0	0.0%	0	0.0%	10	11.9%	601	11.4%
Moderate	8	9.5%	470	8.9%	22	26.2%	1,457	27.6%
<i>Low/Moderate Total</i>	<i>8</i>	<i>9.5%</i>	<i>470</i>	<i>8.9%</i>	<i>32</i>	<i>38.1%</i>	<i>2,058</i>	<i>39.0%</i>
Middle	62	73.8%	3,944	74.7%	23	27.4%	1,446	27.4%
Upper	14	16.7%	869	16.4%	29	34.5%	1,779	33.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	84	100.0%	5,283	100.0%	84	100.0%	5,283	100.0%
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	100.0%	500	100.0%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>1</i>	<i>100.0%</i>	<i>500</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	1	100.0%	500	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	500	100.0%	1	100.0%	500	100.0%
	Other Purpose LOC							
Low	0	0.0%	0	0.0%	9	12.3%	523	9.6%
Moderate	7	9.6%	378	6.9%	15	20.5%	1,029	18.9%
<i>Low/Moderate Total</i>	<i>7</i>	<i>9.6%</i>	<i>378</i>	<i>6.9%</i>	<i>24</i>	<i>32.9%</i>	<i>1,552</i>	<i>28.5%</i>
Middle	52	71.2%	3,910	71.8%	19	26.0%	1,370	25.1%
Upper	14	19.2%	1,161	21.3%	30	41.1%	2,527	46.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	73	100.0%	5,449	100.0%	73	100.0%	5,449	100.0%
	Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	4	20.0%	199	15.4%	4	20.0%	185	14.3%
<i>Low/Moderate Total</i>	<i>4</i>	<i>20.0%</i>	<i>199</i>	<i>15.4%</i>	<i>4</i>	<i>20.0%</i>	<i>185</i>	<i>14.3%</i>
Middle	14	70.0%	1,049	81.0%	9	45.0%	535	41.3%
Upper	2	10.0%	47	3.6%	7	35.0%	575	44.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	20	100.0%	1,295	100.0%	20	100.0%	1,295	100.0%
	Loan Purpose Not Applicable							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	8.7%	248	9.9%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>2</i>	<i>8.7%</i>	<i>248</i>	<i>9.9%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	19	82.6%	2,047	81.9%	0	0.0%	0	0.0%
Upper	2	8.7%	205	8.2%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	23	100.0%	2,500	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	23	100.0%	2,500	100.0%	23	100.0%	2,500	100.0%
	HMDA Totals							
Low	0	0.0%	0	0.0%	103	7.9%	9,561	5.1%
Moderate	152	11.6%	18,554	9.8%	303	23.2%	34,868	18.5%
<i>Low/Moderate Total</i>	<i>152</i>	<i>11.6%</i>	<i>18,554</i>	<i>9.8%</i>	<i>406</i>	<i>31.0%</i>	<i>44,429</i>	<i>23.6%</i>
Middle	872	66.7%	119,895	63.6%	317	24.2%	43,660	23.2%
Upper	284	21.7%	49,936	26.5%	409	31.3%	71,109	37.7%
Unknown	0	0.0%	0	0.0%	176	13.5%	29,187	15.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1,308	100.0%	188,385	100.0%	1,308	100.0%	188,385	100.0%

