PUBLIC DISCLOSURE

July 7, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Fifth Third Bank, National Association
Charter Number: 25190

38 Fountain Square Plaza
Cincinnati, OH 45263

Office of the Comptroller of the Currency
Regional and Midsize Financial Institutions
Constitution Center
400 7th Street, S.W.
Washington, DC 20219

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

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

The following table indicates the performance level of Fifth Third Bank, National Association (FTB, bank, or institution) with respect to the Lending, Investment, and Service Tests:

Performance Levels	Fifth Third Bank, National Association Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	
High Satisfactory			X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- The Lending Test rating is based on performance across all rating areas. The overall conclusions are a weighted average, based on adjusted deposits, of the seven multistate metropolitan statistical area (MMSA) and 11 state ratings. The bank's Outstanding Lending Test performance was driven by Outstanding ratings in 14 rating areas, including the four largest rating areas by deposit volume (Chicago-Naperville-Elgin, IL-IN MMSA, Cincinnati, OH-KY-IN MMSA, and the states of Ohio and Michigan).
- The Investment Test rating is based on performance across all rating areas. Examiners weighted performance in the same manner as the Lending Test. The Outstanding Investment Test performance was driven by Outstanding ratings in 17 rating areas, including the four largest rating areas by deposit volume.
- The Service Test rating is based on based on performance across all rating areas. Examiners weighted performance in the same manner as the Lending Test. The High Satisfactory Service Test performance was driven by High Satisfactory performance in eight rating areas, Outstanding performance in six rating areas, and Low Satisfactory performance in four rating areas.

Lending in Assessment Area

A high percentage of the bank's loans were in its assessment areas (AAs). The bank originated and purchased 78 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. This performance factored positively into the overall analysis of the geographic distribution of lending by income level of geography.

Table 1: Lending Inside and Outside of the Assessment Area										2022-2024
Loan Category	Number of Loans				Total #	Dollar Amount of Loans $(000s)				Total $(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		$	%	$	%	
Home Mortgage	117,969	62.44	35,247	18.66	153,216	22,434,796	56.44	10,806,744	27.19	33,241,540
Small Business	29,258	15.49	6,277	3.32	35,535	4,488,516	11.29	2,006,396	5.05	6,494,912
Small Farm	168	0.09	10	0.01	178	13,213	0.03	1,207	0.00	14,420
Total	147,395	78.02	41,534	21.98	188,929	26,936,525	67.76	12,814,347	32.24	39,750,872
Source: 1/1/2022 - 12/31/2024 Bank Data.										
Due to rounding, totals may not equal 100.0%										

Description of Institution

Fifth Third Bank, National Association (FTB, bank, or institution), headquartered in Cincinnati, Ohio, is a full-service interstate bank that is wholly owned by Fifth Third Bancorp. Fifth Third Bancorp is a diversified financial services company, also headquartered in Cincinnati, Ohio, with $212.9 billion in total assets as of December 31, 2024. Refer to appendix A for a complete list of subsidiaries, affiliates, and products considered.

FTB operates four main businesses: Commercial Banking, Branch Banking, Consumer Lending, and Wealth and Asset Management. FTB provides a wide range of financial products and services to the commercial, financial, retail, governmental, educational, energy and healthcare sectors. This includes a variety of checking, savings and money market accounts, wealth management solutions, payments and commerce solutions, securities products and services, insurance services and credit products such as commercial loans and leases, mortgage loans, credit cards, installment loans and other lending products. These products and services are delivered through a variety of channels including banking centers, other offices, telephone sales, the internet, and mobile applications.

FTB had total assets of $212.2 billion and tier 1 capital of $20.9 billion as of December 31, 2024. Loans and leases totaled $120.4 billion as of December 31, 2024, and represented 56.8 percent of total assets. The loan portfolio was comprised of $23.2 billion in real estate loans (19.3 percent), $59.1 billion in commercial loans (49 percent), $24.8 billion in individual loans (20.6 percent), $13.3 billion in other loans and leases (11 percent), and $81 million in agricultural loans (less than 1 percent).

As of December 31, 2024, FTB had a network of 1,080 branch office locations and 1,934 FTB branded Automated Teller Machines (ATMs), of which 1,504 were deposit-taking, in 11 states that included Florida, Georgia, Illinois, Indiana, Kentucky, Michigan, North Carolina, Ohio,

South Carolina, Tennessee, and West Virginia. The bank operated loan production offices in California, Texas, and Missouri. There were no mergers or acquisitions during the evaluation period. FTB expanded in the Southeast, particularly in the Carolinas, Florida, and Georgia, through de novo branching rather than bank acquisitions. This PE contains the evaluation of FTB's performance within 74 AAs in 11 states and seven MMSA rating areas.

FTB has a full-service licensed branch in Houston, Texas; however, this branch was a limited-purpose, non-public branch that serves as a physical location, required per state of Texas regulatory rules, to accept escrow deposits from certain regulated businesses (e.g., title insurance companies). Examiners did not include an analysis of the Houston-Pasadena-The Woodlands, TX MSA (Houston MSA) in this PE as this specific branch is exempt from a CRA AA evaluation and there are no other branches in the Houston MSA. The deposits assigned to this Houston branch were not included in the bank's total retail deposits, and examiners did not include these deposits when calculating an AA's pro rata share of the bank's total deposits.

There were no known legal, financial, or other factors impeding FTB's ability to help meet the credit needs within its AAs during the evaluation period. The bank had no affiliates or subsidiaries that negatively affected the bank's capacity to lend, invest, or provide banking services within its communities.

FTB received an overall Outstanding rating in its last CRA evaluation by the Office of the Comptroller of the Currency (OCC), dated July 18, 2022.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assesses the bank's CRA performance under the large institution Lending, Investment, and Service Tests. The evaluation period is January 1, 2022, through December 31, 2024. In evaluating the bank's lending performance, examiners reviewed home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA), small loans to businesses and farms reported under the CRA, and Community Development (CD) loans. Examiners also evaluated retail services, qualified investments, and CD services from January 1, 2022, through December 31, 2024. Examiners did not consider consumer loans in this evaluation, as consumer lending did not constitute a substantial majority of the bank's business and management did not request consideration.

During the evaluation period, Metropolitan Statistical Area (MSA) boundary changes introduced in July 2023, effective January 1, 2024, by the United States Office of Management and Budget (OMB) resulted in the need for additional analysis for some AAs under the Lending Test. Both the geographic and borrower distribution for those AAs affected by the OMB changes received separate analyses based on 2022 through 2023 data and 2024 data, and the data are presented separately in the tables. The Chicago-Naperville-Elgin, IL-IN-WI MMSA, Evansville, IN-KY MMSA, Tampa-St. Petersburg-Clearwater, FL MSA, Atlanta-Sandy Springs-Roswell, GA MSA, Carbondale-Marion, IL MSA, IL non-MSA, Terre Haute, IN MSA, IN non-MSA, KY non-MSA,

Lansing-East Lansing, MI MSA, Traverse City, MI MSA, MI non-MSA, Cleveland, OH MSA, Sandusky, OH MSA, and OH non-MSA AAs were affected. The rest of the bank's AAs were not affected.

Lending Test

Loan Products Evaluated

Examiners evaluated home mortgage loans, small loans to businesses, and small loans to farms in each AA. All home mortgage products were reviewed, and conclusions were reached in the aggregate. Small farm lending is not a primary product in any of the bank's AAs, and the volume of small farm lending was minimal for most of the rated areas.

Examiners did not perform a statistical analysis or draw conclusions for a loan product if the bank originated or purchased fewer than 20 loans in an AA. There was an insufficient number of small loans to farms for a meaningful analysis in all AAs except the 2022-2023 OH non-MSA AA. The volume of small farm lending was minimal for most of the rating areas. As such, the lending tables with no or a minimal number of small loans to farms were not included in Appendix D.

Lending Activity

For all rating areas, examiners evaluated the bank's lending activity by measuring the volume of the bank's lending compared to its size and resources in its AAs. For each applicable loan product in its AAs, examiners compared the bank's 2023 lending market share and rank to its deposit market share and rank to approximate the bank's lending volume relative to its size, lending capacity, and competitive environment. Examiners divided the bank's market rank by the total number of depository institutions or lenders, respectively. This approach takes into consideration the differences between the number of insured depository institutions and the number of home mortgage, small business, and small farm lenders within the AA. Examiners leveraged the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share reports to determine the bank's deposit market share and rank for AAs in which the bank operated a licensed branch.

Loan Distribution Analysis

The loan distribution analyses compared home mortgage loans, small loans to businesses, and small loans to farms to demographic and aggregate data under the applicable Lending Test components. For both home mortgage loans and small loans to businesses, examiners placed more emphasis on borrower and geographic demographic distributions than on aggregate performance. Borrower and geographic demographic comparators covered all years of the evaluation period where aggregate comparators included only data from 2022 and 2023. Aggregate data illustrates how the bank is performing relative to other lenders in the AA and provides context on the reasonableness of the bank's performance. The aggregate data for home mortgage, small loans to businesses, and small loans to farms is from 2022 and 2023 because more current data was not available when this evaluation was performed. For the AAs that

received a separate analysis for 2024, examiners concluded only on performance compared to the demographic data, as 2024 aggregate data was not available at the time of the evaluation.

Geographic and Borrower Distribution

Examiners generally gave equal weighting to geographic and borrower distribution components of the Lending Test unless performance context factors indicated examiners consider one component more than the other.

For the analysis of the bank's geographic distribution of loans, examiners generally weighted the bank's performance between low- and moderate-income geographies equally, unless otherwise noted. In certain AAs, examiners placed more emphasis on the bank's performance in low- or moderate-income geographies if warranted by limited opportunities to lend or other performance context factors. Examiners described any variations within the narrative comments of each rating area.

For the home mortgage borrower distribution analysis, examiners considered the impact that income, poverty levels, and housing costs have on limiting homeownership opportunities of low- and moderate-income individuals and families. Additionally, examiners considered the impact of home affordability for low- and moderate-income borrowers in higher cost areas when comparing the distribution of home mortgage loans to the demographics. In these higher cost markets, it is difficult for many low- and moderate-income borrowers to afford a home as the area's median housing value is typically too high for conventional mortgage loan qualifications.

When there were differences in performance between loan products in a specific AA, examiners determined the overall geographic and borrower conclusion by weighting the products based on the loan mix by number of loans over the evaluation period. Weighting by number of loans gives consideration for each lending decision regardless of the loan's dollar amount.

Community Development Loans

The lending analysis also considered the number and dollar volume of CD loans, with emphasis placed on loans that were particularly complex, innovative, or responsive to AA needs. CD lending could have a positive, neutral, or negative impact on the performance rating, which examiners described within the narrative comments. In all full-scope AAs, the bank rarely made use of innovative and/or complex CD loans. To provide perspective, examiners compared the dollar amount of CD loans to the tier 1 capital allocated to the AAs. Tier 1 capital was allocated to the rating areas and AAs based on the pro rata share of bank deposits to that area.

Examiners also considered CD lending by the bank in the broader statewide or regional area (BSRA). This included lending in the BSRA that included the AA, where the entity or activity had a purpose, mandate, or function that included serving the AA. Examiners considered BSRA activities that did not serve an AA only if the bank was responsive to community development needs and opportunities in its AAs.

Innovative or Flexible Lending Products

FTB used innovative and/or flexible lending programs to serve AA credit needs during the evaluation. The bank's innovative and flexible loan product offerings include both bank-developed and government-sponsored loan programs that help to meet the credit needs of low- and moderate-income borrowers. Although products provided through the federal or state governments are not necessarily innovative, the loan products provide flexibility to consumers and businesses seeking financing.

A summary of FTB's innovative and/or flexible loan products or programs offered throughout the bank's footprint are as follows:

The 53 Community Mortgage program offers low- and moderate-income borrowers the ability to make high loan-to-value (LTV) purchase and refinance transactions. The program offers reduced lender fees and can be combined with the 53 Down Payment Assistance (DPA) product if the subject property is in a low-income geography.

The 53 DPA program is a grant for up to $5,300 for down payment assistance and/or closing cost assistance for low-income borrowers that live in low-income census tracts. The grant is available for the purchase of a property located in Florida, Geogia, Illinois, Indiana, Kentucky, Michigan, North Carolina, Ohio, South Carolina, Tennessee, or West Virginia

The Federal Housing Administration (FHA) program allows for high LTV purchase and refinance transactions. The program allows for low down payment options, flexible sources for down payment, low minimum credit score and is aimed at borrowers who may not qualify for traditional financing. There were no area median income or property location requirements.

The Fifth Third Fast Capital program allows businesses needing quick access to capital an opportunity to apply and be approved in less than one business day. The program offers both unsecured lines of credit and term loans.

The Freddie Mac HomePossible program allows high LTV purchase and refinance transactions for borrowers whose qualifying income is at or below 80 percent of the area median income. This program also offers lower private mortgage insurance (PMI) requirements.

The Fannie Mae HomeReady product allows high LTV purchase and refinance transactions for borrowers at or below 80 percent of the area median income. This program also offers lower PMI requirements.

The Illinois Housing Development Authority (IHDA) is specific to AAs located in Illinois. The IHDA offers downpayment and closing cost assistance programs, as well as allowing high LTV purchase transactions. The programs include a forgivable assistance program, which requires a borrower to remain in the property for 10 years, a deferred program, which only requires

repayment when the home is sold or refinanced, and a repayable program, which provides a zero percent interest rate and low monthly payments.

The Indiana Housing and Community Development Authority (IHCDA) is specific to AAs located in Indiana. The IHCDA offers downpayment and closing cost assistance programs, as well as high LTV purchase transactions. The IHCDA also offers special programs for first-time homebuyers and programs for those transitioning to a new home.

The Kentucky Housing Corporation (KHC) program is specific to AAs located in Kentucky. The KHC offers downpayment and closing cost assistance programs, as well as allowing high LTV purchase transactions.

The Michigan State Housing Development Authority (MSHDA) is a program specific to AAs located in Michigan. The MSHDA offers downpayment and closing cost assistance programs, as well as high LTV purchase transactions. The MSHDA also offers deferred second mortgages to assist with downpayments and closing costs.

The North Carolina Housing program is a program specific to AAs located in North Carolina. This program is sponsored by the North Carolina Housing Finance Authority (NCHFA) and includes FHA, VA, USDA, and down payment assistance products. The program permits high LTV purchase transactions on properties at or below sales price limits established by the NCHFA and for borrowers with a household income at or below requirements established by the NCHFA.

The Ohio Housing Finance Agency (OHFA) program is specific to AAs located in Ohio. The OHFA offers downpayment and closing cost assistance programs, as well as allowing high LTV purchase transactions.

The Small Business Administration 7(a) (SBA) program provides financial help for small businesses with special requirements. These loans have a maximum loan amount of $5 million and can be used for working capital, equipment purchases, to purchase real estate, or for business acquisitions.

The SBA 7(a) Express program provides expedited financing for small businesses, with loan amounts up to $500,000.

The SBA 504 program provides long-term, fixed-rate financing for loans up to $5 million for acquiring major fixed assets, such as real estate or equipment, promote business growth, and to support job creation.

The United States Department of Agriculture/Rural Housing Services (USDA/RHS) program offers down payment assistance for purchase and 100 percent refinance transactions, in rural areas, for borrowers with household income below the area median income. The program requires an upfront fee that can be financed and monthly private mortgage insurance. The program also allows some borrowers to finance closing costs.

The Veterans Administration (VA) program offers federal mortgage loan programs to help veterans, and their families obtain home financing.

Investment Test

The analysis of qualified investments included the investment portfolio as well as donations and grants made during the evaluation period that had CD as their primary purpose. Qualified investments included investments that met the definition of CD that the bank made in the current evaluation period and those made prior to the current evaluation period that were still outstanding and continue to benefit the AA. Examiners considered prior period investments at the book value of the investment at the end of the current evaluation period and current period investments at their original investment amount. Evaluation of the bank's performance considers the number and dollar amount of investments. For full-scope areas, examiners also considered the complexity or innovativeness of the investments, the responsiveness of the investments to community needs, and the bank's demonstrated leadership.

To provide perspective regarding the relative level of qualified investments, examiners compared the dollar amount of current and prior period investments to tier 1 capital allocated to the AAs. Tier 1 capital was allocated to the rating areas and AAs based on the pro rata share of bank deposits to that area.

FTB received consideration for any qualified investment activity that benefited a specific AA in the applicable state or multistate rating area. This included investments in the BSRA that included the AA, where the entity or activity had a purpose, mandate, or function that included serving the AA. Examiners considered BSRAs that did not serve an AA only if the bank was responsive to community development needs and opportunities in its AAs.

Innovative and Complex Investments

The bank is a significant originator of Low-Income Housing Tax Credits (LIHTCs), rarely in a leadership position. During the evaluation period, the bank funded over $1.3 billion in CD investments (including grants and donations), of which the vast majority by dollar amount were comprised of LIHTCs. The bank committed to $937.7 million in LIHTC investments during the evaluation period. These investments financed the creation or preservation of 12,967 housing units, the majority of which are affordable housing for households earning less than 80 percent of the area median income. Of these LIHTC investments, the bank was in a leadership position as the sole investor for 12 projects totaling $144.4 million. These single-investor LIHTC investments are complex as they often involve participation by many parties including federal and state governments, local housing agencies, and real estate developers. Further, they require more expertise and capacity on the part of the bank in terms of sourcing projects, along with structuring, underwriting, closing, managing and ultimately divestment of the LIHTCs. The bank offers both equity and debt financing for these projects when possible.

Additionally, the bank invested in 12 properties through the purchase of New Market Tax Credits (NMTCs). The total investment through NMTCs was $47.5 million, and these investments were expected to create 3,534 permanent jobs. NMTC investments are complex as they require

specific expertise to navigate the program and involve intricate financial structures including leveraging other tax credits and government funds.

Service Test

Retail Services

For full-scope AAs, examiners evaluated the accessibility of FTB's systems for delivering financial services to their AAs, the impact of branch opening and closings, and the range of services offered across geographies of different incomes. Examiners concluded on the accessibility of bank delivery systems by assessing the geographic distribution of the bank's branches and ATMs among low-, moderate-, middle-, and upper-income geographies as of December 31, 2024, the branches located in middle- and upper income geographies that served and improved access for customers in low- and moderate-income geographies, and the availability and effectiveness of the bank's alternative delivery systems (ADS) for delivering financial services to low- and moderate-income individuals and geographies. Additionally, where the bank opened or closed branches within an AA during the evaluation period, the overall impact of the changes was evaluated. If no branches were opened or closed in an AA, examiners did not include that performance element in the analysis. For the limited-scope AAs, branch distribution and the impact of branch openings and closings were the only two factors considered in the Service Test.

Middle- and Upper-Income Adjacent Branches

In full-scope AAs, examiners considered bank branches located in middle- and upper income geographies that served and improved access for customers in low- and moderate-income geographies in one of two ways. Examiners first considered middle- or upper- income branches that are "adjacent" to (i.e. less than 1,000 feet), a low- or moderate-income geography. In certain situations, additional consideration was given to middle- and upper- income branches located in close proximity to, but greater than 1,000 feet from low- or moderate-income geographies. For these branches to be considered in the analysis, the bank had to reasonably demonstrate that the branch serves customers from low- and moderate-income geographies based on customer usage data. Specifically, the bank provided deposit household usage data for 2024 that considered branch patronage including account opening and deposit activities. The bank then assigned customers a primary branch based on the branch they utilized most frequently over the 12-month period. Examiners positively considered the middle- and upper-income proximate branches where the bank's data showed that the percentage of bank customers primarily using that branch from low- or moderate-income geographies exceeded the percent of the population that is low- or moderate-income within the AA.

Alternative Delivery Systems

In the full-scope AAs, examiners considered the availability and effectiveness of ADS for delivering retail banking services, including ATMs, online banking, and mobile banking. Bank management provided data demonstrating ADS usage (online and mobile banking) by deposit households located in low-, moderate-, middle- and upper-income geographies for the fourth

quarter of 2024 and the fourth quarter of 2021. ADS usage was measured based on three or more logins to the specific ADS per deposit household during any two of the three months of the quarter. Examiners positively considered ADS where bank data demonstrated that usage of online and/or mobile banking by deposit households located in low- and moderate-income geographies in a given AA met or exceeded the usage rate of deposit households located in middle- and upper-income geographies during the fourth quarter of 2024. Additionally, examiners considered ADS usage trends over the evaluation period and gave positive consideration when usage rates (for online or mobile banking) amongst households located in low-and moderate-income geographies increased at a rate greater than that of deposit households in middle- and upper-income geographies.