Peer Group HMDA Loan Distribution Table

Exam ID: The Andover Bank 2020 - 2018 & 2019 Lending Data

Selected Year: 2018

2018 OH Nonmetropolitan

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0%	0	0.0%	107	8.7%	7,591	5.1%
Moderate	352	28.7%	40,369	27.0%	317	25.8%	31,396	21.0%
<i>Low/Moderate Total</i>	<i>352</i>	<i>28.7%</i>	<i>40,369</i>	<i>27.0%</i>	<i>424</i>	<i>34.5%</i>	<i>38,987</i>	<i>26.1%</i>
Middle	816	66.4%	99,558	66.6%	269	21.9%	33,362	22.3%
Upper	60	4.9%	9,533	6.4%	323	26.3%	52,795	35.3%
Unknown	0	0.0%	0	0.0%	212	17.3%	24,316	16.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>1,228</i>	<i>100.0%</i>	<i>149,460</i>	<i>100.0%</i>	<i>1,228</i>	<i>100.0%</i>	<i>149,460</i>	<i>100.0%</i>
	Refinance							
Low	0	0.0%	0	0.0%	62	9.8%	3,768	5.8%
Moderate	173	27.5%	15,094	23.1%	147	23.3%	13,099	20.1%
<i>Low/Moderate Total</i>	<i>173</i>	<i>27.5%</i>	<i>15,094</i>	<i>23.1%</i>	<i>209</i>	<i>33.2%</i>	<i>16,867</i>	<i>25.9%</i>
Middle	411	65.2%	45,165	69.3%	161	25.6%	14,518	22.3%
Upper	46	7.3%	4,943	7.6%	223	35.4%	29,471	45.2%
Unknown	0	0.0%	0	0.0%	37	5.9%	4,346	6.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>630</i>	<i>100.0%</i>	<i>65,202</i>	<i>100.0%</i>	<i>630</i>	<i>100.0%</i>	<i>65,202</i>	<i>100.0%</i>
	Home Improvement							
Low	0	0.0%	0	0.0%	17	8.9%	592	5.5%
Moderate	56	29.2%	3,021	28.1%	39	20.3%	1,516	14.1%
<i>Low/Moderate Total</i>	<i>56</i>	<i>29.2%</i>	<i>3,021</i>	<i>28.1%</i>	<i>56</i>	<i>29.2%</i>	<i>2,108</i>	<i>19.6%</i>
Middle	120	62.5%	7,025	65.3%	66	34.4%	3,091	28.7%
Upper	16	8.3%	720	6.7%	66	34.4%	5,231	48.6%
Unknown	0	0.0%	0	0.0%	4	2.1%	336	3.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>192</i>	<i>100.0%</i>	<i>10,766</i>	<i>100.0%</i>	<i>192</i>	<i>100.0%</i>	<i>10,766</i>	<i>100.0%</i>
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	33.3%	1,555	41.7%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>2</i>	<i>33.3%</i>	<i>1,555</i>	<i>41.7%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	4	66.7%	2,177	58.3%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	6	100.0%	3,732	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>6</i>	<i>100.0%</i>	<i>3,732</i>	<i>100.0%</i>	<i>6</i>	<i>100.0%</i>	<i>3,732</i>	<i>100.0%</i>