Branch Hours and Retail Products and Services

Examiners evaluated the range of services and products offered by all the bank's branches in the full-scope AAs. Examiners specifically focused on differences in branch hours, products, and services provided in low- and moderate-income geographies compared to those provided in middle- and upper-income geographies.

Branch hours and retail products and services offered at branches are generally consistent throughout the bank's AAs based on the branch type. FTB has two distinct branch types, including the Standard Banking Center branch, and Banking Mart branches located in grocery stores. As of December 31, 2024, the bank operated 1,044 Banking Center Branches and 36 Banking Marts. The majority of the Banking Marts were in the Cincinnati, OH-KY-IN MMSA AA. FTB offers the same banking products at the Banking Marts as the Banking Center branches. Drive- thru services are limited at the Banking Marts given their placement in grocery stores, while most Banking Center branches have drive-thru facilities. Hours of operation are expanded at the Banking Marts which open and close later on weekdays (10:00 a.m. to 7:00 p.m.) and offer expanded hours on Saturdays (generally 10:00 a.m. to 5:00 p.m.) as compared to the Banking Center branches, the majority of which are open from 9:00 a.m. to 5:00 p.m. Monday through Thursday, 9:00 a.m. to 6:00 p.m. on Friday and 9:00 a.m. to 12:00 p.m. on Saturdays.

Community Development Services

The bank's record of providing CD services was evaluated in AAs that received full-scope reviews. The primary consideration was the extent of CD services provided with additional consideration given to the responsiveness of FTB's CD services in meeting community needs within its AAs. Based on information provided by the bank, financial education was identified as a need across the footprint. Examiners also considered community needs identified through community contacts at the individual AA level.

Throughout the evaluation period, the bank continued to bring financial access and education services directly into low- and moderate-income and underserved communities across the bank's footprint via the Fifth Third Financial Empowerment Mobile, also known as the "eBus". The eBus, which is staffed with bank employees, is equipped with onboard computer workstations and internet connectivity. The bank coordinates eBus events with community and nonprofit organizations to allow people from the community to get assistance in a variety of areas

including social services, job fairs, financial education, and one-on-one credit counseling. Additionally, in 2024, the eBus was enhanced to allow for on-board account opening as well as access to a broad range of essential community services through the bank's collaboration with SpringFour, a social impact fintech. The bank hosted over 300 eBus events during the evaluation period that benefited over 28,000 individuals. The OCC considered the eBus to be an innovative and responsive program.

Other Information and Definitions

Assessment Areas

Examiners determined that all AAs consisted of whole geographies and met the requirements of the regulation. The areas reasonably reflected the different trade areas that FTB's branches service and did not arbitrarily exclude any low- and moderate-income areas.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage, small business, and small farm lending activity to identify any gaps in the geographic distribution of loans in all full-scope AAs. Examiners did not identify any unexplained, conspicuous gaps in the full-scope areas reviewed.

Deposit Adjustments and Allocation of Tier 1 Capital

As of June 30, 2024, FTB had total deposits of $172 billion; however, for CRA analysis purposes, examiners excluded a total of $8.3 billion in non-retail deposits that were held in multiple AAs. The adjusted deposits were used to calculate the bank's total deposits and the bank's pro rata share in each AA and then used to allocate tier 1 capital to the rating areas and AAs.

Total deposits were adjusted for the following AAs: Charlotte-Concord-Gastonia, NC-SC MMSA, Chicago-Naperville-Elgin, IL-IN MMSA, Cincinnati-OH-KY-IN MMSA, Jacksonville, FL MSA, Naples-Marco Island, FL MSA, Atlanta-Sandy Springs-Roswell, GA MSA, Indianapolis-Carmel-Greenwood, IN MSA, Evansville, IN MSA, Lexington-Fayette, KY MSA, Detroit-Warren-Dearborn, MI MSA, Grand Rapids-Wyoming-Kentwood, MI MSA, Traverse City, MI MSA, Columbus, OH MS, Cleveland, OH MSA, Toledo, OH MSA, and Nashville-Davidson-Murfreesboro-Franklin, TN MSA.

The Charlotte-Concord-Gastonia, NC-SC MSA AA and the Evansville, IN-KY MMSA AA were evaluated from January 1, 2022, through December 31, 2023. For these two AAs, examiners used deposits as of June 30, 2023, and tier 1 capital as of December 31, 2023. The pro rata shares for these two areas were then used to allocate tier 1 capital to the AAs for analysis purposes.

Deposit Market Share

Examiners used summary deposit data reported to the FDIC as of June 30, 2024, unless otherwise noted. This was the most recent public data available during the evaluation period.

Unemployment Rate

The unemployment rates referenced are the MSA non-seasonally adjusted rate as published monthly by the U.S. Bureau of Labor Statistics (BLS).

Community Contacts

Examiners reviewed and considered community contacts available to the OCC, FDIC, and Board of Governors of the Federal Reserve System made during the evaluation period with community groups, local government representatives, realtors, and business leaders within the various AAs. Community contacts were utilized to ascertain the AA's credit needs, demographics, and economic conditions. Applicable community contacts are referenced in each AA that received a full-scope review. The community contacts indicated that affordable housing, small business financing, and financial education continued to be the primary credit and CD needs in many AAs.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same MSA, MMSA, or combined statistical area (CSA), if applicable are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope of Evaluation" section under each State Rating section for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

When determining areas for full-scope reviews, examiner considered factors such as FTB's percentage of deposits within the rating area; business strategy within a particular MMSA or state; the number of branches; the volume of reportable loans originated and purchased in each state and/or MMSA; the significance of the bank to the AA based on its deposit market share and rank; comments received from the public; and conclusions from prior CRA evaluations. Where necessary, examiners selected multiple AAs to complete full-scope analyses to support the conclusions and ratings.

Ratings

The bank's overall rating is a blend of the state ratings, and, where applicable, multistate ratings.

The Chicago-Naperville-Elgin, IL-IN MMSA, Cincinnati, OH-KY-IN MMSA, and the states of Ohio and Michigan carried the greatest weight in the overall conclusions. These areas represented 69.6 percent of FTB's deposits.

The MMSA and state ratings in rating areas with a single AA are based on performance in that AA. The MMSA and state ratings in rating areas with multiple AAs are based on the combination of conclusions in those AAs. Refer to the "Scope of Evaluation" section under each MMSA and State Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) (March 29, 2024) in determining a national bank's or federal savings association's (collectively, bank's) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

Multistate Metropolitan Statistical Area Rating

Charlotte-Concord-Gastonia, NC-SC MMSA (Charlotte MMSA)

CRA rating for the Charlotte MMSA[1]**:** Outstanding
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited an excellent geographic distribution of loans in its AA.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank was a leader in making CD loans, which further supported the Lending Test rating.
- The bank had an excellent level of qualified CD investment and grants which were responsive in addressing community needs.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA.
- The bank provided a relatively high level of CD services. CD services were responsive in addressing community needs.

Description of Institution's Operations in the Charlotte MMSA

The Charlotte MMSA AA is comprised of a portion of the Charlotte MMSA that includes six counties in North Carolina and one county in South Carolina. Refer to the table in appendix A for a list of counties reviewed.

As of year-end 2024, the bank operated 44 branches and 53 deposit-taking ATMs in this rating area. The bank had $5.6 billion in adjusted deposits in this rating area, which represented 3.4 percent of the bank's total adjusted deposits. This rating area was the bank's seventh largest in terms of deposits held. During the evaluation period, the bank made $336.3 million or 1.2 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

[1] MMSA ratings reflect performance within the multistate metropolitan statistical area. Statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked fourth out of 44 FDIC-insured depository institutions with a 1.3 percent deposit market share in this rating area. The top three competitors had 94.5 percent of the market share and included Bank of America, N.A. with 39 branches and 72.6 percent deposit market share, Truist Bank with 53 branches and 15.7 percent deposit market share, and Wells Fargo, N.A. with 57 branches and 6.2 percent deposit market share.

Charlotte MMSA AA

The following table provides a summary of the demographics, including housing and business information, for the Charlotte MMSA AA.

Assessment Area - 2024 Charlotte MMSA						
						2024
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	517	5.22	27.47	29.79	35.59	1.93
Population by Geography	2,095,947	4.22	27.06	32.11	35.73	0.87
Housing Units by Geography	832,106	4.52	28.47	31.49	34.49	1.03
Owner-Occupied Housing by Geography	496,228	2.14	24.23	33.31	39.86	0.47
Occupied Rental Units by Geography	267,716	8.58	35.26	28.55	25.77	1.83
Vacant Units by Geography	68,162	5.96	32.60	29.78	29.67	1.99
Businesses by Geography	126,346	4.47	25.00	28.06	40.69	1.77
Farms by Geography	3,618	2.76	26.48	37.87	32.37	0.53
Family Distribution by Income Level	506,741	20.85	17.45	19.46	42.24	0.00
Household Distribution by Income Level	763,944	22.05	16.58	17.90	43.48	0.00
Unemployment rate (%)	4.98	8.65	6.71	4.74	3.58	1.41
Households Below Poverty Level (%)	10.14	27.14	15.52	8.69	4.76	18.54
Median Family Income (16740 - Charlotte-Concord-Gastonia, NC-SC MSA)		$80,486	**Median Housing Value**			$209,400
Median Family Income (16740 - Charlotte-Concord-Gastonia, NC-SC MSA) for 2024		$100,300	**Median Gross Rent**			$1,112
			Families Below Poverty Level			7.85
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

In the performance context, examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MMSA median housing value would be $1,124. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Based on the 2024 median family income, the calculated maximum affordable monthly mortgage payment was $1,254 for a low-income borrower and $2,006 for a

moderate-income borrower. Based on these calculations, housing was affordable for both low- and moderate-income borrowers. Community contacts (see below) noted affordable housing continues to be a community need despite these calculations.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For this AA, 7.9 percent of families were living below the poverty level.

Economic Data

Data from the November 2024 Moody's Analytics report indicates the Charlotte metro economy is in the late expansion part of the business cycle. Payroll growth is higher than the state and nation. Healthcare, leisure/hospitality, and public sector jobs are driving this growth, offsetting weaknesses in transportation/warehousing and manufacturing. Although unemployment increased slightly from 2023 to 2024, it remains below the state and national average. The Charlotte metro is a banking hub, with financial services payrolls that place it fourth among the top 25 largest metro areas and divisions. Additionally, although healthcare employment is over 12 percent higher than the pre-pandemic peak, it has not kept pace with robust population gains. Major employers include Atrium Health, Wells Fargo & Co., Bank of America Corp., American Airlines Group, and Novant Health Inc. House prices modestly appreciated, more so than the state and national average, and single-family building permits recovered in the latter part of 2024. Area strengths include an increasing tech presence that attracts new workers and investments, favorable demographic trends including strong net migration, and low business costs coupled with a highly skilled workforce. Weaknesses include the overvaluing of single-family housing stock as well as a leveling-off of new building.

According to the BLS, the non-seasonally adjusted unemployment rate for the Charlotte MMSA was 3.7 percent as of January 2024 and decreased to 3.4 percent as of December 2024. The national unemployment rate was 3.9 percent as of December 2024.

Community Contacts

Examiners reviewed information from two community contact interviews conducted during the evaluation period. One contact was with a community development organization, and the other was a community services organization. The primary needs center on access to affordable housing, capital for small businesses, and meaningful community engagement from financial institutions. One contact indicated the West Charlotte neighborhood is undergoing gentrification, leading to rising property values and taxes that are putting financial pressure on long-term residents, especially seniors on fixed incomes. Both contacts discussed the need for flexible lending programs to help seniors and low-income residents with home repair assistance and support to help them remain in their homes. These sources identified the following needs and opportunities within the community:

- Access to affordable housing
- Grants, donations, and low-interest rate loans for nonprofit organizations

- Increased financial literacy programs for all age groups, particularly youth and seniors
- Financing for affordable housing projects, including more flexible and longer-term financing options for developers
- Flexible and accessible mortgage products for low- and moderate-income households
- Enhanced partnerships with nonprofits, including board participation
- Small business development and support
- Home repair assistance for seniors and low-income homeowners
- Workforce development, including job training, internships, and hiring local youth
- Access to basic banking services in underserved neighborhoods
- Programs and funding to address food insecurity and basic needs

Scope of Evaluation in the Charlotte MMSA

Examiners conducted a full-scope review of the Charlotte MMSA AA. Examiners placed more emphasis on home mortgage loans than small loans to businesses in arriving at the overall conclusion as they represented the majority of lending in the AA. The bank originated or purchased too few small loans to farms in this rating area to conduct a meaningful analysis.

On September 26, 2023, FTB opened a branch in Lancaster County, South Carolina, which created the Charlotte MMSA AA. Due to the timing of the branch opening, an analysis of the Charlotte MMSA AA was performed only for 2024. Prior to this branch opening, FTB operated only in the North Carolina portion of the MSA, and an analysis of the Charlotte MSA AA for 2022-2023 is included in the state of North Carolina. Investments made prior to the current evaluation that were still outstanding were included in the Charlotte MMSA AA tables and analysis.

On December 18, 2024, FTB opened a branch in York County, South Carolina. York County will not be included in the AA or evaluation because the bank entered this county less than six months before the end of the evaluation period and the analysis would not be meaningful.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CHARLOTTE MMSA

LENDING TEST

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

Based on a full-scope review, the bank's performance in the Charlotte MMSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Table 3: Lending Activity								2024
Number of Loans								
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Consumer**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Charlotte MMSA	1,079	438	2	13	-	1,532	100.00	100.00
Broader Statewide or Regional Area	0	0	0	0	-	0	NA	NA
Total	**1,079**	**438**	**2**	**13**	**-**	**1,532**	**100.00**	**100.00**
Dollar Volume of Loans ($000s)								
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Consumer**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Charlotte MMSA	278,599	57,399	330	57,812	-	394,140	100.00	100.00
Broader Statewide or Regional Area	0	0	0	0	-	0	NA	NA
Total	**278,599**	**57,399**	**330**	**57,812**	**-**	**394,140**	**100.00**	**100.00**
Source: 1/1/2024 - 12/31/2024 Bank Data.								
Due to rounding, totals may not equal 100.0%								

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked fourth out of 44 FDIC-insured depository institutions (top 9 percent) with a 1.3 percent deposit market share.

For home mortgage loans, the bank's market share of 1.5 percent ranked 16th out of 760 lenders (top 3 percent). The top three lenders were State Employees' Credit Union with 6.7 percent market share, Rocket Mortgage with 4.9 percent market share, and Bank of America, N.A. with 4.1 percent market share.

For small loans to businesses, the bank's market share of 0.6 percent ranked 18th out of 168 lenders (top 11 percent). The top three lenders were American Express National Bank with 25.4 percent market share, JPMorgan Chase Bank, N.A. with 13.3 percent market share, and Bank of America, N.A. with 12.3 percent market share. These top small business lenders were institutions with large business credit card portfolios with average loan sizes of $14,000 or less. FTB's average small business loan size was $142,000.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA. The geographic distribution of both home mortgage loans and small loans to businesses was excellent.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans was excellent. The percentage of home mortgage loans originated or purchased in low-income geographies exceeded the percentage of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in moderate-income geographies exceeded the percentage of owner-occupied housing units located in those geographies.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was excellent. The percentage of small loans to businesses originated or purchased in low-income geographies exceeded the percentage of businesses located in those geographies. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded the percentage of businesses located in those geographies.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AA. Examiners did not identify any unexplained conspicuous gaps in the full-scope area reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses of different sizes. The distribution of home mortgage loans was good and the distribution of loans to businesses of different sizes was adequate.

Home Mortgage Loans

Refer to Table 8 in the MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was good. The percentage of home mortgage loans originated or purchased to low-income borrowers was well below the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded the percentage of those families in the AA.

Small Loans to Businesses

Refer to Table 10 in the MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was adequate. The percentage of loans to small businesses originated or purchased was below the percentage of small businesses in the AA.

Community Development Lending

The institution was a leader in making CD loans, which further supported the Lending Test rating.

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

The level of CD lending was excellent. During the evaluation period, FTB originated 13 CD loans totaling $57.8 million or 8 percent of allocated tier 1 capital. By dollar volume, 74.2 percent funded economic development, 20.6 percent funded affordable housing, and 5.2 percent funded community services. CD loans were responsive to identified community needs including affordable housing and economic development. The following is an example of a CD loan the bank originated or purchased in the MMSA:

- A $9.5 million equity bridge loan to finance the construction of a 48-unit LIHTC affordable housing development for seniors. All units were restricted to tenants earning up to 80 percent of the area median income. Further, the bank demonstrated a multifaceted approach by also making a $10 million investment.

Product Innovation and Flexibility

The institution used innovative and/or flexible lending practices in order to serve AA credit needs. The bank originated or purchased 189 loans under its flexible lending programs totaling $34.8 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for details regarding the programs offered.

INVESTMENT TEST

The institution's performance under the Investment Test in the Charlotte MMSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Charlotte MMSA AA was excellent.

Number and Amount of Qualified Investments

Table 4: Qualified Investments										
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Charlotte MMSA	13	36,471	8	10,184	21	100.00	46,655	100.00	0	0
Broader Statewide or Regional Area	0	0	0	0	0	0	0	0	0	0
Total	13	36,471	8	10,184	21	100.00	46,655	100.00	0	0

The institution had an excellent level of qualified investments, including grants, but not in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current and prior period investments represented 6.5 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community development needs. Investments were particularly responsive to affordable housing needs. The institution did not use innovative and/or complex investments to support CD initiatives. By dollar volume during the current period, 98.4 percent of total investments and grants supported affordable housing, 1.4 percent supported community services to low- and moderate-income individuals, and 0.2 percent promoted economic development. The following are examples of qualified investments in the MMSA:

- The bank made one $10 million investment in a multi-investor LIHTC fund for the construction of a 48-unit affordable senior housing development, where 13 units are restricted to 30 percent of the area median income, seven units are restricted to 50 percent of the area median income, and 28 units are restricted to 60 percent of the area median income. Further, the bank demonstrated a multifaceted approach by also providing $9.5 million in bridge financing.

- There were 13 responsive investments made by the bank prior to 2022 which had a remaining book value of $36.5 million. All 13 of these investments were for affordable housing, and 12 of the 13 were LIHTC investments.

SERVICE TEST

The institution's performance under the Service Test in the Charlotte MMSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Charlotte MMSA AA was excellent.

Retail Banking Services

Table 5: Distribution of Branch Delivery Systems														2024
Assessment Area	Deposits	Branches							Population					
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography					
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA	
2024 Charlotte MMSA	100.00	44	100.00	6.82	25.00	15.91	52.27	0.00	4.22	27.06	32.11	35.73	0.87	
Total	100.00	44	100.00	6.82	25.00	15.91	52.27	0.00	4.22	27.06	32.11	35.73	0.87	

Source: FFIEC File - 2024 Census
1/1/2024 - 12/31/2024 Bank Data
Due to rounding, totals may not equal 100.0%
**# of Bank Branches does not include branch opened in December 2024 in York County SC*

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income geographies exceeded, and in moderate-income geographies approximated, the percentage of the population living within those geographies.

The bank had several ADS including ATMs, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers and were positively considered in the service delivery systems conclusion. The bank had 56 ATMs in the AA, 53 of which were deposit-taking. Per data provided by the bank, as of the end of the evaluation period, bank customers located in low- and moderate-income geographies used online banking at a rate (42.8 percent) less than customers in middle- and upper-income geographies (50.9 percent), while mobile banking usage rates amongst customers in low- and moderate-income geographies (60.7 percent) were comparable to those of customers in middle- and upper-income geographies (60.3 percent). Given that this is a new rating area for 2024, ADS usage trends over the evaluation period were not considered.

Table 6: Distribution of Branch Openings/Closings								
Branch Openings/Closings								
Assessment Area	# of Branch Openings*	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Charlotte MMSA	2	3	1	0	-1	-1	0
Total	2	3	1	0	-1	-1	0

1/1/2024 - 12/31/2024 Bank Data.
**Branch openings include one branch opened in Lancaster County SC in September 2023 which created the MMSA rating area for 2024.*
**Branch openings do not include one branch opened in York County SC in December 2024.*

To the extent changes have been made, the institution's opening and closing of branches improved the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During 2024, the bank closed three branches, none of which were in low- or moderate-income geographies. The branch closures were a result of lease expirations on two branches where the bank decided not to renew the lease, along with branch customer overlap, and low productivity for one branch. The bank also opened two branches in the AA in 2024, one of which was in a low-income geography.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced, the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. Average hours of operation were comparable between the low- and moderate-income branches and the middle- and upper-income branches. All branches generally had the same lobby hours of 9:00 a.m. to 5:00 p.m. Monday through Thursday, and 9:00 a.m. to 6:00 p.m. on Friday. Of the 44 branches, 37 were open on Saturday from 9:00 a.m. to 12:00 p.m. or 9:00 a.m. to 1:00 p.m., including all three low-income branches, and 10 of the 11 moderate-income branches. There were 35 locations with drive-thru facilities, 12 of which were in low- or moderate-income geographies.

Community Development Services

The institution provided a relatively high level of CD services. During 2024, bank employees provided 413 hours of qualified CD service activities to 13 organizations within this AA. Leadership is evident through board or committee participation, with six employees providing 212 service hours during 2024. Additionally, the bank hosted four eBus events during 2024 in the Charlotte MMSA benefiting 1,181 individuals. The bank's assistance was responsive to identified needs in the AA, particularly with board participation and financial literacy programs. Service activity examples during 2024 include:

- A senior vice president at the bank provided 51 hours of service on the board of the local chapter of a nationwide affordable housing advocacy organization.

- A senior vice president at the bank serves as the chair of an advisory board for a nonprofit organization that works to connect communities with resources in the areas of affordable housing, economic development, and community services. During 2024, the officer provided 53 service hours.

- The bank hosted an eBus event at a local university located in a low-income area that benefited 120 individuals. Additionally, five bank employees separately provided 35 hours of financial education at the university that focused on raising awareness about credit reports and identity theft risk. Through this event, bankers, along with U.S. Department of Housing and Urban Development (HUD) agency credit counselors, also helped review credit reports with students.

Chicago-Naperville-Elgin, IL-IN MMSA (Chicago MMSA)

CRA rating for the Chicago MMSA[2]: Outstanding
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AA.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments and grants which were responsive in addressing community needs.
- Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AA with consideration for middle- and upper-income adjacent branches and ADS.
- The bank provided an adequate level of CD services. CD services were responsive in addressing community needs.

Description of Institution's Operations in the Chicago MMSA

The Chicago MMSA AA is comprised of a portion of the Chicago MMSA that includes eight counties in Illinois and three counties in Indiana. Refer to the table in appendix A for a list of counties reviewed.

As of year-end 2024, the bank operated 167 branches and 215 deposit-taking ATMs in this rating area. The bank had $27.9 billion in adjusted deposits in this rating area, which represented 17.1 percent of the bank's total adjusted deposits. This rating area was the bank's second largest in terms of deposits held. During the evaluation period, the bank made $4.4 billion or 16.3 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

[2] MMSA ratings reflect performance within the multistate metropolitan statistical area. Statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked sixth out of 152 FDIC-insured depository institutions with a 4.9 percent deposit market share in this rating area. The top three competitors had 46.3 percent of the market share and included JPMorgan Chase Bank, N.A. with 269 branches and 20 percent deposit market share, BMO Bank, N.A. with 182 branches and 18.3 percent deposit market share, and Bank of America, N.A. with 121 branches and 8 percent deposit market share.

Chicago MMSA AA

The following tables provide a summary of the demographics, including housing and business information, for the Chicago MMSA AA for each evaluation period.

Assessment Area - 2022-2023 Chicago MMSA						
						2022 - 2023
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	2,278	11.72	22.74	32.09	31.96	1.49
Population by Geography	9,382,988	8.71	22.25	34.47	33.92	0.65
Housing Units by Geography	3,758,050	9.25	21.91	34.32	33.92	0.60
Owner-Occupied Housing by Geography	2,237,406	4.44	18.06	37.47	39.70	0.33
Occupied Rental Units by Geography	1,221,064	15.50	27.90	30.35	25.25	0.99
Vacant Units by Geography	299,580	19.68	26.25	26.96	26.11	1.01
Businesses by Geography	377,877	5.74	16.58	32.58	44.57	0.52
Farms by Geography	8,117	4.00	16.69	39.57	39.32	0.41
Family Distribution by Income Level	2,228,455	22.81	16.65	19.33	41.21	0.00
Household Distribution by Income Level	3,458,470	25.20	15.35	16.97	42.48	0.00
Unemployment rate (%)	6.17	15.02	8.33	5.26	3.87	8.65
Households Below Poverty Level (%)	11.28	30.18	15.71	9.12	5.90	27.58
Median Family Income (16984 - Chicago-Naperville-Schaumburg, IL MD)		$92,622			**Median Housing Value**	$235,150
Median Family Income (20994 - Elgin, IL MD)		$97,326			**Median Gross Rent**	$1,140
Median Family Income (23844 - Gary, IN MD)		$75,625			**Families Below Poverty Level**	8.18
Median Family Income (29404 - Lake County, IL MD)		$105,876				
Median Family Income (16984 - Chicago-Naperville-Schaumburg, IL MD) for 2023		$109,800				
Median Family Income (20994 - Elgin, IL MD) for 2023		$113,500				
Median Family Income (23844 - Gary, IN MD) for 2023		$91,900				
Median Family Income (29404 - Lake County, IL MD) for 2023		$124,600				
FFIEC File - 2020 Census						
2023 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

Assessment Area - 2024 Chicago MMSA						
						2024
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	2,278	11.90	22.87	31.87	31.87	1.49
Population by Geography	9,382,988	8.90	22.51	34.17	33.76	0.65
Housing Units by Geography	3,758,050	9.47	22.16	34.00	33.78	0.60
Owner-Occupied Housing by Geography	2,237,406	4.54	18.49	37.14	39.50	0.33
Occupied Rental Units by Geography	1,221,064	15.93	27.85	30.04	25.19	0.99
Vacant Units by Geography	299,580	19.91	26.41	26.62	26.05	1.01
Businesses by Geography	368,288	5.79	17.02	32.59	44.11	0.50
Farms by Geography	7,804	4.18	17.54	39.68	38.31	0.28
Family Distribution by Income Level	2,228,455	22.95	16.72	19.35	40.98	0.00
Household Distribution by Income Level	3,458,470	25.35	15.41	17.00	42.23	0.00
Unemployment rate (%)	6.17	14.81	8.27	5.27	3.86	8.65
Households Below Poverty Level (%)	11.28	29.98	15.51	9.09	5.90	27.58
Median Family Income (16984 - Chicago-Naperville-Schaumburg, IL MD)		$92,622		**Median Housing Value**		$235,150
Median Family Income (20994 - Elgin, IL MD)		$97,326		**Median Gross Rent**		$1,140
Median Family Income (29404 - Lake County, IL MD)		$112,326		**Families Below Poverty Level**		8.18
Median Family Income (29414 - Lake County-Porter County-Jasper County, IN MD)		$75,625				
Median Family Income (16984 - Chicago-Naperville-Schaumburg, IL MD) for 2024		$109,800				
Median Family Income (20994 - Elgin, IL MD) for 2024		$113,700				
Median Family Income (29404 - Lake County, IL MD) for 2024		$129,600				
Median Family Income (29414 - Lake County-Porter County-Jasper County, IN MD) for 2024		$91,100				
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

In the performance context, examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MMSA median housing value would be $1,262. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Based on the 2023 and 2024 median family income, respectively, the calculated maximum affordable monthly mortgage payment was between $1,149 and $1,558 and $1,139 and $1,620 for a low-income borrower and between $1,838 and $2,492 and $1,822 and $2,592 for a moderate-income borrower, depending on the Metropolitan Division (MD). Based on these calculations, housing was affordable for most low-income borrowers and is affordable for moderate-income borrowers. Community contacts (see below) noted affordable housing continues to be a community need despite these calculations.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For this AA, 8.2 percent of households were living below the poverty level.

Economic Data

Data from the November 2024 Moody's Analytics report indicates the Chicago metro is in the recovery part of the business cycle and trails large metro peers and the nation overall. Payroll employment has stagnated over the past 18 months, with minimal growth in financial, professional/business services, and other industries. Healthcare leads in job creation but is softening. Despite an expanding labor force, the unemployment rate has increased, and local wage growth lags the national average. The metro is an air and rail hub, having an above-average concentration of transportation/warehousing employment. Major employers include Amazon.com Inc., Advocate Health Care System, Northwestern Memorial Healthcare, University of Chicago, and Walgreens Boots Alliance Inc. Area strengths include being a major center for business, distribution, transportation, and finance, having a huge talent pool with a strong roster of well-regarded educational institutions, and a budding high-tech center. Weaknesses include state and local budget pressures, weak population trends, and a high crime rate.

According to the BLS, the non-seasonally adjusted unemployment rate for the Chicago MMSA was 5.1 percent as of January 2022 and decreased to 4.5 percent as of December 2024. The national unemployment rate was 3.9 percent as of December 2024.

Community Contacts

Examiners reviewed information from nine community contact interviews conducted during the evaluation period. The contacts represented organizations focused on affordable housing, small business and economic development, and community services. One of the contacts was a nonprofit Community Development Financial Institution (CDFI). Community organization leaders highlighted persistent gaps in banking services and support for low-income, minority, and underserved groups. Two contacts discussed the lack of affordable housing, the increasing price of homes, and the lack of housing inventory. Key themes included access to capital, affordable housing, financial literacy, and strategic partnerships with banks. These sources identified the following needs and opportunities within the community:

- Affordable housing
- Access to small-dollar business loans (under $100,000) and startup capital
- Investments in loan pools
- Partnering with CDFIs and nonprofits to support underserved entrepreneurs
- Expansion of affordable mortgage products, including flexible underwriting using alternative credit data
- Access to bilingual banking products and support

- Leverage community land trusts to create long term affordable housing
- Financial literacy and education focused on credit building and budgeting
- Support for down payment assistance and matching savings programs, especially for first-time homebuyers
- Bank branches in underserved communities
- Flexible consumer lending and microloan products, especially those excluded by conventional credit systems

Scope of Evaluation in the Chicago MMSA

Examiners conducted a full-scope review of the Chicago MMSA AA. Examiners placed more emphasis on home mortgage loans than small loans to businesses in arriving at the overall conclusion as they represented the majority of lending in the AA. The bank originated or purchased too few small loans to farms in this rating area to conduct a meaningful analysis.

FTB's delineated AA did not change during the evaluation period; however, the MD boundaries within the Chicago MMSA changed in 2024, which resulted in the need for two separate analyses for this AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CHICAGO MMSA

LENDING TEST

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

Based on a full-scope review, the bank's performance in the Chicago MMSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Table 3: Lending Activity								2022 - 2024
Number of Loans								
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Consumer**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Chicago MMSA	13,725	6,295	4	137	-	20,161	100.00	100.00
Broader Statewide or Regional Area	0	0	0	0	-	0	NA	NA
Total	**13,725**	**6,295**	**4**	**137**	**-**	**20,161**	**100.00**	**100.00**
Dollar Volume of Loans ($000s)								
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Consumer**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**

Chicago MMSA	3,226,297	1,156,548	135	591,790	-	4,974,770	100.00	100.00
Broader Statewide or Regional Area	0	0	0	0	-	0	NA	NA
Total	**3,226,297**	**1,156,548**	**135**	**591,790**	**-**	**4,974,770**	**100.00**	**100.00**
Source: 1/1/2022 - 12/31/2024 Bank Data.								
Due to rounding, totals may not equal 100.0%								

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked sixth out of 152 FDIC-insured depository institutions (top 4 percent) with a 4.9 percent deposit market share.

For home mortgage loans, the bank's market share of 1.8 percent ranked 13th out of 913 lenders (top 2 percent). The top three lenders were Guaranteed Rate, Inc. with 6.2 percent market share, US Bank, N.A. with 5.4 percent market share, and JPMorgan Chase Bank, N.A. with 4.5 percent market share.

For small loans to businesses, the bank's market share of 0.8 percent ranked 12th out of 261 lenders (top 5 percent). The top three lenders were JPMorgan Chase Bank, N.A. with 30.8 percent market share, American Express National Bank with 22.1 percent market share, and Citibank, N.A. with 6.9 percent market share. These top small business lenders were institutions with large business credit card portfolios with average loan sizes of $15,000 or less. FTB's average small business loan size was $178,000.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. The geographic distribution of home mortgage loans was good and the geographic distribution of small loans to businesses was excellent.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans was good.

2022-2023

The geographic distribution of home mortgage loans during the 2022-2023 analysis period was adequate. The percentage of home mortgage loans originated or purchased in low-income geographies was well below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies was below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

2024
The geographic distribution of home mortgage loans during the 2024 analysis period was excellent. The percentage of home mortgage loans originated or purchased in low-income geographies was near to the percentage of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in moderate-income geographies exceeded the percentage of owner-occupied housing units located in those geographies.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was excellent.

2022-2023
The geographic distribution of small loans to businesses during the 2022-2023 analysis period was excellent. The percentage of small loans to businesses originated or purchased in low-income geographies was below the percentage of businesses located in those geographies but exceeded the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies approximated both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

2024
The geographic distribution of small loans to businesses during the 2024 analysis period was excellent. The percentage of small loans to businesses originated or purchased in low-income geographies exceeded the percentage of businesses located in those geographies. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded the percentage of businesses located in those geographies.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AA. Examiners did not identify any unexplained conspicuous gaps in the full-scope area reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses of different sizes. The distribution of both home mortgage loans and loans to businesses of different sizes was good.

Home Mortgage Loans

Refer to Table 8 in the MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was good.

2022-2023
The distribution of home mortgage loans during the 2022-2023 analysis period was good. The percentage of home mortgage loans originated or purchased to low-income borrowers was well below the percentage of those families in the AA but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate percentage of all reporting lenders.

2024
The distribution of home mortgage loans during the 2024 analysis period was good. The percentage of home mortgage loans originated or purchased to low-income borrowers was well below the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded the percentage of those families in the AA.

Small Loans to Businesses

Refer to Table 10 in the MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was good.

2022-2023
The distribution of loans during the 2022-2023 analysis period was good. The percentage of loans to small businesses originated or purchased was below the percentage of small businesses in the AA but exceeded the aggregate percentage of all reporting lenders.

2024
The distribution of loans during the 2024 analysis period was adequate. The percentage of loans to small businesses originated or purchased was below the percentage of small businesses in the AA.

Community Development Lending

The institution was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.

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

The level of CD lending was excellent. During the evaluation period, FTB originated 137 CD loans totaling $591.8 million or 16.6 percent of allocated tier 1 capital. By dollar volume, 65.5 percent funded economic development, 14.7 percent funded affordable housing, 11.6 percent funded revitalization and stabilization efforts, and 8.2 percent funded community services. CD loans were responsive to identified community needs including affordable housing and economic development. The following are examples of CD loans the bank originated or purchased in the MMSA:

- A $5.7 million construction loan to finance the development of a 40-unit LIHTC project. The supportive apartment community includes one-bedroom units targeting persons with disabilities and mental illness and includes community amenities, on-site administration and programmatic social services.

- A $7.3 million construction loan to finance the new construction of a 36-unit LIHTC project. This townhome development will contain units for families earning at or below 80 percent of the area median income.

- A $13.5 million loan to finance an innovative 80-unit development, which consists of 36 market rate and 44 affordable units, which provides much needed clean, safe, and transit-oriented housing on Chicago's Southside. The project was awarded LIHTC funds pursuant to the former Mayor Invest Southwest Initiative. The project is a mixed-income property Equitable Transit Oriented Development (ETOD) and serves to deconcentrate low- and moderate-income households. The high level of market units in the project reduces the amount of LIHTC equity that would otherwise be available in a 100 percent affordable project. An additional subsidy was required from the City of Chicago.

Product Innovation and Flexibility

The institution used innovative and/or flexible lending practices in order to serve AA credit needs. The bank originated or purchased 2,559 loans under its flexible lending programs totaling $386 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for details regarding the programs offered.

INVESTMENT TEST

The institution's performance under the Investment Test in Chicago MMSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Chicago MMSA AA was excellent.

Number and Amount of Qualified Investments

Table 4: Qualified Investments										
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Chicago MMSA	85	140,529	204	290,490	289	100.00	431,019	100.00	1	2,500
Broader Statewide or Regional Area	0	0	0	0	0	0	0	0	0	0
Total	85	140,529	204	290.490	289	100.00	431,019	100.00	1	2,500

The institution had an excellent level of qualified investments, including grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current and prior period investments (excluding unfunded commitments) represented 12.1 percent of allocated tier 1 capital.

The institution exhibited good responsiveness to credit and community development needs. The institution rarely used innovative and/or complex investments to support CD initiatives. By dollar volume during the current period, 63.4 percent of total investments and grants supported affordable housing, 35.7 percent promoted economic development, 0.8 percent supported community services to low- and moderate-income individuals, and 0.1 percent funded revitalization and stabilization efforts. The following are examples of qualified investments in the MMSA:

- The bank, in a leadership position, made a complex $22.2 million investment in a single investor LIHTC fund for a new transit-oriented housing development where 44 of the 80 units were affordable housing. This investment was also innovative, as the bank made the investment through a proprietary fund even though the composition of units meant that the broader LIHTC market was not supportive. The bank demonstrated a multifaceted approach by also providing $13.5 million in financing.

- The bank made a complex $12.8 million New Market Tax Credit investment to support economic development through a manufacturing innovation accelerator. The investment funded the acquisition and renovation of a facility, which created 63 construction jobs and is anticipated to support 750 to 800 member companies over seven years. The investment responded to the bank-identified community need for access to capital for small businesses.

- The bank made a $2.5 million investment to support an economic development organization that provided access to capital for small business owners through micro loans. In 2024 over 8,600 small businesses were served. This investment responded to the community-identified need for access to small business loans and startup capital.

SERVICE TEST

The institution's performance under the Service Test in the Chicago MMSA is rated High Satisfactory.

Based on a full-scope review, the institution's performance in the Chicago MMSA AA was good.

Retail Banking Services

Table 5: Distribution of Branch Delivery Systems													2024
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Chicago MMSA	100.00	167	100.00	4.19	20.36	34.13	41.32	0.00	8.90	22.51	34.17	33.76	0.65
Total	100.00	167	100.00	4.19	20.36	34.13	41.32	0.00	8.90	22.51	34.17	33.76	0.65
Source: FFIEC File - 2024 Census													
1/1/2022 - 12/31/2024 Bank Data													
Due to rounding, totals may not equal 100.0%													

Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income geographies was well below, and in moderate-income geographies approximated, the percentage of the population living within those geographies. Examiners further considered 20 middle- or upper-income adjacent branches that were within 1,000 feet of low- or moderate-income geographies within the AA. These branches improved accessibility and had a positive impact on the retail Service Test conclusion.

The bank had several ADS including ATMs, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers and were positively considered in the service delivery systems conclusion. The bank had 226 ATMs in the AA, 215 of which were deposit-taking. Per data provided by the bank, as of the end of the evaluation period, bank customers located in low- and moderate-income geographies used online banking at a rate (39.7 percent) less than customers in middle- and upper-income geographies (46.6 percent), while mobile banking usage rates amongst customers in low- and moderate-income geographies (63.5 percent) were higher than that of customers in middle- and upper-income geographies (57.1 percent). During the evaluation period, online banking usage increased 10 percent for customers located in low- and moderate-income geographies and 5 percent for customers in middle- and upper-income geographies. Mobile banking usage increased 8.7 percent for customers in low- and moderate-income geographies and 12.4 percent for customers in middle- and upper-income geographies.