	Other Purpose LOC							
Low	0	0.0%	0	0.0%	19	12.3%	761	8.9%
Moderate	62	40.0%	2,900	33.8%	43	27.7%	2,224	25.9%
<i>Low/Moderate Total</i>	<i>62</i>	<i>40.0%</i>	<i>2,900</i>	<i>33.8%</i>	<i>62</i>	<i>40.0%</i>	<i>2,985</i>	<i>34.7%</i>
Middle	85	54.8%	4,866	56.6%	39	25.2%	2,171	25.3%
Upper	8	5.2%	825	9.6%	53	34.2%	3,420	39.8%
Unknown	0	0.0%	0	0.0%	1	0.6%	15	0.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>155</i>	<i>100.0%</i>	<i>8,591</i>	<i>100.0%</i>	<i>155</i>	<i>100.0%</i>	<i>8,591</i>	<i>100.0%</i>
	Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	4	6.5%	82	2.6%
Moderate	22	35.5%	1,386	44.0%	15	24.2%	562	17.8%
<i>Low/Moderate Total</i>	<i>22</i>	<i>35.5%</i>	<i>1,386</i>	<i>44.0%</i>	<i>19</i>	<i>30.6%</i>	<i>644</i>	<i>20.5%</i>
Middle	38	61.3%	1,683	53.4%	21	33.9%	1,058	33.6%
Upper	2	3.2%	80	2.5%	21	33.9%	1,417	45.0%
Unknown	0	0.0%	0	0.0%	1	1.6%	30	1.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>62</i>	<i>100.0%</i>	<i>3,149</i>	<i>100.0%</i>	<i>62</i>	<i>100.0%</i>	<i>3,149</i>	<i>100.0%</i>
	Loan Purpose Not Applicable							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	27	32.1%	1,955	24.9%	2	2.4%	166	2.1%
<i>Low/Moderate Total</i>	<i>27</i>	<i>32.1%</i>	<i>1,955</i>	<i>24.9%</i>	<i>2</i>	<i>2.4%</i>	<i>166</i>	<i>2.1%</i>
Middle	52	61.9%	5,214	66.5%	0	0.0%	0	0.0%
Upper	5	6.0%	677	8.6%	1	1.2%	1	0.0%
Unknown	0	0.0%	0	0.0%	81	96.4%	7,679	97.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>84</i>	<i>100.0%</i>	<i>7,846</i>	<i>100.0%</i>	<i>84</i>	<i>100.0%</i>	<i>7,846</i>	<i>100.0%</i>
	HMDA Totals							
Low	0	0.0%	0	0.0%	209	8.9%	12,794	5.1%
Moderate	694	29.4%	66,280	26.6%	563	23.9%	48,963	19.7%
<i>Low/Moderate Total</i>	<i>694</i>	<i>29.4%</i>	<i>66,280</i>	<i>26.6%</i>	<i>772</i>	<i>32.8%</i>	<i>61,757</i>	<i>24.8%</i>
Middle	1,526	64.7%	165,688	66.6%	556	23.6%	54,200	21.8%
Upper	137	5.8%	16,778	6.7%	687	29.1%	92,335	37.1%
Unknown	0	0.0%	0	0.0%	342	14.5%	40,454	16.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>2,357</i>	<i>100.0%</i>	<i>248,746</i>	<i>100.0%</i>	<i>2,357</i>	<i>100.0%</i>	<i>248,746</i>	<i>100.0%</i>