Table 6: Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Chicago MMSA	1	2	0	0	-2	1	0
Total	1	2	0	0	-2	1	0
1/1/2022 - 12/31/2024 Bank Data.							

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, the bank closed two branches, neither of which were in low- or moderate-income geographies. The branch closures were a result of low productivity and nearby branch overlap. The bank opened one branch in an upper-income geography.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced, the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. Average hours of operation for branches in low- and moderate-income geographies were comparable to those branches in middle- and upper-income geographies. The majority of branches in the AA (including all low- and moderate-income branches), had lobby hours of 9:00 a.m. to 5:30 p.m. Monday through Thursday, and 9:00 a.m. to 6:00 p.m. on Friday. There were 156 branches open from 9:00 a.m. to 1:00 p.m. or 2:00 p.m. on Saturdays, including all 41 low- and moderate-income branches. There were 145 locations with drive-thru facilities, which included all branches in low-income geographies and 31 of 34 branches in moderate-income geographies. The three branches in moderate-income-geographies without drive-thru facilities were due to physical limitations at the locations.

Community Development Services

The institution provided an adequate level of CD services. During the evaluation period, bank employees provided 1,862 hours of qualified CD service activities to 65 organizations within this AA. Leadership is evident through board or committee participation, with 16 employees providing 736 service hours to 19 organizations. Additionally, the bank hosted 38 eBus and Banking to Go events during the evaluation period in the Chicago MMSA benefiting 1,359 individuals. The bank's assistance was responsive to identified needs in the AA, primarily financial literacy and technical assistance to nonprofit organizations. Service activity examples during the evaluation period include:

- Nine employees volunteered 50 hours to prepare tax returns for low-income individuals during the 2023 tax season. They partnered with a nonprofit organization that provides free tax services, tax legal assistance, and financial education for low-income individuals in underserved communities.

- Bank employees volunteered with a community services organization that provides lessons in financial literacy, work and career readiness, and entrepreneurship to predominately low- and moderate-income students from kindergarten to 12th grade. Employees provided 197 hours of financial literacy classes for the organization.

- Two senior-level bank employees provided 83 hours serving on the board of directors or committee of a local CDFI. The organization provides financing for the acquisition, rehabilitation, and preservation of affordable rental housing in Chicago area neighborhoods.

Cincinnati, OH-KY-IN MMSA (Cincinnati MMSA)

CRA rating for the Cincinnati MMSA[3]**:** Outstanding
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AA.
- The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank was a leader in making CD loans, which further supported the Lending Test rating.
- The bank had an excellent level of qualified CD investments and grants which were responsive in addressing community needs.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA with consideration for middle- and upper-income adjacent branches and ADS.
- The bank provided a relatively high level of CD services. CD services were responsive in addressing community needs.

Description of Institution's Operations in the Cincinnati MMSA

The Cincinnati MMSA AA is comprised of a portion of the Cincinnati MMSA that includes one county in Indiana, five counties in Kentucky, and five counties in Ohio. Refer to the table in appendix A for a list of counties reviewed.

As of year-end 2024, the bank operated 97 branches and 220 deposit-taking ATMs in this rating area. The bank had $40.2 billion in adjusted deposits in this rating area, which represented 24.6 percent of the bank's total adjusted deposits. This rating area was the bank's largest in terms of deposits held. During the evaluation period, the bank made $2.3 billion or 8.7 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

[3] MMSA ratings reflect performance within the multistate metropolitan statistical area. Statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked second out of 53 FDIC-insured depository institutions with a 25.9 percent deposit market share in this rating area. The top competitor, U.S. Bank, N.A., had 52.3 percent of the market share with 65 branches.

Cincinnati MMSA AA

The following table provides a summary of the demographics, including housing and business information, for the Cincinnati MMSA AA.

Assessment Area - Cincinnati MMSA						
						2022 - 2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	537	9.50	22.35	36.50	28.68	2.98
Population by Geography	2,203,982	6.72	21.04	37.85	32.98	1.40
Housing Units by Geography	922,597	7.57	22.72	38.01	30.22	1.49
Owner-Occupied Housing by Geography	567,452	3.44	17.45	41.22	37.38	0.51
Occupied Rental Units by Geography	282,028	13.89	31.58	32.85	18.91	2.78
Vacant Units by Geography	73,117	15.26	29.41	32.99	18.20	4.13
Businesses by Geography	91,429	6.03	19.94	34.62	38.28	1.14
Farms by Geography	3,265	3.12	18.44	42.66	34.98	0.80
Family Distribution by Income Level	547,810	20.76	17.17	21.01	41.06	0.00
Household Distribution by Income Level	849,480	24.65	15.43	17.47	42.45	0.00
Unemployment rate (%)	4.63	11.15	6.05	3.85	3.29	12.34
Households Below Poverty Level (%)	11.56	34.53	17.45	8.64	4.77	39.48
Median Family Income (17140 - Cincinnati, OH-KY-IN MSA)		$83,600			Median Housing Value	$161,900
Median Family Income (17140 - Cincinnati, OH-KY-IN MSA) for 2024		$103,500			Median Gross Rent	$866
					Families Below Poverty Level	7.91
FFIEC File - 2020 Census						
FFIEC File - 2024 Census 2024 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

In the performance context, examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MMSA median housing value would be $869. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Based on the 2024 median family income, the calculated maximum affordable monthly mortgage payment was $1,293 for a low-income borrower and $2,070 for a moderate-income borrower. Based on these calculations, housing was affordable for both low-

and moderate-income borrowers. Community contacts (see below) noted affordable housing continues to be a community need despite these calculations.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For this AA, 7.9 percent of households were living below the poverty level.

Economic Data

Data from the October 2024 Moody's Analytics report indicates the Cincinnati metro is in the mid-expansion part of the business cycle. Payroll growth trails the state and nation. Professional and business services have seen some recovery, but other sectors like retail, manufacturing, and healthcare remain stagnant. Major employers include Cincinnati Children's Hospital Medical Center, TriHealth Inc., University of Cincinnati, St. Elizabeth Healthcare, Proctor & Gamble Co., UC Health, and Mercy Health. Single-family housing price appreciation is slightly behind the state's above-average rate. Area strengths include a highly educated and skilled workforce, a strong transportation network coupled with the presence of multinational firms, low cost of living, affordable housing, and comparatively low business costs. Weaknesses include a high exposure to changes in trade policy as well as homebuilding being below its peak pace.

According to the BLS, the non-seasonally adjusted unemployment rate for the Cincinnati MMSA was 3.9 percent as of January 2022 and rose slightly to 4.1 percent as of December 2024. The national unemployment rate was 3.9 percent as of December 2024.

Community Contacts

Examiners reviewed information from four community contact interviews conducted during the evaluation period. The organizations contacted focus on affordable housing and economic development. One contact was with a county community development division. Community leaders emphasized a pressing need for affordable housing, particularly for low-income individuals, seniors, and renters. Rising housing and rental costs, combined with limited inventory, have strained efforts to support homeownership and housing stability for low- and moderate-income families. Banks have opportunities to expand access to home purchase and preservation financing, down payment assistance, and credit-building products. Additional engagement through financial education and support for builders constructing affordable units is also needed. While some progress is being made through initiatives like office-to-residential conversions and LIHTC loans, these often miss the lowest-income families most in need. These sources identified the following needs and opportunities within the community:

- Affordable housing, especially for low-income individuals and seniors
- Capital for affordable housing developers and rehab efforts
- Credit-building products to support financially marginalized individuals
- Investment in affordable rental housing and homeownership
- Continued and expanded use of LIHTC and similar financing tools
- Financial education workshops on budgeting and homeownership

- Flexible home purchase loan programs
- Lending products tailored to support office-to-residential conversions
- Down payment assistance and home repair financing

Scope of Evaluation in the Cincinnati MMSA

Examiners conducted a full-scope review of the Cincinnati MMSA AA. Examiners placed more emphasis on home mortgage loans than small loans to businesses in arriving at the overall conclusion as they represented the majority of lending in the AA. The bank originated or purchased too few small loans to farms in this rating area to conduct a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CINCINNATI MMSA

LENDING TEST

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

Based on a full-scope review, the bank's performance in the Cincinnati MMSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Table 3: Lending Activity **2022 - 2024**

Number of Loans

Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Cincinnati MMSA	13,315	3,187	13	97	-	16,612	100.00	100.00
Broader Statewide or Regional Area	0	0	0	0	-	0	NA	NA
Total	**13,315**	**3,187**	**13**	**97**	**-**	**16,612**	**100.00**	**100.00**

Dollar Volume of Loans ($000s)

Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Cincinnati MMSA	1,899,807	432,764	648	342,263	-	2,675,482	100.00	100.00
Broader Statewide or Regional Area	0	0	0	0	-	0	NA	NA
Total	**1,899,807**	**432,764**	**648**	**342,263**	**-**	**2,675,482**	**100.00**	**100.00**

Source: 1/1/2022 - 12/31/2024 Bank Data.

Due to rounding, totals may not equal 100.0%

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked second out of 53 FDIC-insured depository institutions (top 4 percent) with a 25.9 percent deposit market share.

For home mortgage loans, the bank's market share of 6.2 percent ranked first out of 630 lenders. Huntington National Bank ranked second with a 5 percent market share and US Bank, N.A. ranked third with a 3.9 percent market share.

For small loans to businesses, the bank's market share of 2.2 percent ranked 10th out of 139 lenders (top 8 percent). The top three lenders were American Express National Bank with 27.1 percent market share, JPMorgan Chase Bank, N.A. with 16.9 percent market share, and US Bank, N.A. with 12.5 percent market share. The top small business lenders were institutions with large business credit card portfolios with average loan sizes of $22.000 or less. FTB's average small business loan size was $152,000.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. The geographic distribution of home mortgage loans was good and the distribution of small loans to businesses was excellent.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans was good. The percentage of home mortgage loans originated or purchased in low-income geographies was below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies approximated the percentage of owner-occupied housing units located in those geographies and was near to the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was excellent. The percentage of small loans to businesses originated or purchased in low-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AA. Examiners did not identify any unexplained conspicuous gaps in the full-scope area reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes. The distribution of home mortgage loans was excellent and the distribution of loans to businesses of different sizes was good.

Home Mortgage Loans

Refer to Table 8 in the MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was excellent. The percentage of home mortgage loans originated or purchased to low-income borrowers was near to the percentage of those families in the AA but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table 10 in the MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was good. The percentage of loans to small businesses originated or purchased was below the percentage of small businesses in the AA but exceeded the aggregate percentage of all reporting lenders.

Community Development Lending

The institution was a leader in making CD loans, which further supported the Lending Test rating.

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

The volume of CD lending was excellent. During the evaluation period, FTB originated 97 CD loans totaling $342.3 million or 6.6 percent of allocated tier 1 capital. By dollar volume, 59.1 percent funded economic development, 24.1 percent funded affordable housing, 15.6 percent funded community services, and 1.2 percent funded revitalization and stabilization efforts. CD

loans were responsive to identified community needs including affordable housing and economic development. The following are examples of CD loans originated or purchased in the MMSA:

- A $5.6 million construction loan for a 62-unit permanent supportive housing unit for formerly homeless individuals with a history of mental illness. The bank demonstrated a multifaceted approach that also included an investment and grant to purchase welcome kits for the residents.

- An $8.4 million construction loan to finance a new development that will provide 42 units of affordable housing. The apartments were income-restricted and elected to utilize the average income test with some tenants making less than 80 percent of the area median income. The bank demonstrated a multifaceted approach, investing an additional $9.7 million in the development.

- A $10 million construction loan to support the historic revitalization of the Walnut Hills neighborhood that will provide affordable senior housing for individuals earning less than 80 percent of the area median income.

Product Innovation and Flexibility

The institution made limited use of innovative and/or flexible lending practices to serve AA credit needs. The bank originated or purchased 1,609 loans under its flexible lending programs totaling $249.7 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for details regarding the programs offered.

INVESTMENT TEST

The institution's performance under the Investment Test in the Cincinnati MMSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Cincinnati MMSA AA was excellent.

Number and Amount of Qualified Investments

Table 4: Qualified Investments

Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Cincinnati MMSA	103	162,115	105	179,674	208	100.00	341,788	100.00	2	15,440
Broader Statewide or Regional Area	0	0	0	0	0	0	0	0	0	0
Total	103	162,115	105	179,674	208	100.00	341,788	100.00	2	15,440

The institution had an excellent level of qualified investments, including grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current and prior period investments (excluding unfunded commitments) represented 6.6 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community development needs. The institution made significant use of innovative and/or complex investments to support CD initiatives. By dollar volume during the current period, 86.6 percent of total investments and grants supported affordable housing, 8.8 percent promoted economic development, 2.3 percent funded revitalization and stabilization efforts, and 2.3 percent supported community services to low- and moderate-income individuals. The following are examples of qualified investments in the MMSA:

- The bank, in a leadership position, made four investments totaling $3.3 million to a fund that addresses gaps in equity and growth capital access. The fund ensures 50 percent of investments target businesses in low- and moderate-income communities. The investment responded to a bank-identified community need for access to capital for small businesses.

- The bank made two complex investments totaling $3.9 million to fund existing affordable housing projects with 150 total units. The investments responded to the community identified need for affordable housing.

- The bank made a complex $1.6 million New Market Tax Credit investment to renovate an existing building to provide an additional 21 housing units for women and children experiencing domestic violence. This new shelter is expected to serve 600 adults and children each year, nearly all of whom would be at or below the poverty line. The investment responded to a bank-identified community need for critical social services for vulnerable populations.

SERVICE TEST

The institution's performance under the Service Test in the Cincinnati MMSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Cincinnati MMSA AA was excellent.

Retail Banking Services

Table 5: Distribution of Branch Delivery Systems													2024
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Cincinnati MMSA	100.00	97	100.00	4.12	17.53	43.30	34.02	1.03	6.72	21.04	37.85	32.98	1.40
Total	100.00	97	100.00	4.12	17.53	43.30	34.02	1.03	6.72	21.04	37.85	32.98	1.40

Source: FFIEC File - 2024 Census *1/1/2022 - 12/31/2024 Bank Data* *Due to rounding, totals may not equal 100.0%*

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income geographies was below, and in moderate-income geographies was near to, the percentage of the population living within those geographies. Examiners further considered 12 middle- or upper-income adjacent branches that were within 1,000 feet of low- or moderate-income geographies within the AA. These branches improved accessibility and had a positive impact on the retail Service Test conclusion.

The bank had several ADS including ATMs, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers and were positively considered in the service delivery systems conclusion. The bank had 267 ATMs in the AA, 220 of which were deposit-taking. Per data provided by the bank, as of the end of the evaluation period, bank customers located in low- and moderate-income geographies used online banking at a rate (46.8 percent) less than customers in middle- and upper-income geographies (58.2 percent), while mobile banking usage rates amongst customers in low- and moderate-income geographies (60.3 percent) was comparable with that of customers in middle- and upper-income geographies (61.3 percent). During the evaluation period, online banking usage increased 10.6 percent for customers located in low- and moderate-income geographies and 6.4 percent for customers in middle- and upper-income geographies. Mobile banking usage increased 10.8 percent for customers in low- and moderate-income geographies and 10.3 percent for customers in middle- and upper-income geographies.

Table 6: Distribution of Branch Openings/Closings

Branch Openings/Closings							
Assessment Area	**# of Branch Openings**	**# of Branch Closings**	**Net change in Location of Branches (+ or -)**				
			Low	**Mod**	**Mid**	**Upp**	**NA**
Cincinnati MMSA	2	20	-3	-2	-11	-2	0
Total	2	20	-3	-2	-11	-2	0

1/1/2022 - 12/31/2024 Bank Data.

To the extent changes have been made, the institution's opening and closing of branches has adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, the bank closed 20 branches, three of which were in low-income geographies and two of which were in moderate-income geographies. The branch closures were a result of low productivity and nearby branch overlap. The majority (15) of the closures were Bank Mart locations inside grocery stores, including one low-income location and two moderate-income locations. The bank opened two branches in upper-income geographies.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. Average hours of operation for branches in low- and moderate-income geographies were less than those branches in middle- and upper-income geographies. However, this was

attributed to the different branch types operating in the AA including one branch located in the Cincinnati/Northern Kentucky International Airport (income category "unknown") that operated seven days a week from 7:30 a.m. to 5:30 p.m. Branch hours were consistent in the AA based on the branch type. There were 74 Standard Banking Center branches that primarily had lobby hours of 9:00 a.m. to 5:00 p.m. Monday through Thursday and 9:00 a.m. to 6:00 p.m. on Friday. There were 60 Banking Center branches open on Saturday, of which the majority had lobby hours from 9:00 a.m. to 12:00 p.m. Of the branches opened on Saturday, two were in low-income geographies and 12 were in moderate-income geographies. There were 22 Banking Mart (in-store) branches that had lobby hours of 10:00 a.m. to 7:00 p.m. Monday through Friday and 10:00 a.m. to 5:00 p.m. on Saturday. Of these branches one was in a low-income geography, and one was in a moderate-income geography. There were 81 locations with drive-thru facilities, which included all branches in low-income geographies and 16 of 17 branches in moderate-income geographies. The one branch in a moderate-income-geography without a drive-thru was due to physical limitations at the location.

Community Development Services

The institution provided a relatively high level of CD services. During the evaluation period, bank employees provided over 1,795 hours of qualified CD service activities to 56 organizations within this AA. Leadership is evident through board or committee participation, with 46 employees providing 1,106 service hours to 47 organizations. Additionally, the bank hosted 28 eBus and Banking to Go events during the evaluation period in the Cincinnati MMSA benefiting 4,713 individuals. The bank's assistance was responsive to an identified need in the AA, primarily financial literacy and affordable housing. Service activity examples during the evaluation period include:

- Thirty-two employees volunteered 181 hours to prepare tax returns for low-income individual during the 2023 tax season. They partnered with a local chapter of a nationwide nonprofit organization that provides essential services to predominately low- and moderate-income individuals and families in the greater Cincinnati area.

- A bank employee provided 117 hours serving on the board of directors of a local community development corporation. The nonprofit organization addresses critical affordable housing needs through a real estate portfolio that covers rehabilitated properties and new construction. They work with the area's leading businesses and organizations to create jobs and economic opportunities for area residents.

- A bank employee provided 120 hours serving on the board of directors of a local community service organization that partners with other local social service agencies to provide free diapers to families in need while raising awareness of the basic health need for diapers.

Evansville, IN-KY MMSA (Evansville MMSA)

CRA rating for the Evansville MMSA[4]: Outstanding
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AA.
- The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank was a leader in making CD loans, which further supported the Lending Test rating.
- The bank had an excellent level of qualified CD investments and grants which were responsive in addressing community needs.
- Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the institution's AAs with consideration for middle- and upper-income adjacent branches and ADS.
- The bank was a leader in providing CD services. CD services were responsive in addressing community needs.

Description of Institution's Operations in the Evansville MMSA

The bank delineated the entirety of the Evansville MMSA as an AA. Refer to the table in appendix A for a list of counties reviewed.

As of year-end 2023, the bank operated 12 branches and 14 deposit-taking ATMs in this rating area. As of June 30, 2023, the bank had $2.2 billion in deposits in this rating area. During 2022-2023, the bank made $150.6 million or 0.6 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

Based on the June 30, 2023, FDIC Summary of Deposit Market Share Report, FTB ranked third out of 18 FDIC-insured depository institutions with a 17.3 percent deposit market share in this rating area. The top two competitors had 61.6 percent of the market share and included Old

[4] MMSA ratings reflect performance within the multistate metropolitan statistical area. Statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

National Bank with 16 branches and 31.8 percent deposit market share, and United Fidelity Bank, fsb with seven branches and 29.8 percent deposit market share.

Evansville MMSA AA

The following table provides a summary of the demographics, including housing and business information, for the Evansville MMSA AA.

Assessment Area - 2022-2023 Evansville MMSA						
						2022 - 2023
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	96	11.46	22.92	36.46	22.92	6.25
Population by Geography	314,049	7.84	21.81	38.84	31.35	0.16
Housing Units by Geography	142,916	9.25	23.64	39.35	27.41	0.35
Owner-Occupied Housing by Geography	89,642	5.16	18.10	43.08	33.47	0.19
Occupied Rental Units by Geography	40,182	14.74	34.34	33.38	17.10	0.45
Vacant Units by Geography	13,092	20.39	28.80	32.06	17.55	1.21
Businesses by Geography	11,725	8.01	22.17	32.07	31.62	6.12
Farms by Geography	685	2.77	12.12	49.05	35.47	0.58
Family Distribution by Income Level	83,570	21.25	17.70	21.02	40.03	0.00
Household Distribution by Income Level	129,824	23.56	16.62	17.62	42.20	0.00
Unemployment rate (%)	4.44	10.29	5.15	4.39	2.63	12.57
Households Below Poverty Level (%)	13.64	31.23	17.97	12.83	6.26	8.07
Median Family Income (21780 - Evansville, IN MSA)		$72,963			Median Housing Value	$124,300
Median Family Income (21780 - Evansville, IN MSA) for 2023		$87,300			Median Gross Rent	$783
					Families Below Poverty Level	9.64
FFIEC File - 2020 Census						
2023 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

In the performance context, examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MMSA median housing value would be $667. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Based on the 2024 median family income, the calculated maximum affordable monthly mortgage payment was $1,091 for a low-income borrower and $1,746 for a moderate-income borrower. Based on these calculations, housing was affordable for both low- and moderate-income borrowers. Community contacts (see below) noted affordable housing continues to be a community need despite these calculations.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For this AA, 9.6 percent of families were living below the poverty level.

Economic Data

Data from the October 2024 Moody's Analytics report indicates the Evansville metro is in the mid-expansion part of the business cycle. Monthly job growth picked up in 2024, and total employment is similar to the state and nation in the previous year, with education and healthcare leading the way. The University of Southern Indiana and the University of Evansville provide stable jobs. Major employers include Deaconess Hospital, Toyota Motor Manufacturing Indiana Inc., Ascension St. Vincent Health System, Berry Global, and University of Southern Indiana. Home prices trail state growth year-over-year. Population growth is well below the national average. Area strengths include healthcare that attracts patients from nearby rural areas, a high-value-added manufacturing base, and low business costs. Weaknesses include a smaller proportion of working-age adults, a lack of high-wage job opportunities, and poor quality of life metrics.

According to the BLS, the non-seasonally adjusted unemployment rate for the Evansville MMSA was 3.3 percent as of January 2022 and decreased to 2.9 percent as of December 2023. The national unemployment rate was 3.8 percent as of December 2023.

Community Contacts

Examiners reviewed information from two community contact interviews conducted during the evaluation period. One contact was a real estate brokerage, and the other was an economic development corporation. Ongoing challenges related to housing, business support, and financial accessibility were identified. These sources identified the following needs and opportunities within the community:

- Affordable housing, including market rate housing
- Funding for affordable housing developments
- Grants for home improvements and home repairs
- Financial education and support for women and minority owned businesses
- Small business education and training

Scope of Evaluation in the Evansville MMSA

Examiners conducted a full-scope review of the Evansville MMSA AA for 2022-2023. Examiners placed more emphasis on home mortgage loans than small loans to businesses in arriving at the overall conclusion as they represent the majority of lending in the AA. The bank originated or purchased too few small loans to farms in this rating area to conduct a meaningful analysis.

During the evaluation period, MSA boundary changes introduced in July 2023, effective January 1, 2024, by the United States OMB, resulted in Henderson County, Kentucky being reclassified as a non-MSA county in 2024. For 2024, the three counties in the Evansville MSA AA are included in the state of Indiana and Henderson County, Kentucky is included in the KY non-MSA AA. An analysis of the Evansville MMSA AA was performed for 2022-2023. As of 2024, the analysis was completed under the Evansville MSA AA in the state of Indiana. The Investment Test for the Evansville MMSA AA does not consider prior period investments, as they are considered as part of the Evansville MSA AA, which covers the 2024 period. Additionally, for the Evansville MMSA AA, examiners considered deposits as of June 30, 2023, and tier 1 capital as of December 31, 2023.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE EVANSVILLE MMSA

LENDING TEST

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

Based on a full-scope review, the bank's performance in the Evansville MMSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Table 3: Lending Activity **2022 - 2023**

Number of Loans

Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Evansville MMSA	1,191	161	4	8	-	1,364	100.00	100.00
Broader Statewide or Regional Area	0	0	0	0	-	0	NA	NA
Total	**1,191**	**161**	**4**	**8**	**-**	**1,364**	**100.00**	**100.00**

Dollar Volume of Loans ($000s)

Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Evansville MMSA	128,181	22,187	259	24,494	-	175,121	100.00	100.00
Broader Statewide or Regional Area	0	0	0	0	-	0	NA	NA
Total	**128,181**	**22,187**	**259**	**24,494**	**-**	**175,121**	**100.00**	**100.00**

Source: 1/1/2022 - 12/31/2023 Bank Data.

Due to rounding, totals may not equal 100.0%

Based on the June 30, 2023, FDIC Summary of Deposit Market Share Report, FTB ranked third out of 18 FDIC-insured depository institutions (top 17 percent) with a 17.3 percent deposit market share.

For home mortgage loans, the bank's market share of 4.6 percent ranked sixth out of 267 lenders (top 3 percent). The top three lenders were Liberty Federal Credit Union with 15.4 percent market share, Mortgage Masters of Indiana with 8.4 percent market share, and Amerihome Mortgage Company with 6.9 percent market share.

For small loans to businesses, the bank's market share of 1.4 percent ranked 13th out of 74 lenders (top 18 percent). The top three lenders were American Express National Bank with 19.3 percent market share, JPMorgan Chase Bank, N. A. with 13.3 percent market share, and Synchrony Bank with 12.2 percent market share. The top small business lenders were institutions with large business credit card portfolios with average loan sizes of $13,000 or less. FTB's average small business loan size was $178,000.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. The geographic distribution of both home mortgage loans and small loans to businesses was good.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans was good. The percentage of home mortgage loans originated or purchased in low-income geographies was below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies exceeded both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was good. The percentage of small loans to businesses originated or purchased in low-income geographies was well below both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. Only 8 percent of businesses are in low-income census tracts, while 22.2 percent of businesses are in moderate-income census tracts; therefore, more emphasis was placed on performance in moderate-income census tracts given the increased opportunities.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AA. Examiners did not identify any unexplained conspicuous gaps in the full-scope area reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes. The distribution of home mortgage loans was excellent and the distribution of loans to businesses of different sizes was good.

Home Mortgage Loans

Refer to Table 8 in the MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was excellent. The percentage of home mortgage loans originated or purchased to low-income borrowers exceeded both the percentage of those families in the AA and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table 10 in the MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was good. The percentage of loans to small businesses originated or purchased was below the percentage of small businesses in the AA but exceeded the aggregate percentage of all reporting lenders.

Community Development Lending

The institution was a leader in making CD loans, which further supported the Lending Test rating.

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

The level of CD lending was excellent. During the evaluation period, FTB originated eight CD loans totaling $24.5 million or 9.5 percent of allocated tier 1 capital as of December 31, 2023. By dollar volume, 69.4 percent funded community services, and 30.6 percent funded affordable

housing. CD loans were responsive to the identified need for affordable housing. The following are examples of CD loans the bank originated or purchased in the MMSA:

- A $1 million line of credit to a nonprofit organization whose mission is to create affordable housing, offer supportive services, and promote community development.

- A $4.8 million equity bridge loan to finance the renovation of 36 LIHTC housing units, all units are restricted to tenants with incomes below 80 percent of the area median family income. The bank demonstrated a multifaceted approach by also making a $7.1 million investment, as highlighted under the Investment Test below.

- A $2 million loan to a nonprofit organization to support services for the low- and moderate-income community. The organization provides high-quality vocational and developmental opportunities to individuals who are disabled and/or disadvantaged.

Product Innovation and Flexibility

The institution used innovative and/or flexible lending practices in order to serve AA credit needs. The bank originated or purchased 136 loans under its flexible lending programs totaling $15.4 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for details regarding the programs offered.

INVESTMENT TEST

The institution's performance under the Investment Test in the Evansville MMSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Evansville MMSA AA was excellent.

Number and Amount of Qualified Investments

Table 4: Qualified Investments

Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Evansville MMSA	0	0	23	13,300	23	100.00	13,300	100.00	0	0
Broader Statewide or Regional Area	0	0	0	0	0	0	0	0	0	0
Total	0	0	23	13,300	23	100.00	13,300	100.00	0	0

The institution had an excellent level of qualified investments, including grants, but not in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current period investments represented 5.2 percent of allocated tier 1 capital as

of December 31, 2023. This conclusion is based on a two-year evaluation period, as described in the Scope of Evaluation section of this rating area.

The institution exhibited excellent responsiveness to credit and community development needs. Investments were particularly responsive to affordable housing needs. The institution did not use innovative and/or complex investments to support CD initiatives. By dollar volume during the current period, 98.4 percent of total investments and grants supported affordable housing, 1.1 percent supported community services to low- and moderate-income individuals, and 0.5 percent promoted economic development. The following are examples of qualified investments in the MMSA:

- The bank made a $7.1 million investment in a multi-investor LIHTC fund for the renovation of 35 units and the conversion of a community room into an additional unit, creating a total of 36 affordable housing units that serve households earning 30 percent, 50 percent, and 60 percent of the area median income. The bank demonstrated a multifaceted approach by also providing $4.8 million in bridge financing.

- The bank made a $6 million investment in a multi-investor LIHTC fund for a 36-unit property, where the majority of units are restricted to households at or below 60 percent of the area median income.

- The bank made a $15,000 grant to provide subsidized marketing services to small businesses in a distressed neighborhood that has a median household income of approximately $26,000.

SERVICE TEST

The institution's performance under the Service Test in the Evansville MMSA is rated High Satisfactory.

Based on a full-scope review, the institution's performance in the Evansville MMSA AA was good.

Retail Banking Services

Table 5: Distribution of Branch Delivery Systems														2023
Assessment Area	Deposits	Branches							Population					
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography					
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA	
Evansville MMSA	100.00	12	100.00	0.00	8.33	41.67	33.33	16.67	7.84	21.81	38.84	31.35	0.16	
Total	100.00	12	100.00	0.00	8.33	41.67	33.33	16.67	7.84	21.81	38.84	31.35	0.16	
Source: FFIEC File - 2020 Census *1/1/2022- 12/31/2023 Bank Data* *Due to rounding, totals may not equal 100.0%*														

Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the institution's AA. The bank did not have any branches in low-income geographies. The bank's distribution of branches in low-income geographies was significantly

below, and in moderate-income geographies was well below, the percentage of the population living within those geographies. Examiners considered four middle- or upper-income adjacent branches that were within 1,000 feet of low- or moderate-income geographies within the AA. These branches improved accessibility and had a positive impact on the retail Service Test conclusion.

The bank had several ADS including ATMs, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers and were positively considered in the service delivery systems conclusion. The bank had 16 ATMs in the AA, 14 of which were deposit-taking. Per data provided by the bank, as of the fourth quarter of 2021, bank customers located in low- and moderate-income geographies used online banking at a rate (38.3 percent) less than customers in middle- and upper-income geographies (45.9 percent), while mobile banking usage rates amongst customers in low- and moderate-income geographies (53.7 percent) was consistent with that of customers in middle- and upper-income geographies (52.7 percent). The OCC did not consider usage rate trends for this AA given that it did not exist in 2024.

Table 6: Distribution of Branch Openings/Closings

Branch Openings/Closings							
Assessment Area	**# of Branch Openings**	**# of Branch Closings**	**Net change in Location of Branches (+ or -)**				
			Low	**Mod**	**Mid**	**Upp**	**NA**
Evansville MMSA	0	1	0	-1	0	0	0
Total	0	1	0	-1	0	0	0

1/1/2022- 12/31/2023 Bank Data.

To the extent changes have been made, the institution's opening and closing of branches has adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During 2022-2023, the bank closed one moderate-income branch. The branch closure was a result of low productivity and nearby branch overlap. The bank did not open any branches in this AA during 2022-2023.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced, the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. Average hours of operation for branches in moderate-income geographies were comparable to those branches in middle- and upper-income geographies. There were four branches, including the one moderate-income branch, with lobby hours of 9:00 a.m. to 4:00 p.m. and eight branches open until 5:00 p.m. Monday through Thursday. Eleven branches were open from 9:00 a.m. to 6:00 p.m. on Friday, with one middle-income branch open until 5:00 p.m. Eleven branches were open from 9:00 a.m. to 12:00 p.m. on Saturdays, including the one branch located in a moderate-income geography. The one branch closed on Saturday is in the downtown business district. All branches in the AA had drive-thru facilities.

Community Development Services

The institution was a leader in providing CD services. During the evaluation period, bank employees provided over 374 hours of qualified CD service activities to approximately 12 organizations within this AA. Leadership is evident through board or committee participation, with six employees providing 340 service hours to nine organizations. Additionally, the bank hosted three eBus and Banking to Go events during the evaluation period benefiting 147 individuals. The bank's assistance was responsive to identified needs in the AA, primarily financial literacy and technical assistance to small businesses and nonprofit organizations. Service activity examples during the evaluation period include:

- A bank employee provided 78 hours of board services for an organization that supports affordable housing initiatives. The organization works with low- and moderate-income households to break down barriers to homeownership. Their programs focus on financial education, credit coaching, and housing counseling to equip people for homeownership. Additionally, they help homeowners maintain homeownership during a financial crisis through foreclosure prevention counseling.

- A bank employee provided 70 hours of board services for a nonprofit organization dedicated to serving the homeless and near homeless. They provide direct services such as rental assistance and intensive case management to individuals and families experiencing street/shelter homelessness. They also facilitate collaboration among other social service agencies, churches, schools, businesses, etc. to make ending homelessness a reality.

- A bank employee provided 70 hours of board services for a nonprofit organization that offers a comprehensive range of programs and services tailored to meet the needs of the organization's local community. Programs include physical, occupational, and speech therapies, early childhood care and education, mental health outreach, and residential and day services. The organization's clients are predominately low- and moderate-income individuals and families with approximately 95 percent of individuals receiving ongoing therapies requiring financial assistance.

Huntington-Ashland, WV-KY-OH MMSA (Huntington MMSA)

CRA rating for the Huntington MMSA[5]: Satisfactory
The Lending Test is rated: High Satisfactory
The Investment Test is rated: Outstanding
The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments and grants which were responsive in addressing community needs.
- Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AA with consideration for middle- and upper-income adjacent branches and ADS.
- The bank provided a limited level of CD services.

Description of Institution's Operations in the Huntington MMSA

The Huntington MMSA AA is comprised of a portion of the Huntington MMSA that includes one county in Kentucky and three counties in West Virginia. Refer to the table in appendix A for a list of counties reviewed.

As of year-end 2024, the bank operated four branches and six deposit-taking ATMs in this rating area. The bank had $327 million in deposits in this rating area, which represented 0.2 percent of the bank's total adjusted deposits. This rating area was the bank's 16th largest in terms of deposits held. During the evaluation period, the bank made $50 million or 0.2 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked eighth out of 20 FDIC-insured depository institutions with a 5.7 percent deposit market share in this rating area. The top three competitors had 34.9 percent of the market share and included City National Bank of West Virginia with 13 branches and 14.1 percent deposit market share,

[5] MMSA ratings reflect performance within the multistate metropolitan statistical area. Statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

JPMorgan Chase Bank, N.A. with three branches and 11.4 percent deposit market share, and Putnam County Bank with five branches and 9.4 percent deposit market share.

Huntington MMSA AA

The following table provides a summary of the demographics, including housing and business information, for the Huntington MMSA AA.

Assessment Area - Huntington MMSA						
						2022 - 2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	72	8.33	22.22	40.28	29.17	0.00
Population by Geography	239,033	5.02	17.61	46.22	31.15	0.00
Housing Units by Geography	111,629	5.53	19.52	44.89	30.06	0.00
Owner-Occupied Housing by Geography	66,061	1.68	14.88	47.76	35.68	0.00
Occupied Rental Units by Geography	28,370	11.80	28.42	37.84	21.93	0.00
Vacant Units by Geography	17,198	10.00	22.66	45.50	21.85	0.00
Businesses by Geography	7,780	10.14	20.48	39.07	30.31	0.00
Farms by Geography	287	3.48	9.06	52.96	34.49	0.00
Family Distribution by Income Level	59,624	20.79	15.59	20.18	43.44	0.00
Household Distribution by Income Level	94,431	26.07	14.66	15.92	43.34	0.00
Unemployment rate (%)	5.47	6.63	8.44	5.67	3.71	0.00
Households Below Poverty Level (%)	18.81	47.98	31.29	15.88	11.12	0.00
Median Family Income (26580 - Huntington-Ashland, WV-KY-OH MSA)		$60,822			Median Housing Value	$128,200
Median Family Income (26580 - Huntington-Ashland, WV-KY-OH MSA) for 2024		$74,300			Median Gross Rent	$738
					Families Below Poverty Level	12.10
FFIEC File - 2020 Census						
FFIEC File - 2024 Census 2024 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

In the performance context, examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MMSA median housing value would be $688. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Based on the 2024 median family income, the calculated maximum affordable monthly mortgage payment was $929 for a low-income borrower and $1,486 for a moderate-income borrower. Based on these calculations, housing was affordable for both low- and moderate-income borrowers. Community contacts (see below) noted affordable housing continues to be a community need despite these calculations.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For this AA, 12.1 percent of families were living below the poverty level.

Economic Data

Data from the August 2024 Moody's Analytics report indicates the Huntington metro is in the late expansion part of the business cycle. Employment is approximately 1 percent higher than before the pandemic, and employment dropped in 2024 due to losses in transportation/warehousing and professional/business services jobs. The metro area relies on healthcare jobs, and healthcare employment has only risen 5 percent since the start of the pandemic, which is below the national average. State government employment is higher than its pre-pandemic level. Major employers include King's Daughters Medical Center, Cabell Huntington Hospital, St. Mary's Medical Ctr, Marshall University, Marathon Petroleum, Toyota Motor Corp., Huntington VA Medical Center, and Marshall Health. Housing price increases were above average in the prior year but have risen less than the national average since 2020. The population declined over the past ten years. Area strengths include a low cost of living, the location being favorable for transportation/warehousing, a large university that anchors the economy, and below average employment volatility. Weaknesses include exposure to the declining coal industry, a low-skilled and low-paid workforce, and a declining population coupled with migration of people out of the area.

According to the BLS, the non-seasonally adjusted unemployment rate for the Huntington MMSA was 5 percent as of January 2022 and decreased to 4.7 percent as of December 2024. The national unemployment rate was 3.9 percent as of December 2024.

Community Contacts

Examiners reviewed information from two community contact interviews conducted during the evaluation period. Both contacts represented organizations focused on affordable housing. Leaders of these organizations identified expanding affordable housing access, improving financial literacy, and addressing systemic weaknesses such as poverty and limited access to essential services as primary needs. Contacts suggested banks and financial institutions could contribute through lending, investment, volunteerism, and partnerships. These sources identified the following needs and opportunities within the community:

- Access to competitive lines of credit and commercial lending, including financing for vehicles and infrastructure
- Grant funding and construction reimbursement for affordable housing initiatives
- Collaborative programs to share the cost of housing development
- Volunteering on nonprofit boards and homeowner selection committees
- Homebuyer counseling programs to support first-time and low-income homebuyers
- Programs to purchase loans originated by nonprofits

- Financial literacy and education seminars
- Fundraising assistance
- Support for housing and shelter, food insecurity, mental health services, and transportation

Scope of Evaluation in the Huntington MMSA

Examiners conducted a full-scope review of the Huntington MMSA AA. Examiners placed more emphasis on home mortgage loans than small loans to businesses in arriving at the overall conclusion as they represented the majority of lending in the AA. The bank originated or purchased too few small loans to farms in this rating area to conduct a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE HUNTINGTON MMSA

LENDING TEST

The bank's performance under the Lending Test in the Huntington MMSA is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the Huntington MMSA AA was good.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Table 3: Lending Activity **2022 - 2024**

Number of Loans

Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Huntington MMSA	430	32	0	6	0	468	100.00	100.00
Broader Statewide or Regional Area	0	0	0	0	-	0	NA	NA
Total	**430**	**32**	**0**	**6**	**0**	**468**	**100.00**	**100.00**

Dollar Volume of Loans ($000s)

Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Huntington MMSA	47,248	2,698	0	2,842	0	52,788	100.00	100.00
Broader Statewide or Regional Area	0	0	0	0	-	0	NA	NA
Total	**47,248**	**2,698**	**0**	**2,842**	**0**	**52,788**	**100.00**	**100.00**

Source: 1/1/2022 - 12/31/2024 Bank Data.