Peer Group HMDA Loan Distribution Table

Exam ID: The Andover Bank 2020 - 2018 & 2019 Lending Data

Selected Year: 2018

2018 PA Eric MSA #21500

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	70	2.5%	3,590	1.0%	277	9.9%	19,982	5.3%
Moderate	200	7.1%	17,093	4.5%	599	21.4%	58,528	15.6%
<i>Low/Moderate Total</i>	<i>270</i>	<i>9.6%</i>	<i>20,683</i>	<i>5.5%</i>	<i>876</i>	<i>31.2%</i>	<i>78,510</i>	<i>20.9%</i>
Middle	1,460	52.0%	167,594	44.6%	645	23.0%	81,780	21.8%
Upper	1,074	38.3%	187,306	49.9%	990	35.3%	177,365	47.2%
Unknown	1	0.0%	114	0.0%	294	10.5%	38,042	10.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2,805	100.0%	375,697	100.0%	2,805	100.0%	375,697	100.0%
	Refinance							
Low	29	1.7%	1,326	0.7%	161	9.4%	8,903	5.0%
Moderate	106	6.2%	8,222	4.6%	337	19.7%	24,871	14.0%
<i>Low/Moderate Total</i>	<i>135</i>	<i>7.9%</i>	<i>9,548</i>	<i>5.4%</i>	<i>498</i>	<i>29.1%</i>	<i>33,774</i>	<i>19.0%</i>
Middle	921	53.8%	84,096	47.4%	459	26.8%	43,004	24.2%
Upper	656	38.3%	83,917	47.3%	670	39.1%	90,412	50.9%
Unknown	0	0.0%	0	0.0%	85	5.0%	10,371	5.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1,712	100.0%	177,561	100.0%	1,712	100.0%	177,561	100.0%
	Home Improvement							
Low	11	1.8%	284	1.0%	52	8.7%	1,640	5.7%
Moderate	28	4.7%	805	2.8%	103	17.3%	4,244	14.9%
<i>Low/Moderate Total</i>	<i>39</i>	<i>6.6%</i>	<i>1,089</i>	<i>3.8%</i>	<i>155</i>	<i>26.1%</i>	<i>5,884</i>	<i>20.6%</i>
Middle	292	49.1%	13,225	46.3%	146	24.5%	6,888	24.1%
Upper	264	44.4%	14,246	49.9%	284	47.7%	14,920	52.2%
Unknown	0	0.0%	0	0.0%	10	1.7%	868	3.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	595	100.0%	28,560	100.0%	595	100.0%	28,560	100.0%
	Multi-Family							
Low	9	19.6%	3,055	3.3%	2	4.3%	92	0.1%
Moderate	9	19.6%	1,747	1.9%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>18</i>	<i>39.1%</i>	<i>4,802</i>	<i>5.1%</i>	<i>2</i>	<i>4.3%</i>	<i>92</i>	<i>0.1%</i>
Middle	24	52.2%	75,624	80.6%	1	2.2%	80	0.1%
Upper	4	8.7%	13,413	14.3%	3	6.5%	580	0.6%
Unknown	0	0.0%	0	0.0%	40	87.0%	93,087	99.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	46	100.0%	93,839	100.0%	46	100.0%	93,839	100.0%
	Other Purpose LOC							
Low	5	2.0%	326	1.8%	24	9.6%	1,449	8.0%
Moderate	12	4.8%	676	3.7%	47	18.9%	2,335	14.0%
<i>Low/Moderate Total</i>	<i>17</i>	<i>6.8%</i>	<i>1,002</i>	<i>5.5%</i>	<i>71</i>	<i>28.5%</i>	<i>3,984</i>	<i>22.0%</i>
Middle	124	49.8%	8,414	46.6%	65	26.1%	3,646	20.2%
Upper	108	43.4%	8,653	47.9%	108	43.4%	10,196	56.4%
Unknown	0	0.0%	0	0.0%	5	2.0%	243	1.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	249	100.0%	18,069	100.0%	249	100.0%	18,069	100.0%
	Other Purpose Closed/Exempt							
Low	5	1.7%	226	1.5%	26	8.8%	976	6.3%
Moderate	19	6.4%	738	4.8%	52	17.6%	1,926	12.5%
<i>Low/Moderate Total</i>	<i>24</i>	<i>8.1%</i>	<i>964</i>	<i>6.3%</i>	<i>78</i>	<i>26.4%</i>	<i>2,902</i>	<i>18.8%</i>
Middle	135	45.6%	6,667	43.3%	80	27.0%	3,612	23.4%
Upper	137	46.3%	7,774	50.5%	134	45.3%	8,658	56.2%
Unknown	0	0.0%	0	0.0%	4	1.4%	233	1.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	296	100.0%	15,405	100.0%	296	100.0%	15,405	100.0%
	Loan Purpose Not Applicable							
Low	6	5.1%	398	3.4%	0	0.0%	0	0.0%
Moderate	11	9.3%	571	4.9%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>17</i>	<i>14.4%</i>	<i>969</i>	<i>8.2%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	66	55.9%	6,256	53.2%	4	3.4%	485	4.1%
Upper	35	29.7%	4,536	38.6%	3	2.5%	371	3.2%
Unknown	0	0.0%	0	0.0%	111	94.1%	10,905	92.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	118	100.0%	11,761	100.0%	118	100.0%	11,761	100.0%
	HMDA Totals							
Low	135	2.3%	9,205	1.3%	542	9.3%	33,042	4.6%
Moderate	385	6.6%	29,852	4.1%	1,138	19.5%	92,104	12.8%
<i>Low/Moderate Total</i>	<i>520</i>	<i>8.9%</i>	<i>39,057</i>	<i>5.4%</i>	<i>1,680</i>	<i>28.9%</i>	<i>125,146</i>	<i>17.4%</i>
Middle	3,022	51.9%	361,876	50.2%	1,400	24.1%	139,495	19.4%
Upper	2,278	39.1%	319,845	44.4%	2,192	37.7%	302,502	42.0%
Unknown	1	0.0%	114	0.0%	549	9.4%	153,749	21.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	5,821	100.0%	720,892	100.0%	5,821	100.0%	720,892	100.0%

Peer Group HMDA Loan Distribution Table

Exam ID: The Andover Bank 2020 - 2018 & 2019 Lending Data

Selected Year: 2018

2018 OH Cleveland-Elyria MSA #17460

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0%	0	0.0%	51	7.7%	4,934	4.7%
Moderate	114	17.2%	13,189	12.6%	166	25.1%	20,761	19.8%
<i>Low/Moderate Total</i>	<i>114</i>	<i>17.2%</i>	<i>13,189</i>	<i>12.6%</i>	<i>217</i>	<i>32.8%</i>	<i>25,695</i>	<i>24.6%</i>
Middle	423	63.9%	68,223	65.2%	149	22.5%	24,346	23.3%
Upper	125	18.9%	23,226	22.2%	179	27.0%	37,298	35.6%
Unknown	0	0.0%	0	0.0%	117	17.7%	17,299	16.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	662	100.0%	104,638	100.0%	662	100.0%	104,638	100.0%
	Refinance							
Low	0	0.0%	0	0.0%	47	13.3%	4,139	9.3%
Moderate	42	11.9%	4,854	10.9%	71	20.1%	7,223	16.3%
<i>Low/Moderate Total</i>	<i>42</i>	<i>11.9%</i>	<i>4,854</i>	<i>10.9%</i>	<i>118</i>	<i>27.2%</i>	<i>11,362</i>	<i>25.6%</i>
Middle	227	64.3%	28,032	63.1%	96	27.2%	12,474	28.1%
Upper	84	23.8%	11,548	26.0%	107	30.3%	15,886	35.8%
Unknown	0	0.0%	0	0.0%	32	9.1%	4,712	10.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	353	100.0%	44,434	100.0%	353	100.0%	44,434	100.0%
	Home Improvement							
Low	0	0.0%	0	0.0%	15	13.3%	733	11.0%
Moderate	16	14.2%	1,034	15.6%	17	15.0%	897	13.5%
<i>Low/Moderate Total</i>	<i>16</i>	<i>14.2%</i>	<i>1,034</i>	<i>15.6%</i>	<i>32</i>	<i>28.3%</i>	<i>1,630</i>	<i>24.5%</i>
Middle	68	60.2%	3,798	57.2%	38	33.6%	2,410	36.3%
Upper	29	25.7%	1,808	27.2%	42	37.2%	2,575	38.8%
Unknown	0	0.0%	0	0.0%	1	0.9%	25	0.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	113	100.0%	6,640	100.0%	113	100.0%	6,640	100.0%
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	50.0%	11,900	91.9%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>1</i>	<i>50.0%</i>	<i>11,900</i>	<i>91.9%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	1	50.0%	1,050	8.1%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	2	100.0%	12,950	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	12,950	100.0%	2	100.0%	12,950	100.0%
	Other Purpose LOC							
Low	0	0.0%	0	0.0%	17	15.0%	773	11.2%
Moderate	8	7.1%	380	5.5%	25	22.1%	1,179	17.1%
<i>Low/Moderate Total</i>	<i>8</i>	<i>7.1%</i>	<i>380</i>	<i>5.5%</i>	<i>42</i>	<i>37.2%</i>	<i>1,952</i>	<i>28.3%</i>
Middle	88	77.9%	5,087	73.8%	33	29.2%	2,548	37.0%
Upper	17	15.0%	1,422	20.6%	38	33.6%	2,389	34.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	113	100.0%	6,889	100.0%	113	100.0%	6,889	100.0%
	Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	3	23.1%	180	20.2%
Moderate	1	7.7%	80	9.0%	3	23.1%	124	13.9%
<i>Low/Moderate Total</i>	<i>1</i>	<i>7.7%</i>	<i>80</i>	<i>9.0%</i>	<i>6</i>	<i>46.2%</i>	<i>304</i>	<i>34.1%</i>
Middle	7	53.8%	599	67.2%	2	15.4%	81	9.1%
Upper	5	38.5%	213	23.9%	4	30.8%	332	37.2%
Unknown	0	0.0%	0	0.0%	1	7.7%	175	19.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	13	100.0%	892	100.0%	13	100.0%	892	100.0%
	Loan Purpose Not Applicable							
Low	0	0.0%	0	0.0%	2	4.8%	192	3.8%
Moderate	3	7.1%	256	5.1%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>3</i>	<i>7.1%</i>	<i>256</i>	<i>5.1%</i>	<i>2</i>	<i>4.8%</i>	<i>192</i>	<i>3.8%</i>
Middle	31	73.8%	3,919	78.4%	0	0.0%	0	0.0%
Upper	8	19.0%	826	16.5%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	40	95.2%	4,809	96.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	42	100.0%	5,001	100.0%	42	100.0%	5,001	100.0%
	HMDA Totals							
Low	0	0.0%	0	0.0%	135	10.4%	10,951	6.0%
Moderate	185	14.3%	31,693	17.5%	282	21.7%	30,184	16.6%
<i>Low/Moderate Total</i>	<i>185</i>	<i>14.3%</i>	<i>31,693</i>	<i>17.5%</i>	<i>417</i>	<i>32.1%</i>	<i>41,135</i>	<i>22.7%</i>
Middle	845	65.1%	110,708	61.0%	318	24.5%	41,859	23.1%
Upper	268	20.6%	39,043	21.5%	370	28.5%	58,480	32.2%
Unknown	0	0.0%	0	0.0%	193	14.9%	39,970	22.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1,298	100.0%	181,444	100.0%	1,298	100.0%	181,444	100.0%