Due to rounding, totals may not equal 100.0%

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked eighth out of 20 FDIC-insured depository institutions (top 40 percent) with a 5.7 percent deposit market share.

For home mortgage loans, the bank's market share of 2.7 percent ranked 10th out of 194 lenders (top 5 percent). The top three lenders were City National Bank of West Virginia with 12.4 percent market share, Movement Mortgage, LLC with 4.9 percent market share, and Rocket Mortgage with 4.8 percent market share.

For small loans to businesses, the bank's market share of 0.3 percent ranked 25th out of 70 lenders (top 36 percent). The top three lenders were American Express National Bank with 25.6 percent market share, JPMorgan Chase Bank, N.A. with 14.4 percent market share, and Capital One, N.A. with 8.4 percent market share. The top small business lenders were institutions with large business credit card portfolios with average loan sizes of $15,000 or less. FTB's average small business loan size was $61,000.

Distribution of Loans by Income Level of the Geography

The bank exhibited a poor geographic distribution of loans in its AA. The distribution of home mortgage loans was poor and the distribution of small loans to businesses was excellent. While the geographic distribution of small loans to businesses was excellent, the bank originated only 32 small loans to businesses during the evaluation period; therefore, more emphasis was placed on home mortgage lending.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans was poor. The percentage of home mortgage loans originated or purchased in low-income geographies was significantly below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies was below the percentage of owner-occupied housing units located in those geographies but was near to the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was excellent. The percentage of small loans to businesses originated or purchased in low-income geographies was near to the percentage of businesses located in those geographies and exceeded the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in

moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AA. Examiners did not identify any unexplained conspicuous gaps in the full-scope area reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses of different sizes. The distribution of home mortgage loans was good and the distribution of small loans to businesses was excellent.

Home Mortgage Loans

Refer to Table 8 in the MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was good. The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below the percentage of those families in the AA but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table 10 in the MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was excellent. The percentage of loans to small businesses originated or purchased was near to the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders. More emphasis was placed on the bank's lending when compared to all reporting lenders in the AA, as the bank's lending to small businesses was 1.3 times that of other lenders.

Community Development Lending

The institution was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.

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

The level of CD lending was excellent. During the evaluation period, FTB originated six CD loans totaling $2.8 million or 6.8 percent of allocated tier 1 capital. By dollar volume, 63.3 percent funded community services and 36.7 percent funded affordable housing. CD loans were responsive to identified community needs including community services and affordable housing. The following are examples of CD loans the bank originated or purchased in the MMSA:

- A $600,000 working capital loan to support a nonprofit organization in maintaining operations and support of their essential services and programs. The mission of the organization is to empower people to overcome employment barriers and help strengthen individuals, families and communities. The majority of the individuals served by the organization earn less than 80 percent of the area median income.

- A $347,222 working capital loan to support a housing authority corporation, whose mission is to invest in quality affordable housing solutions for families and communities in the Kentucky portion of this MMSA. Programs offered include rental housing financing, homeownership education counseling, housing rehabilitation, homeless programs, home energy and repair initiatives, and loan servicing.

Product Innovation and Flexibility

The institution made limited use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank originated or purchased 38 loans under its flexible lending programs totaling $4.1 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for details regarding the programs offered.

INVESTMENT TEST

The institution’s performance under the Investment Test in the Huntington MMSA is rated Outstanding.

Based on a full-scope review, the institution’s performance in the Huntington MMSA AA is excellent.

Number and Amount of Qualified Investments

Table 4: Qualified Investments										
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Huntington MMSA	12	2,540	4	2,029	16	100.00	4,569	100.00	0	0
Broader Statewide or Regional Area	0	0	0	0	0	0	0	0	0	0
Total	12	2,540	4	2,029	16	100.00	4,569	100.00	0	0

The institution had an excellent level of qualified investments, including grants, although not in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current and prior period investments represented 10.9 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community development needs. The institution did not use innovative and/or complex investments to support CD initiatives. By dollar volume during the current period, 98.6 percent of total investments and grants supported affordable housing and 1.4 percent supported community services to low- and moderate-income individuals. The following are examples of qualified investments in the MMSA:

- The bank made a $2 million investment in a multi-investor LIHTC fund to support the construction of a 32-unit affordable housing development where one 26-unit building is for seniors and one six-unit building is for families. Eight units are restricted to 50 percent of the area median income and the remaining 24 units are restricted to 60 percent of the area median income. The investment responded to the bank-identified community need for affordable housing.

- There were 12 responsive investments made by the bank prior to 2022 which had a remaining book value of $2.5 million. All 12 were LIHTC investments for affordable housing.

SERVICE TEST

The institution's performance under the Service Test in Huntington MMSA is rated Low Satisfactory.

Based on a full-scope review, the institution's performance in the Huntington MMSA AA was adequate.

Retail Banking Services

Table 5: Distribution of Branch Delivery Systems														2024
Assessment Area	Deposits	Branches							Population					
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography					
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA	
Huntington MMSA	100.00	4	100.00	0.00	25.00	25.00	50.00	0.00	5.02	17.61	46.22	31.15	0.00	
Total	100.00	4	100.00	0.00	25.00	25.00	50.00	0.00	5.02	17.61	46.22	31.15	0.00	
Source: FFIEC File - 2024 Census *1/1/2022 - 12/31/2024 Bank Data* *Due to rounding, totals may not equal 100.0%*														

Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AA. The bank did not have branches in low-income geographies. The bank's distribution of branches in low-income geographies was significantly below, and in moderate-income geographies exceeded, the percentage of the population living within those geographies. Examiners considered one upper-income adjacent branch that was within 1,000 feet of a moderate-income geography within the AA, which further supported the retail Service Test conclusion.

The bank had several ADS including ATMs, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers and were positively considered in the service delivery systems conclusion. The bank had seven ATMs in the AA, six of which were deposit-taking. Per data provided by the bank, as of the end of the evaluation period, bank customers located in low- and moderate-income geographies used both online (44.7 percent) and mobile banking (61.5 percent) at rates less than customers in middle- and upper-income geographies (48.7 percent and 63.7 percent, respectively). During the evaluation period, online banking usage increased 19.8 percent for customers located in low- and moderate-income geographies and increased 8.9 percent for customers in middle- and upper-income geographies. Mobile banking usage increased 11.8 percent for customers located in low- and moderate-income and 6.7 percent for customers in middle- and upper-income geographies.

Table 6: Distribution of Branch Openings/Closings								
Branch Openings/Closings								
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)					
			Low	Mod	Mid	Upp	NA	
Huntington MMSA	0	0	0	0	0	0	0	
Total	0	0	0	0	0	0	0	
1/1/2022 - 12/31/2024 Bank Data.								

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced, the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. Average hours of operation for the branch in a moderate-income

geography was comparable to the branches in middle- and upper-income geographies. The bank maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. All branches had the same lobby hours of 9:00 a.m. to 5:00 p.m. Monday through Thursday, 9:00 a.m. to 6:00 p.m. on Friday, and 9:00 a.m. to 12:00 p.m. on Saturday. All branch locations had drive-thru facilities.

Community Development Services

The institution provided a limited level of CD services. During the evaluation period, bank employees provided 52 hours of qualified CD service activities to two organizations within this AA. These activities included board or committee participation which demonstrated leadership. Additionally, the bank hosted one Banking to Go event during the evaluation period benefiting 17 individuals. The bank's assistance was responsive to an identified need in the AA for financial literacy. Service activity examples during the evaluation period include:

- A bank employee provided 24 hours of board services for nonprofit foundation that provided predominately low- and moderate-income residents with high quality medical services and cost-effective programs that promote wellness as well as treat illness.

- A bank employee provided 28 hours of board services for the local chapter of a nationwide organization that provides a comprehensive approach to address the community's most pressing needs. These areas include community health, youth opportunity, financial security, and community resilience. The services provided predominantly serve low- and moderate-income individuals and families.

Louisville/Jefferson County, KY-IN MMSA (Louisville MMSA)

CRA rating for the Louisville MMSA[6]: Outstanding
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AA.
- The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank was a leader in making CD loans, which further supported the Lending Test rating.
- The bank had an excellent level of qualified CD investments and grants which were responsive in addressing community needs.
- Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AA with consideration for middle- and upper-income adjacent and proximate branches and ADS.
- The bank provided an adequate level of CD services. CD services were responsive in addressing community needs.

Description of Institution's Operations in the Louisville MMSA

The Louisville MMSA AA is comprised of a portion of the Louisville MMSA that includes two counties in Indiana and three counties in Kentucky. Refer to the table in appendix A for a list of counties reviewed.

As of year-end 2024, the bank operated 28 branches and 48 deposit-taking ATMs in this rating area. The bank had $3.3 billion in deposits in this rating area, which represented 2 percent of the bank's total deposits. This rating area was the bank's ninth largest in terms of deposits held. During the evaluation period, the bank made $577.7 million or 2.1 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

[6] MMSA ratings reflect performance within the multistate metropolitan statistical area. Statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked sixth out of 36 FDIC-insured depository institutions with an 8.6 percent deposit market share in this rating area. The top three competitors had 51.6 percent of the market share and included PNC Bank, N.A. with 37 branches and 22.9 percent deposit market share, JPMorgan Chase Bank, N.A. with 26 branches and 17.7 percent deposit market share, and Stock Yards Bank & Trust Company with 38 branches and 11 percent deposit market share.

Louisville MMSA AA

The following table provides a summary of the demographics, including housing and business information, for the Louisville MMSA AA.

Assessment Area - Louisville MMSA						
						2022 - 2024
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	290	10.34	24.14	35.52	27.59	2.41
Population by Geography	1,100,218	6.78	22.61	37.58	32.02	1.01
Housing Units by Geography	471,680	7.61	23.30	38.11	29.66	1.33
Owner-Occupied Housing by Geography	279,353	3.37	18.19	39.85	38.14	0.45
Occupied Rental Units by Geography	149,406	13.24	31.06	36.21	16.69	2.80
Vacant Units by Geography	42,921	15.59	29.52	33.41	19.58	1.90
Businesses by Geography	53,196	5.95	18.17	36.12	38.23	1.53
Farms by Geography	1,896	2.64	14.77	37.76	44.41	0.42
Family Distribution by Income Level	265,530	20.40	17.96	19.84	41.81	0.00
Household Distribution by Income Level	428,759	23.38	16.62	18.34	41.66	0.00
Unemployment rate (%)	4.92	13.20	6.72	3.84	3.54	7.82
Households Below Poverty Level (%)	11.78	37.26	17.48	8.75	4.73	36.16
Median Family Income (31140 - Louisville/Jefferson County, KY-IN MSA)		$76,893			**Median Housing Value**	$162,300
Median Family Income (31140 - Louisville/Jefferson County, KY-IN MSA) for 2024		$92,600			**Median Gross Rent**	$900
					Families Below Poverty Level	8.45
FFIEC File - 2020 Census						
FFIEC File - 2024 Census 2024 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

In the performance context, examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MMSA median housing value would be $871. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Based on the 2024 median family income, the calculated maximum

affordable monthly mortgage payment was $1,158 for a low-income borrower and $1,852 for a moderate-income borrower. Based on these calculations, housing was affordable for both low- and moderate-income borrowers. Community contacts (see below) noted affordable housing continues to be a community need despite these calculations.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For this AA, 8.5 percent of families were living below the poverty level.

Economic Data

Data from the August 2024 Moody's Analytics report indicates the Louisville metro is in the mid-expansion part of the business cycle. The metro lags state and national rates for year-over-year employment growth and the unemployment rate is rising, due partially to labor force gains. Healthcare leads job growth. Transportation/warehousing is a key source of jobs, while the share of logistics jobs is over double the national share. Major employers include United Parcel Service (UPS), Norton Healthcare, UofL Health Inc., Ford Motor Co., Baptist Health Systems Inc., and Humana Inc. Housing price appreciation has cooled. Area strengths include low office rents and below-average energy and tax costs, being home to UPS's largest airport hub, and an abundance of skilled manufacturing workers. Weaknesses include sluggish population growth, a lack of dynamic, high-paying industries, and an overreliance on manufacturing and logistics.

According to the BLS, the non-seasonally adjusted unemployment rate for the Louisville MMSA was 4.5 percent as of January 2022 and decreased to 4.4 percent as of December 2024. The national unemployment rate was 3.9 percent as of December 2024.

Community Contacts

Examiners reviewed information from three community contact interviews conducted during the evaluation period. Two organizations focused on small businesses and economic development and the other was a chamber of commerce. The area is facing pressing challenges related to housing, infrastructure, and small business development, driven in part by rapid population growth and aging assets. These sources identified the following needs and opportunities within the community:

- Municipal funding for the construction of infrastructure improvements, specifically water and sewer improvements
- Investment in the construction of workforce housing, primarily apartments and condominiums, near industrial parks
- Bond financing for projects
- Development of a revolving loan program that assists small businesses that would not otherwise qualify for traditional banking products
- A permanent loan guarantee fund to be funded by investors

- New business start-up capital, business lines of credit, and business credit cards for small businesses
- Affordable housing, including new home and revitalization of existing properties

Scope of Evaluation in the Louisville MMSA

Examiners conducted a full-scope review of the Louisville MMSA AA. Examiners placed more emphasis on home mortgage loans than small loans to businesses in arriving at the overall conclusion as they represented the majority of lending in the AA. The bank originated or purchased too few small loans to farms in this rating area to conduct a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE LOUISVILLE MMSA

LENDING TEST

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

Based on a full-scope review, the bank's performance in the Louisville MMSA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Table 3: Lending Activity **2022 - 2024**

Number of Loans

Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Louisville MMSA	3,327	604	5	28	-	3,964	100.00	100.00
Broader Statewide or Regional Area	0	0	0	0	-	0	NA	NA
Total	**3,327**	**604**	**5**	**28**	**-**	**3,964**	**100.00**	**100.00**

Dollar Volume of Loans ($000s)

Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Louisville MMSA	492,090	85,496	158	86,406	-	664,150	100.00	100.00
Broader Statewide or Regional Area	0	0	0	0	-	0	NA	NA
Total	**492,090**	**85,496**	**158**	**86,406**	**-**	**664,150**	**100.00**	**100.00**

Source: 1/1/2022 - 12/31/2024 Bank Data.

Due to rounding, totals may not equal 100.0%

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked sixth out of 36 FDIC-insured depository institutions (top 17 percent) with an 8.6 percent deposit market share.

For home mortgage loans, the bank's market share of 3.1 percent ranked seventh out of 492 lenders (top 2 percent). The top three lenders were United Wholesale Mortgage with 6.3 percent market share, Republic Bank & Trust with 4.9 percent market share, and PNC Bank, N.A. with 4.8 percent market share.

For small loans to businesses, the bank's market share of 0.8 percent ranked 14th out of 107 lenders (top 14 percent). The top three lenders were American Express National Bank with 25.7 percent market share, JPMorgan Chase Bank, N.A. with 22 percent market share, and Capital One, N.A. with 6.6 percent market share. The top small business lenders were institutions with large business credit card portfolios with average loan sizes of $19,000 or less. FTB's average small business loan size was $131,000.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. The distribution of home mortgage loans was good and the distribution of small loans to businesses was excellent.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans was good. The percentage of home mortgage loans originated or purchased in low-income geographies was below the percentage of owner-occupied housing units located in those geographies and was well below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies was near to both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was excellent. The percentage of small loans to businesses originated or purchased in low-income geographies was near to the percentage of businesses located in those geographies but exceeded the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AA. Examiners did not identify any unexplained conspicuous gaps in the full-scope area reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes. The distribution of home mortgage loans was excellent and the distribution of loans to businesses of different sizes was good.

Home Mortgage Loans

Refer to Table 8 in the MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was excellent. The percentage of home mortgage loans originated or purchased to low-income borrowers was below the percentage of those families in the AA but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table 10 in the MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was good. The percentage of loans to small businesses originated or purchased was below the percentage of small businesses in the AA but exceeded the aggregate percentage of all reporting lenders.

Community Development Lending

The institution was a leader in making CD loans, which further supported the Lending Test rating.

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

The level of CD lending was excellent. During the evaluation period, FTB originated 28 CD loans totaling $86.4 million or 20.2 percent of allocated tier 1 capital. By dollar volume, 60.9 percent funded affordable housing, 20.3 percent funded community services, and 18.8 percent funded economic development. CD loans were responsive to identified community needs

including affordable housing. The following are examples of CD loans the bank originated or purchased in the MMSA:

- A $21.9 million loan to finance the construction of 280 units of affordable housing and workforce development opportunities to low- and moderate-income families in West Louisville. The loan was responsive to the identified need for affordable housing and included multiple layers of funding sources, including LIHTCs. Other partners in this complex transaction include the Kentucky Housing Corporation, Huntington CDC, the Louisville Housing Trust, and JLL Real Estate Capital.

- A $750,000 line of credit that was annually renewed to support an organization that provides affordable housing and services to low -and moderate-income individuals and revitalization and stabilization in the Russell neighborhood of Louisville.

- A $1 million line of credit to a nonprofit organization to provide operational support for its mission to improve lives and the community by engaging people to give, advocate, and volunteer. The organization supports individuals and families who are on the edge of financial disaster and are on a path out of poverty and towards financial stability.

Product Innovation and Flexibility

The institution made limited use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank originated or purchased 348 loans under its flexible lending programs totaling $47.1 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for details regarding the programs offered.

INVESTMENT TEST

The institution's performance under the Investment Test in the Louisville MMSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Louisville MMSA was excellent.

Number and Amount of Qualified Investments

Table 4: Qualified Investments										
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)

Louisville MMSA	24	31,301	20	20,296	44	100.00	51,597	100.00	0	0
Broader Statewide or Regional Area	0	0	0	0	0	0	0	0	0	0
Total	24	31,301	20	20,296	44	100.00	51,597	100.00	0	0

The institution had an excellent level of qualified investments, including grants, although not in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current and prior period investments represented 12.1 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community development needs. Investments were particularly responsive to affordable housing needs. The institution did not use innovative and/or complex investments to support CD initiatives. By dollar volume during the current period, 97.9 percent of total investments and grants supported affordable housing, 1.1 percent supported community services to low- and moderate-income individuals, and 1 percent funded revitalization and stabilization efforts. The following are examples of qualified investments in the MMSA:

- The bank made a $10 million investment in a multi-investor LIHTC fund for the renovation of a 210-unit affordable housing property.

- The bank made a $7 million investment in a multi-investor LIHTC fund for the construction of 312 affordable housing units across 20 buildings, targeting families earning 50 percent, 60 percent, and 70 percent of the area median income.

SERVICE TEST

The institution's performance under the Service Test in the Louisville MMSA is rated High Satisfactory.

Based on a full-scope review, the institution's performance in the Louisville MMSA AA was good.

Retail Banking Services

Table 5: Distribution of Branch Delivery Systems														**2024**
Assessment Area	**Deposits**	**Branches**							**Population**					
	% of Rated Area Deposits in AA	**# of Bank Branches**	**% of Rated Area Branches in AA**	**Location of Branches by Income of Geographies (%)**					**% of Population within Each Geography**					
				Low	**Mod**	**Mid**	**Upp**	**NA**	**Low**	**Mod**	**Mid**	**Upp**	**NA**	
Louisville MMSA	100.00	28	100.00	0.00	28.57	39.29	32.14	0.00	6.78	22.61	37.58	32.02	1.01	
Total	100.00	28	100.00	0.00	28.57	39.29	32.14	0.00	6.78	22.61	37.58	32.02	1.01	
Source: FFIEC File - 2024 Census														
1/1/2022 - 12/31/2024 Bank Data														
Due to rounding, totals may not equal 100.0%														

Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AA. The bank did not have any branches in low-income geographies. The bank's distribution of branches in low-income geographies was significantly below, and in moderate-income geographies exceeded, the percentage of the population living within those geographies. Examiners considered two middle-income adjacent branches that were within 1,000 feet of moderate-income geographies within the AA. Additionally, the OCC considered one branch located in a middle-income geography that was in close proximity to low-income geographies and served customers residing in those areas as demonstrated by bank customer usage data. These branches improved accessibility and supported the retail Service Test conclusion.