Peer Group HMDA Loan Distribution Table

Exam ID: The Andover Bank 2020 - 2017 Lending Data

Selected Year: 2017

2017 OH Nonmetropolitan

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0%	0	0.0%	94	8.4%	6,035	4.7%
Moderate	279	24.9%	27,651	21.5%	274	24.4%	24,670	19.2%
<i>Low/Moderate Total</i>	<i>279</i>	<i>34.9%</i>	<i>27,651</i>	<i>21.5%</i>	<i>368</i>	<i>32.8%</i>	<i>30,705</i>	<i>23.9%</i>
Middle	765	68.2%	89,210	69.4%	273	24.3%	30,815	24.0%
Upper	78	7.0%	11,660	9.1%	295	26.3%	47,367	36.9%
Unknown	0	0.0%	0	0.0%	186	16.6%	19,634	15.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1,122	100.0%	128,521	100.0%	1,122	100.0%	128,521	100.0%
	Refinance							
Low	0	0.0%	0	0.0%	34	6.3%	1,914	3.3%
Moderate	123	22.9%	10,670	18.6%	99	18.4%	8,496	14.8%
<i>Low/Moderate Total</i>	<i>123</i>	<i>22.9%</i>	<i>10,670</i>	<i>18.6%</i>	<i>133</i>	<i>24.7%</i>	<i>10,410</i>	<i>18.2%</i>
Middle	373	69.3%	40,863	71.5%	135	25.1%	13,343	23.6%
Upper	42	7.8%	5,666	9.9%	187	34.8%	22,984	40.1%
Unknown	0	0.0%	0	0.0%	83	15.4%	10,362	18.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	538	100.0%	57,299	100.0%	538	100.0%	57,299	100.0%
	Home Improvement							
Low	0	0.0%	0	0.0%	14	6.5%	512	4.3%
Moderate	68	31.3%	3,011	25.3%	43	19.8%	1,516	12.7%
<i>Low/Moderate Total</i>	<i>68</i>	<i>31.3%</i>	<i>3,011</i>	<i>25.3%</i>	<i>57</i>	<i>26.3%</i>	<i>2,028</i>	<i>17.0%</i>
Middle	128	59.0%	7,694	64.6%	63	29.0%	3,583	30.1%
Upper	21	9.7%	1,207	10.1%	87	40.1%	5,828	48.9%
Unknown	0	0.0%	0	0.0%	10	4.6%	471	4.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	217	100.0%	11,912	100.0%	217	100.0%	11,912	100.0%
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	25.0%	408	24.1%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>1</i>	<i>25.0%</i>	<i>408</i>	<i>24.1%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	3	75.0%	1,284	75.9%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	4	100.0%	1,692	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	1,692	100.0%	4	100.0%	1,692	100.0%

Peer Group HMDA Loan Distribution Table

Exam ID: The Andover Bank 2020 - 2017 Lending Data

Selected Year: 2017

2017 PA Erie MSA #21500

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	57	1.9%	3,329	0.8%	229	7.7%	15,848	4.0%
Moderate	198	6.7%	17,231	4.4%	615	20.7%	55,421	14.0%
<i>Low/Moderate Total</i>	<i>255</i>	<i>8.6%</i>	<i>20,560</i>	<i>5.2%</i>	<i>844</i>	<i>28.4%</i>	<i>71,269</i>	<i>18.0%</i>
Middle	1,632	55.0%	184,228	46.6%	694	23.4%	83,454	21.1%
Upper	1,081	36.4%	190,705	48.2%	1,144	38.5%	209,994	53.1%
Unknown	0	0.0%	0	0.0%	286	9.6%	30,776	7.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2,968	100.0%	395,493	100.0%	2,968	100.0%	395,493	100.0%
	Refinance							
Low	20	1.3%	1,039	0.6%	97	6.3%	6,037	3.4%
Moderate	104	6.8%	10,256	5.7%	252	16.4%	21,094	11.8%
<i>Low/Moderate Total</i>	<i>124</i>	<i>3.1%</i>	<i>11,295</i>	<i>6.3%</i>	<i>349</i>	<i>22.7%</i>	<i>27,131</i>	<i>15.2%</i>
Middle	816	53.1%	83,135	46.5%	318	20.7%	29,829	16.7%
Upper	597	38.8%	84,186	47.1%	706	45.9%	102,098	57.1%
Unknown	1	0.1%	127	0.1%	165	10.7%	19,685	11.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1,538	100.0%	178,743	100.0%	1,538	100.0%	178,743	100.0%
	Home Improvement							
Low	18	2.2%	313	0.7%	69	8.6%	1,566	3.6%
Moderate	65	8.1%	2,639	6.1%	141	17.5%	4,575	10.7%
<i>Low/Moderate Total</i>	<i>83</i>	<i>10.3%</i>	<i>2,952</i>	<i>6.8%</i>	<i>210</i>	<i>26.0%</i>	<i>6,141</i>	<i>14.3%</i>
Middle	410	50.8%	18,823	46.2%	225	27.9%	10,476	24.4%
Upper	314	38.9%	20,157	47.0%	356	44.1%	25,251	58.8%
Unknown	0	0.0%	0	0.0%	16	2.0%	1,064	2.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	807	100.0%	42,932	100.0%	807	100.0%	42,932	100.0%
	Multi-Family							
Low	2	9.5%	667	1.8%	0	0.0%	0	0.0%
Moderate	4	19.0%	586	1.6%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>6</i>	<i>28.6%</i>	<i>1,253</i>	<i>3.5%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	6	26.6%	14,864	40.4%	0	0.0%	0	0.0%
Upper	9	42.9%	20,297	56.1%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	21	100.0%	36,154	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	21	100.0%	36,154	100.0%	21	100.0%	36,154	100.0%

Peer Group HMDA Loan Distribution Table

Exam ID: The Andover Bank 2020 - 2017 Lending Data

Selected Year: 2017

2017 OH Cleveland-Elyria MSA #17460

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0%	0	0.0%	57	8.9%	5,137	5.2%
Moderate	94	14.7%	11,005	11.1%	124	19.4%	15,233	15.4%
<i>Low/Moderate Total</i>	<i>94</i>	<i>14.7%</i>	<i>11,005</i>	<i>11.1%</i>	<i>181</i>	<i>28.4%</i>	<i>20,370</i>	<i>20.6%</i>
Middle	439	68.8%	67,512	68.2%	157	24.6%	24,685	24.9%
Upper	105	16.5%	20,506	20.7%	181	28.4%	37,918	38.3%
Unknown	0	0.0%	0	0.0%	119	18.7%	16,050	16.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	638	100.0%	99,023	100.0%	638	100.0%	99,023	100.0%
	Refinance							
Low	0	0.0%	0	0.0%	26	8.7%	1,991	4.8%
Moderate	40	13.4%	5,302	12.8%	54	18.1%	5,581	13.5%
<i>Low/Moderate Total</i>	<i>40</i>	<i>13.4%</i>	<i>5,302</i>	<i>12.8%</i>	<i>80</i>	<i>26.9%</i>	<i>7,572</i>	<i>18.3%</i>
Middle	199	66.8%	26,323	63.6%	71	23.6%	8,901	21.5%
Upper	59	19.8%	9,795	23.6%	93	31.2%	16,156	39.0%
Unknown	0	0.0%	0	0.0%	54	18.1%	8,791	21.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	298	100.0%	41,420	100.0%	298	100.0%	41,420	100.0%
	Home Improvement							
Low	0	0.0%	0	0.0%	8	12.5%	604	16.4%
Moderate	9	14.1%	499	13.5%	19	29.7%	1,107	30.0%
<i>Low/Moderate Total</i>	<i>9</i>	<i>14.1%</i>	<i>499</i>	<i>13.5%</i>	<i>27</i>	<i>42.2%</i>	<i>1,711</i>	<i>46.4%</i>
Middle	42	65.6%	2,110	57.2%	13	20.3%	536	14.5%
Upper	13	20.3%	1,081	29.3%	21	32.8%	1,336	36.2%
Unknown	0	0.0%	0	0.0%	3	4.7%	107	2.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	64	100.0%	3,690	100.0%	64	100.0%	3,690	100.0%
	Multi-Family							
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%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	1	100.0%	79	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	1	100.0%	79	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	79	100.0%	1	100.0%	79	100.0%

APPENDIX F

GLOSSARY OF TERMS

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

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

Community development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

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

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

Full-scope review: Performance is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

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

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

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

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

Limited-scope review: Performance is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

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

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

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

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

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

Other products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity

include consumer loans and other loan data an institution may provide concerning its lending performance.

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

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

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

Small loan(s) to business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

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

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