The bank had several ADS including ATMs, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers and were positively considered in the service delivery systems conclusion. The bank had 50 ATMs in the AA, 48 of which were deposit-taking. Per data provided by the bank, as of the end of the evaluation period, bank customers located in low- and moderate-income geographies (42.3 percent) used online banking at a rate less than customers in middle- and upper-income geographies (54.8 percent), while mobile banking usage rates amongst customers in low- and moderate-income geographies (62.7 percent) was comparable with that of customers in middle- and upper-income geographies (64.2 percent). During the evaluation period, online banking usage increased 10.7 percent for customers located in low- and moderate-income geographies and increased 8.5 percent for customers in middle- and upper-income geographies. Mobile banking usage increased 12.6 percent for customers located in low- and moderate-income geographies and 10.7 percent for customers in middle- and upper-income geographies.

Table 6: Distribution of Branch Openings/Closings

Branch Openings/Closings							
Assessment Area	**# of Branch Openings**	**# of Branch Closings**	**Net change in Location of Branches (+ or -)**				
			Low	**Mod**	**Mid**	**Upp**	**NA**
Louisville MMSA	1	6	0	-1	-1	-2	-1
Total	1	6	0	-1	-1	-2	-1

1/1/2022 - 12/31/2024 Bank Data.

To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, the bank closed six branches, none of which were in low-income geographies and two of which were in moderate-income geographies. Four of the branch closures, which included an airport branch and three in-store Bank Mart branches, were the result of low branch productivity. The other two branches were consolidated into a new nearby branch location. The bank opened one branch in a moderate-income geography during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. Branch hours were consistent based on the branch type. Average hours of operation for branches in moderate-income geographies were comparable to those branches in middle- and

upper-income geographies. There were 24 Standard Banking Center branches that had lobby hours of 9:00 a.m. to 5:00 p.m. Monday through Thursday and 9:00 a.m. to 6:00 p.m. on Friday, with 19 branches open from 9:00 a.m. to 12:00 p.m. on Saturday. Six of the eight moderate-income branches in the AA were opened on Saturday. There were four Banking Mart (in-store) branches that had lobby hours of 10:00 a.m. to 7:00 p.m. Monday through Friday and 10:00 a.m. to 5:00 p.m. on Saturday. None of the Banking Mart (in-store) branches were in low- or moderate-income geographies. Of the 24 Standard Banking Center branches, all but one branch in a middle-income geography had drive-thru facilities. None of the Banking Mart branches had drive-thru facilities.

Community Development Services

The institution provided an adequate level of CD services. During the evaluation period, bank employees provided 389 hours of qualified CD service activities to 20 organizations within this AA. Leadership is evident through board or committee participation, with six employees providing 222 service hours to 10 organizations. Additionally, the bank hosted 16 eBus and Banking to Go events during the evaluation period in the Louisville MMSA benefiting 404 individuals. The bank's assistance was responsive to an identified need in the AA, primarily technical assistance to affordable housing organizations. Service activity examples during the evaluation period include:

- A bank employee provided 20 hours of board services for a nonprofit organization dedicated to ending the cycle of poverty and transform our community by empowering families and youth to succeed in education and achieve life-long self-sufficiency. The organization provides academic and career coaching, financial education, and when necessary, affordable housing assistance targeted to low- and moderate-income individuals.

- A bank employee provided 25 hours of board services for an affordable housing organization that helps families overcome obstacles to affordable, safe, sustainable housing in the AA. Through their housing, home-repair, and real estate development programs, the organization helps to build and strengthen communities, improve lives, and ensure a bright future for those in need.

- The bank hosted five eBus events at area apartment complexes located in low- and moderate-income geographies. Through these events, residents received assistance with accessing credit reports, opening accounts, and accessing other social services. A total of 47 individuals benefited from these activities.

South Bend-Mishawaka, IN-MI MMSA (South Bend MMSA)

CRA rating for the South Bend MMSA[7]**:** Outstanding
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected good responsiveness to AA credit needs.
- The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments and grants which were responsive in addressing community needs.
- Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AA with consideration for middle- and upper-income adjacent branches and ADS.
- The bank provided a relatively high level of CD services. CD services were responsive in addressing community needs.

Description of Institution's Operations in the South Bend MMSA

FTB delineated the entirety of the South Bend MMSA as an AA. Refer to the table in appendix A for a list of counties reviewed.

As of year-end 2024, the bank operated three branches and four deposit-taking ATMs in this rating area. The bank had $355.2 million in deposits in this rating area, which represented 0.2 percent of the bank's total adjusted deposits. This rating area was the bank's 15th largest in terms of deposits held. During the evaluation period, the bank made $67.3 million or 0.2 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked fifth out of 16 FDIC-insured depository institutions with a 5.9 percent deposit market share in this rating area. The top three competitors had 67.6 percent of the market share and included 1st Source Bank with 24 branches and 53.1 percent deposit market share, Lake City Bank with four

[7] MMSA ratings reflect performance within the multistate metropolitan statistical area. Statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

branches and 7.4 percent deposit market share, and JPMorgan Chase Bank, N.A. with two branches and 7.1 percent deposit market share.

South Bend MMSA AA

The following table provides a summary of the demographics, including housing and business information, for the South Bend MMSA AA.

Assessment Area - South Bend MMSA						
						2022 - 2024
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	97	9.28	23.71	38.14	27.84	1.03
Population by Geography	324,501	5.89	22.21	43.14	28.18	0.57
Housing Units by Geography	143,456	5.77	23.94	42.97	26.80	0.51
Owner-Occupied Housing by Geography	88,139	3.27	17.62	44.16	34.63	0.32
Occupied Rental Units by Geography	37,467	10.60	36.03	41.17	11.40	0.80
Vacant Units by Geography	17,850	8.01	29.78	40.81	20.51	0.89
Businesses by Geography	11,343	5.79	23.83	40.30	29.54	0.54
Farms by Geography	524	2.67	15.27	53.63	28.44	0.00
Family Distribution by Income Level	78,366	20.26	17.62	21.57	40.55	0.00
Household Distribution by Income Level	125,606	23.84	16.67	17.94	41.56	0.00
Unemployment rate (%)	5.04	11.01	8.05	3.84	3.56	6.23
Households Below Poverty Level (%)	13.69	36.28	20.76	12.61	4.65	35.41
Median Family Income (43780 - South Bend-Mishawaka, IN-MI MSA)		$70,437			**Median Housing Value**	$126,200
Median Family Income (43780 - South Bend-Mishawaka, IN-MI MSA) for 2024		$87,300			**Median Gross Rent**	$813
					Families Below Poverty Level	10.40
FFIEC File - 2020 Census						
FFIEC File - 2024 Census 2024 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

In the performance context, examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MMSA median housing value would be $677. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Based on the 2024 median family income, the calculated maximum affordable monthly mortgage payment was $1,091 for a low-income borrower and $1,746 for a moderate-income borrower. Based on these calculations, housing was affordable for most low-income borrowers and is affordable for moderate-income borrowers. Community contacts (see below) noted affordable housing continues to be a community need despite these calculations.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For this AA, 10.4 percent of families were living below the poverty level.

Economic Data

Data from the October 2024 Moody's Analytics report indicates the South Bend metro economy has moderated. Payroll growth has decelerated and falls below Indiana's average. The unemployment rate has been rising throughout 2024, exceeding state and national averages. Leisure/hospitality and construction have boosted employment. The University of Notre Dame provides stability to the local economy. Major employers include the University of Notre Dame, MSM Holdco LLC, St. Joseph's Regional Medical Center, Beacon Health System, and Press Ganey Associates Inc. House price growth, which was robust earlier in the year, has recently slowed. Sluggish population growth is due to South Bend having few economic drivers. Area strengths include affordable housing and a low cost of living, the presence of the University of Notre Dame, and low business costs. Weaknesses include few high-wage jobs in service industries, a low concentration of prime-age residents, below-average household incomes, and an aging population with poor migration trends.

According to the BLS, the non-seasonally adjusted unemployment rate for the South Bend MMSA was 3.9 percent as of January 2022 and rose to 4.7 percent as of December 2024. The national unemployment rate was 3.9 percent as of December 2024.

Community Contacts

Examiners reviewed information from three community contact interviews conducted during the evaluation period. The organizations contacted focused on affordable housing, small business and economic development, and community services. These contacts identified several major needs in the community, including affordable housing, healthcare, education, and the workforce. One contact noted that historically South Bend had been characterized as having affordable housing in comparison with other metropolitan areas; however, housing has become much less affordable over the past years. One contact said many members of the community prefer transacting in cash and remain outside of the mainstream financial systems and highlighted the need for banks to provide education on banking products and services and how financial products work. These sources identified the following needs and opportunities within the community:

- Funding for nonprofits to support a full-time position dedicated to financial education
- Banking services targeted to the unbanked and underbanked, including brick and mortar branches
- Funding for affordable housing developments
- Affordable housing, including single-family homes and rental housing
- Targeted outreach for first-time homebuyers

- Investment in the CDFI
- Support for LIHTC projects
- Financial education on managing education expenses, credit, and budgeting
- Financing for the demolition and construction of new multifamily housing
- Financial education and coaching for minorities and immigrants who don't understand bank processes
- Healthcare, education, and workforce development

Scope of Evaluation in the South Bend MMSA

Examiners conducted a full-scope review of the South Bend MMSA AA. Examiners placed more emphasis on home mortgage loans than small loans to businesses in arriving at the overall conclusion as they represented the majority of lending in the AA. The bank originated or purchased too few small loans to farms in this rating area to conduct a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE SOUTH BEND MMSA

LENDING TEST

The bank's performance under the Lending Test in the South Bend MMSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the South Bend MMSA was excellent.

Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Table 3: Lending Activity								**2022 - 2024**
Number of Loans								
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Consumer**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
South Bend MMSA	375	87	10	3	-	475	100.00	100.00
Broader Statewide or Regional Area	0	0	0	0	-	0	NA	NA
Total	**375**	**87**	**10**	**3**	**-**	**475**	**100.00**	**100.00**
Dollar Volume of Loans ($000s)								
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Consumer**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
South Bend MMSA	48,067	17,875	1,380	34,367	-	101,689	100.00	100.00
Broader Statewide or Regional Area	0	0	0	0	-	0	NA	NA

Total	**48,067**	**17,875**	**1,380**	**34,367**	**-**	**101,689**	**100.00**	**100.00**
Source: 1/1/2022 - 12/31/2024 Bank Data.								
Due to rounding, totals may not equal 100.0%								

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked fifth out of 16 FDIC-insured depository institutions (top 32 percent) with a 5.9 percent deposit market share.

For home mortgage loans, the bank's market share of 1.6 percent ranked 17th out of 330 lenders (top 6 percent). The top three lenders were Notre Dame Federal Credit Union with 11.7 percent market share, Everwise Credit Union with 7.9 percent market share, and 1st Source Bank with 7.4 percent market share.

For small loans to businesses, the bank's market share of 0.6 percent ranked 18th out of 77 lenders (top 24 percent). The top three lenders were JPMorgan Chase Bank, N.A. with 21 percent market share, American Express National Bank with 19.2 percent market share, and 1st Source Bank and Synchrony Bank, each with 9.8 percent market share. The top two small business lenders were institutions with large business credit card portfolios with average loan sizes of $14,000 or less. FTB's average small business loan size was $212,000, which is similar to the $210,000 average loan size for 1st Source Bank.

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AA. The distribution of both home mortgage loans and small loans to businesses was adequate.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans was adequate. The percentage of home mortgage loans originated or purchased in low-income geographies was significantly below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies exceeded both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was adequate. The percentage of small loans to businesses originated or purchased in low-income geographies was significantly below the percentage of businesses located in those geographies and was well below the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or

purchased in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AA. Examiners did not identify any unexplained conspicuous gaps in the full-scope area reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes. The distribution of home mortgage loans was excellent and the distribution of small loans to businesses was good.

Home Mortgage Loans

Refer to Table 8 in the MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was excellent. The percentage of home mortgage loans originated or purchased to low-income borrowers was near to the percentage of those families in the AA and exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded the percentage of those families in the AA and approximated the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table 10 in the MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was good. The percentage of loans to small businesses originated or purchased was below the percentage of small businesses in the AA but exceeded the aggregate percentage of all reporting lenders.

Community Development Lending

The institution was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.

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

The level of CD lending was excellent. During the evaluation period, FTB originated three CD loans totaling $34.4 million or 75.6 percent of allocated tier 1 capital. By dollar volume, 72.7 percent funded community services, 23.3 percent funded economic development, and 4 percent funded affordable housing. CD loans were responsive to identified community needs including affordable housing. The following are examples of CD loans the bank originated or purchased I the MMSA:

- A $1.4 million loan to a real estate holding company established to own an affordable housing apartment complex. All the 144 units qualify as affordable housing and are priced below 80 percent of the area median income.

- A $25 million loan to purchase a tax-exempt, non-bank qualified bond to finance the expansion of an existing healthcare facility, the construction of a new justice center, and other infrastructure improvements. The client is a sovereign nation, and the majority of its population are low- and moderate-income individuals.

Product Innovation and Flexibility

The institution made limited use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank originated or purchased 59 loans under its flexible lending programs totaling $7.1 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for details regarding the programs offered.

INVESTMENT TEST

The institution's performance under the Investment Test in the South Bend MMSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the South Bend MMSA was excellent.

Number and Amount of Qualified Investments

Table 4: Qualified Investments										
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
South Bend MMSA	5	607	5	4,432	10	100.00	5,039	100.00	0	0
Broader Statewide or Regional Area	0	0	0	0	0	0	0	0	0	0
Total	5	607	5	4,432	10	100.00	5,039	100.00	0	0

The institution had an excellent level of qualified investments, including grants, but not in a leadership position, particularly those that are not routinely provided by private investors. The

dollar volume of current and prior period investments represented 11.1 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community development needs. Investments were particularly responsive to affordable housing needs. The institution did not use innovative and/or complex investments to support CD initiatives. By dollar volume during the current period, 99.3 percent of total investments and grants supported affordable housing, 0.6 percent supported community services to low- and moderate-income individuals, and 0.1 percent promoted economic development. The following are examples of qualified investments in the MMSA:

- The bank made a $2.4 million investment in a multi-investor LIHTC fund for the renovation of a 168-unit affordable housing community.

- The bank made a $2 million investment in a multi-investor LIHTC fund to support construction of a 66-unit property, where 50 units are affordable housing and restricted to residents at 30 to 80 percent of the area median income.

SERVICE TEST

The institution's performance under the Service Test in the South Bend MMSA is rated High Satisfactory.

Based on a full-scope review, the institution's performance in the South Bend MMSA AA was good.

Retail Banking Services

Table 5: Distribution of Branch Delivery Systems													2024
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
South Bend MMSA	100.00	3	100.00	0.00	33.33	66.67	0.00	0.00	5.89	22.21	43.14	28.18	0.57
Total	100.00	3	100.00	0.00	33.33	66.67	0.00	0.00	5.89	22.21	43.14	28.18	0.57
Source: FFIEC File - 2024 Census *1/1/2022 - 12/31/2024 Bank Data* *Due to rounding, totals may not equal 100.0%*													

Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AA. The bank did not have branches in low-income geographies. The bank's distribution of branches in low-income geographies was significantly below, and in moderate-income geographies exceeded, the percentage of the population living within those geographies. Examiners considered one middle-income adjacent branch that was within 1,000 feet of a moderate-income geography within the AA, which further supported the retail Service Test conclusion.

The bank had several ADS including ATMs, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The bank had six ATMs in the AA, four of which were deposit-taking. Per data provided by the bank, as of the end of the evaluation period, bank customers located in low- and moderate-income geographies used online banking at a rate (46.5 percent) greater than customers in middle- and upper-income geographies (44.3 percent), and mobile banking usage rates amongst customers in low- and moderate-income geographies (59.3 percent) were also greater than that of customers in middle- and upper-income geographies (52.2 percent). During the evaluation period, online banking usage increased 0.6 percent for customers located in low- and moderate-income geographies and 11.6 percent for customers in middle- and upper-income geographies. Mobile banking usage decreased 8.8 percent for customers located in low- and moderate-income geographies and increased 12.3 percent for customers in middle- and upper-income geographies.

Table 6: Distribution of Branch Openings/Closings

Branch Openings/Closings							
Assessment Area	**# of Branch Openings**	**# of Branch Closings**	**Net change in Location of Branches (+ or -)**				
			Low	**Mod**	**Mid**	**Upp**	**NA**
South Bend MMSA	0	1	0	0	-1	0	0
Total	0	1	0	0	-1	0	0

1/1/2022 - 12/31/2024 Bank Data.

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, the bank closed one branch in a middle-income geography. The branch closure was a result of low productivity. The bank did not open any branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced, the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. Average hours of operation for the branch in a moderate-income geography were comparable to the branches in middle-income geographies. All three AA branches had the same lobby hours of 9:00 a.m. to 5:00 p.m. Monday through Thursday. On Friday, branches opened at 9:00 a.m., with one branch closing at 5:30 p.m. and two branches, including the one moderate-income branch, closing at 6:00 p.m. On Saturday branches opened at 9:00 a.m., with two branches closing at 12:00 p.m. and one middle-income branch closing at 1:00 p.m. All the branch locations had drive-thru facilities.

Community Development Services

The institution provided a relatively high level of CD services. During the evaluation period, two bank employees provided 87 hours of qualified CD service activities to one organization within this AA. The employees provided six financial education seminars to members of a local Native American tribe. The bank's assistance was responsive to an identified need in the AA for financial education.

State Rating

State of Florida

CRA rating for the State of Florida: Satisfactory
The Lending Test is rated: High Satisfactory
The Investment Test is rated: Outstanding
The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AA.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank made a relatively high level of CD loans. Overall, CD lending had a positive impact on the Lending Test conclusion.
- Performance in the limited-scope AAs was weaker than performance in the full-scope AAs and negatively impacted the Lending Test rating for the state of Florida.
- The bank had an excellent level of qualified CD investments and grants which were responsive in addressing community needs.
- Service delivery systems were overall accessible to geographies and individuals of different income levels in the institution's AAs with consideration for middle- and upper-income adjacent branches and ADS.
- The bank provided an overall adequate level of CD services. CD services were responsive in addressing community needs.

Description of Institution's Operations in Florida

The state of Florida consists of 11 AAs. They include the entirety of the Cape Coral-Fort Myers, FL MSA (Cape Coral MSA), the Lakeland-Winter Haven, FL MSA (Lakeland MSA), the Miami-Fort Lauderdale-West Palm Beach, FL MSA (Miami MSA), the Naples-Marco Island, FL MSA (Naples MSA), the North Port-Bradenton-Sarasota, FL MSA (North Port MSA), the Orlando-Kissimmee-Sanford, FL MSA (Orlando MSA), the Palm Bay-Melbourne-Titusville, FL MSA (Palm Bay MSA), and the Punta Gorda, FL MSA (Punta Gorda MSA), and a portion of the Deltona-Daytona Beach-Ormond Beach, FL MSA (Deltona MSA), the Jacksonville, FL MSA (Jacksonville MSA), and the Tampa-St. Petersburg-Clearwater, FL MSA (Tampa MSA). Refer to the table in appendix A for a list of counties reviewed.

As of year-end 2024, the bank operated 184 branches and 192 deposit-taking ATMs in this rating area. The bank had $17.9 billion in adjusted deposits in this rating area, which represented 10.9 percent of the bank's total adjusted deposits. This rating area was the bank's fifth largest in terms of deposits held. During the evaluation period, the bank made $5 billion or 18.7 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked 12th out of 156 FDIC-insured depository institutions with a 2.5 percent deposit market share in this rating area. The top three competitors had 41 percent of the market share and included Bank of America, N.A. with 384 branches and 20.2 percent deposit market share, Wells Fargo Bank, N.A. with 403 branches and 11 percent deposit market share, and JPMorgan Chase Bank, N.A. with 379 branches and 9.8 percent deposit market share.

Naples MSA AA

The following table provides a summary of the demographics, including housing and business information, for the Naples MSA AA.

Assessment Area - FS - Naples MSA						
						2022 - 2024
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	109	7.34	19.27	40.37	30.28	2.75
Population by Geography	375,752	7.07	21.76	40.24	29.77	1.16
Housing Units by Geography	218,348	3.78	16.32	41.46	37.26	1.18
Owner-Occupied Housing by Geography	110,083	2.25	17.43	40.69	38.39	1.24
Occupied Rental Units by Geography	37,894	12.23	23.87	42.06	21.05	0.78
Vacant Units by Geography	70,371	1.60	10.52	42.34	44.22	1.32
Businesses by Geography	29,665	2.81	14.69	40.44	41.03	1.03
Farms by Geography	905	8.95	24.09	36.91	28.62	1.44
Family Distribution by Income Level	98,121	21.93	18.03	19.55	40.49	0.00
Household Distribution by Income Level	147,977	23.74	16.82	16.90	42.53	0.00
Unemployment rate (%)	4.39	7.72	7.00	3.43	1.74	5.07
Households Below Poverty Level (%)	9.49	28.69	11.85	8.35	6.79	10.80
Median Family Income (34940 - Naples-Marco Island, FL MSA)		$84,784			**Median Housing Value**	$341,200
Median Family Income (34940 - Naples-Marco Island, FL MSA) for 2024		$104,300			**Median Gross Rent**	$1,421
					Families Below Poverty Level	7.06
FFIEC File - 2020 Census						
FFIEC File - 2024 Census 2024 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

The Naples MSA AA consisted of Collier County. As of year-end 2024, the bank operated 16 branches and 18 deposit-taking ATMs in this AA.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, the bank ranked first out of 38 FDIC-insured depository institutions with a 16.1 percent deposit market share in this AA.

In the performance context, examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be $1,832. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Based on the 2024 median family income, the calculated maximum affordable monthly mortgage payment was $1,304 for a low-income borrower and $2,086 for a moderate-income borrower. Based on these calculations, housing was affordable for moderate-income borrowers, but low-income borrowers would be challenged to qualify for and afford home mortgage financing in this AA.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For this AA, 7.1 percent of families were living below the poverty level.

Economic Data

Data from the August 2024 Moody's Analytics report indicates the Naples metro is in the late expansion part of the business cycle. Recent job growth was led by leisure/hospitality and construction, with healthcare providing steady support. Leisure and hospitality anchor the local economy, with this sector being particularly significant; the region ranks in the top 20 nationally for leisure/hospitality employment. Although Hurricane Ian impacted payrolls in 2022, the region rapidly recovered. Healthcare plays a crucial role in supporting the retiree-rich area. The Gulf Coast's appeal to seniors has bolstered hiring in hospitals and community care facilities. Major employers include NCH Healthcare System, Arthrex Inc. & Manufacturing, Publix Super Markets Inc., LFC Agricultural Services, Physicians Regional Medical Center, Ritz-Carlton Hotel Co. LLC, and Seminole Casino Immokalee. Housing affordability poses a challenge due to high home insurance premiums and elevated house prices. Naples has the second highest home insurance premium in the nation, behind Miami. Area strengths include a high quality of life and desirable weather that attracts retirees and tourists, population growth exceeding the state and national averages, and high per capita income. Weaknesses include exposure to hard-hit tourism, high cost of living, and home insurance costs that divert retirees to other states.

According to the BLS, the non-seasonally adjusted unemployment rate for the Naples MSA was 3.5 percent as of January 2022 and decreased to 3.1 percent as of December 2024. The national unemployment rate was 3.9 percent as of December 2024.

Community Contacts

Examiners reviewed information from two community contact interviews conducted during the evaluation period. The respondents consisted of an affordable housing provider and a workforce development entity. Leaders of these organizations emphasized the urgent need for flexible financing for housing development and property acquisition, financial education, and improved access to banking services, particularly in underbanked and low-income areas. It was expressed that support from financial institutions, both monetary and through volunteerism, could significantly aid affordable housing development and community empowerment. These sources identified that following needs and opportunities within the community:

- Lines of credit and small dollar loans for nonprofit organizations
- Service on boards, committees, and other volunteer opportunities
- Banking services targeted to the unbanked and underbanked, including brick and mortar branches
- Revival of previously funded money management programs in areas that lost funding
- Workforce development for youth, students in low-income schools, and low-income students
- Donations of bank-owned real estate or flexible financing for property acquisition
- Financial education and counseling programs, either in-person or virtually
- Providing grant funding and donations to support nonprofit operations and affordable housing initiatives
- Technical assistance and financing for both traditional and nontraditional affordable housing development, including mixed-use and commercial-to-residential conversions.

Tampa MSA AA

The following tables provide a summary of the demographics, including housing and business information, for the Tampa MSA AA for each evaluation period.

Assessment Area - FS - 2022-2023 Tampa MSA						
						2022 - 2023
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	741	4.72	27.13	35.90	29.01	3.24
Population by Geography	2,980,760	3.86	25.26	36.58	33.26	1.04
Housing Units by Geography	1,348,536	3.81	26.18	37.05	31.72	1.25
Owner-Occupied Housing by Geography	754,860	1.57	23.10	37.66	37.16	0.51
Occupied Rental Units by Geography	407,781	7.71	30.77	36.87	22.43	2.24
Vacant Units by Geography	185,895	4.34	28.61	34.98	29.99	2.08
Businesses by Geography	218,313	3.36	21.79	33.37	39.67	1.81
Farms by Geography	7,009	2.91	26.27	37.82	32.50	0.50
Family Distribution by Income Level	710,845	20.76	17.94	19.05	42.24	0.00
Household Distribution by Income Level	1,162,641	23.20	16.63	17.35	42.82	0.00
Unemployment rate (%)	5.28	9.71	7.03	5.06	3.93	3.87
Households Below Poverty Level (%)	12.46	34.04	17.66	11.43	6.81	16.31

Median Family Income (45300 - Tampa-St. Petersburg-Clearwater, FL MSA)	$71,769	**Median Housing Value**	$196,700
Median Family Income (45300 - Tampa-St. Petersburg-Clearwater, FL MSA) for 2023	$89,400	**Median Gross Rent**	$1,138
		Families Below Poverty Level	8.85
FFIEC File - 2020 Census			
2023 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification			

Assessment Area - FS - 2024 Tampa MSA						
						2024
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	741	4.72	27.80	35.49	28.74	3.24
Population by Geography	2,980,760	3.93	25.89	35.63	33.51	1.04
Housing Units by Geography	1,348,536	3.69	27.45	36.11	31.51	1.25
Owner-Occupied Housing by Geography	754,860	1.56	23.98	36.84	37.11	0.51
Occupied Rental Units by Geography	407,781	7.55	32.01	35.49	22.71	2.24
Vacant Units by Geography	185,895	3.84	31.52	34.47	28.09	2.08
Businesses by Geography	202,913	3.10	21.65	32.72	41.02	1.51
Farms by Geography	6,477	2.81	25.68	36.44	34.72	0.36
Family Distribution by Income Level	710,845	20.68	17.93	19.11	42.28	0.00
Household Distribution by Income Level	1,162,641	23.19	16.61	17.36	42.84	0.00
Unemployment rate (%)	5.28	9.84	6.82	5.12	3.96	3.87
Households Below Poverty Level (%)	12.46	33.58	17.57	11.33	6.91	16.31
Median Family Income (41304 - St. Petersburg-Clearwater-Largo, FL MD)		$75,478			**Median Housing Value**	$196,700
Median Family Income (45294 - Tampa, FL MD)		$69,728			**Median Gross Rent**	$1,138
Median Family Income (41304 - St. Petersburg-Clearwater-Largo, FL MD) for 2024		$97,300			**Families Below Poverty Level**	8.85
Median Family Income (45294 - Tampa, FL MD) for 2024		$88,800				
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

The Tampa MSA AA consisted of Hillsborough, Pasco, and Pinellas counties. As of year-end 2024, the bank operated 46 branches and 47 deposit-taking ATMs in this AA.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, the bank ranked seventh out of 54 FDIC-insured depository institutions with a 3.3 percent deposit market share in this AA. The top three competitors had 53.6 percent of the market share and included Raymond James Bank with one branch and 30.9 percent deposit market share, Bank of America, N.A with 60 branches and 11.6 percent deposit market share, and Truist Bank with 78 branches and 11.1 percent deposit market share.

In the performance context, examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be $1,056. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Based on the 2023 and 2024 median family income, the calculated maximum affordable monthly mortgage payment ranged between $1,110 and $1,216 for a low-income borrower and between $1,776 and $1,946 for a moderate-income borrower, depending on the MD. Based on these calculations, housing was affordable for both low- and moderate-income borrowers. However, one community contact discussed home affordability challenges, including rapidly rising insurance premiums in the last few years.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For this AA, 8.9 percent of families were living below the poverty level.

Economic Data

Data from the November 2024 Moody's Analytics report indicates the Tampa metro's economy was stable and in the mid-expansion part of the business cycle. Prior to being hit by Category 3 Hurricane Milton, which temporarily disrupted the economy, Tampa's payroll growth was leading the state average for the first time in over a year. The unemployment rate was low and stable. Major employers include Publix Super Markets Inc., BayCare Health System, HCA Florida Healthcare, MacDill Air Force Base, University of South Florida (System), and AdventHealth West Florida Division. The housing market slowed sharply, with price appreciation falling nearly 4 percentage points below the national average. The Tampa metro area has the fourth highest share of residents over age 65 of all metros with over one million residents. Area strengths include it being the financial services capital of the state, low tax burden and office rents, strong demographic trends including robust and increasing net migration, and a high quality of life with strong tourism assets. Weaknesses include a decreasing affordability advantage over southern peer metros.

According to the BLS, the non-seasonally adjusted unemployment rate for the Tampa MSA was 3.6 percent as of January 2022 and decreased to 3.3 percent as of December 2024. The national unemployment rate was 3.9 percent as of December 2024.

Community Contacts

Examiners reviewed information from three community contact interviews conducted during the evaluation period. The respondents consisted of an economic development corporation and two CDFIs. One of the CDFIs was also a HUD-approved housing counseling agency. The organizations emphasized the need for more robust partnerships with banks to support small business growth, affordable homeownership, and nonprofit capacity. One contact discussed the

home affordability challenges, including skyrocketing insurance premiums in the last few years. Banks were encouraged to expand their presence in loan programs, downpayment assistance, and nonprofit development efforts. These sources identified the following needs and opportunities within the community:

- Small business loans to support start-up businesses
- Utilizing downpayment assistance programs along with state and local government subsidies to make homeownership accessible
- Partnering with CDFIs for lending and investment opportunities
- Flexible home purchase underwriting standards
- Funding for nonprofits to train and retain certified housing counselors
- Service on boards, committees, and other volunteer opportunities
- Financing for the preservation or development of multifamily and single-family housing that can be leveraged with federal, state and local programs
- Funding to subsidize the gap between development costs and affordability
- Providing construction revolving lines of credit for nonprofits to build single-family homes that will be sold to low- and moderate-income buyers
- Financial literacy education

Scope of Evaluation in Florida

Examiners selected two AAs for full-scope reviews. Examiners conducted a full-scope review of the Naples MSA AA and the Tampa MSA AA.

The Naples MSA AA accounted for 16.8 percent of deposits, 8.7 percent of branches, and 8.1 percent of lending within the state during the evaluation period. Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked first out of 38 FDIC-insured depository institutions with a 16.1 percent deposit market share. FTB closed three branches in this AA during the evaluation period.

The Tampa MSA AA accounted for 22.4 percent of deposits, 25 percent of branches, and 9.3 percent of lending within the state during the evaluation period. Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked seventh out of 54 FDIC-insured depository institutions with a 3.3 percent deposit market share. FTB closed two branches in this AA during the evaluation period.

The Cape Coral MSA, Deltona MSA, Jacksonville MSA, Lakeland MSA, Miami MSA, North Port MSA, Orlando MSA, Palm Bay MSA, and Punta Gorda MSA AAs received limited-scope reviews. Refer to the table in appendix A for more information.

Examiners based their ratings primarily on the results of the areas that received the full-scope reviews and the bank's performance in the limited-scope areas. The Tampa MSA AA was the most heavily weighted when arriving at the overall conclusion for the state of Florida.

Examiners placed more emphasis on home mortgage loans than small loans to businesses in arriving at the overall conclusion as they represented the majority of lending in all AAs in this

rating area. The bank originated or purchased too few small loans to farms in this rating area to conduct a meaningful analysis.

On June 16, 2023, FTB opened a deposit-taking ATM in Brevard County, Florida, creating the Palm Bay-Melbourne-Titusville, FL MSA AA (Palm Bay MSA) as of 2023. The Palm Bay MSA AA will be included in this evaluation for 2023 through 2024.

On December 17, 2024, FTB opened a branch in Marion County, creating the Ocala, FL MSA AA. This AA will not be included in this evaluation because the bank entered this county and AA less than six months before the end of the evaluation period and the analysis would not be meaningful.

On December 19, 2024, FTB opened a branch in Sumter County, creating the Wildwood-The Villages, FL MSA AA. This AA will not be included in this evaluation because the bank entered this county and AA less than six months before the end of the evaluation period and the analysis would not be meaningful.

For the Tampa AA, FTB's delineated AA did not change during the evaluation period; however, the Tampa MSA was divided into two MDs in 2024, which resulted in the need for two separate analyses for this AA.

Bank delineated AAs located in the same MSA are combined, analyzed, and presented as one AA for purposes of this evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA

LENDING TEST

The bank's performance under the Lending Test in Florida is rated High Satisfactory. Weaker performance in the limited-scope AAs negatively impacted and lowered the Lending Test rating for the state of Florida.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Naples MSA AA was good and in the Tampa MSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to the credit needs of the AAs.

Table 3: Lending Activity **2022 - 2024**

Number of Loans

Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Naples MSA	865	446	0	1	-	1,312	8.13	16.77
Tampa MSA	1,141	348	0	7	-	1,496	9.27	22.35
Cape Coral MSA	1,322	368	0	4	-	1,694	10.49	12.17
Deltona MSA	562	140	0	2	-	704	4.36	2.72
Jacksonville MSA	976	249	0	2	-	1,227	7.60	6.57
Lakeland MSA	455	93	0	0	-	548	3.39	0.99
Miami MSA	2,777	469	0	5	-	3,251	20.14	10.66
North Port MSA	1,377	360	2	2	-	1,741	10.78	10.04
Orlando MSA	2,563	1,121	1	6	-	3,691	22.86	16.19
Palm Bay MSA	135	18	0	0	-	153	0.95	0.00
Punta Gorda MSA	286	42	0	0	-	328	2.03	1.54
Broader Statewide or Regional Area	0	0	0	0	-	0	NA	NA
Total	**12,459**	**3,654**	**3**	**29**	-	**16,145**	**100.00**	**100.00**

Dollar Volume of Loans ($000s)

Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Naples MSA	320,248	40,063	0	750	-	361,061	7.78	16.77
Tampa MSA	350,728	37,060	0	83,379	-	471,167	10.15	22.35
Cape Coral MSA	321,241	47,354	0	43,890	-	412,485	8.89	12.17
Deltona MSA	127,474	17,449	0	9,053	-	153,976	3.32	2.72
Jacksonville MSA	282,700	47,986	0	750	-	331,436	7.14	6.57
Lakeland MSA	106,337	7,580	0	0	-	113,917	2.45	0.99
Miami MSA	1,116,253	112,779	0	59,117	-	1,288,149	27.76	10.66
North Port MSA	378,252	46,529	45	42,000	-	466,826	10.06	10.04
Orlando MSA	709,056	142,090	500	65,120	-	916,766	19.76	16.19
Palm Bay MSA	46,791	4,301	0	0	-	51,092	1.10	0.00
Punta Gorda MSA	65,961	7,611	0	0	-	73,572	1.59	1.54
Broader Statewide or Regional Area	0	0	0	0	-	0	NA	NA
Total	**3,825,041**	**510,802**	**545**	**304,059**	-	**4,640,447**	**100.00**	**100.00**

Source: 1/1/2022 - 12/31/2024 Bank Data.

Due to rounding, totals may not equal 100.0%

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

Naples MSA AA

Lending levels reflected excellent responsiveness to AA credit needs.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked first out of 38 FDIC-insured depository institutions with a 16.1 percent deposit market share.

For home mortgage loans, the bank's market share of 1.9 percent ranked 12th out of 686 lenders (top 2 percent). The top three lenders were Crosscountry Mortgage, LLC with 5.2 percent market share, Suncoast Credit Union with 4.9 percent market share, and United Wholesale Mortgage with 4.6 percent market share.

For small loans to businesses, the bank's market share of 0.9 percent ranked 14th out of 137 lenders (top 11 percent). The top three lenders were American Express National Bank with 28.6 percent market share, JPMorgan Chase Bank, N.A. with 18.6 percent market share, and Bank of America, N.A. with 10.5 percent market share. The top small business lenders were institutions with large business credit card portfolios with average loan sizes of $22,000 or less. FTB's average small business loan size was $85,000.

Tampa MSA AA

Lending levels reflected excellent responsiveness to AA credit needs.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked seventh out of 54 FDIC-insured depository institutions (top 13 percent) with a 3.3 percent deposit market share.

For home mortgage loans, the bank's market share of 1 percent ranked 21st out of 1,032 lenders (top 3 percent). The top three lenders were United Wholesale Mortgage with 7.6 percent market share, PennyMac Loan Services LLC with 5.3 percent market share, and Rocket Mortgage with 4.8 percent market share.

For small loans to businesses, the bank's market share of 0.3 percent ranked 23rd out of 198 lenders (top 12 percent). The top three lenders were American Express National Bank with 28.4 percent market share, JPMorgan Chase Bank, N.A. with 20.7 percent market share, and Bank of America, N.A. with 11.1 percent market share. The top small business lenders were institutions with large business credit card portfolios with average loan sizes of $22,000 or less. FTB's average small business loan size was $148,000.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AAs. The geographic distribution of home mortgage loans was good and the geographic distribution of small loans to businesses was excellent.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans was good. The geographic distribution in both the Naples MSA AA and the Tampa MSA AA was good.

Naples MSA AA

The geographic distribution of home mortgage loans was good. The percentage of home mortgage loans originated or purchased in low-income geographies was significantly below the percentage of owner-occupied housing units located in those geographies and was below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies exceeded the percentage of owner-occupied housing units located in those geographies and exceeded the aggregate percentage of all reporting lenders.

Tampa MSA AA

The geographic distribution of home mortgage loans was good. For 2022-2023, the geographic distribution of home mortgage loans was adequate. For 2024, the geographic distribution of home mortgage loans was excellent.

2022-2023
The geographic distribution of home mortgage loans in the 2022-2023 analysis period was adequate. The percentage of home mortgage loans originated or purchased in low-income geographies was below the percentage of owner-occupied housing units located in those geographies and was below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies was below the percentage of owner-occupied housing units located in those geographies and was below the aggregate percentage of all reporting lenders.

2024
The geographic distribution of home mortgage loans in 2024 was excellent. The percentage of home mortgage loans originated or purchased in low-income geographies approximated the percentage of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in moderate-income geographies exceeded the percentage of owner-occupied housing units located in those geographies.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was excellent. The geographic distribution in both the Naples MSA AA and the Tampa MSA AA was excellent.

Naples MSA AA

The geographic distribution of small loans to businesses was excellent. The percentage of small loans to businesses originated or purchased in low-income geographies was near to the percentage of businesses located in those geographies and exceeded the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded the percentage of businesses located in those geographies and exceeded the aggregate percentage of all reporting lenders.

Tampa MSA AA

The geographic distribution of small loans to businesses was excellent.

2022-2023

The geographic distribution of small loans to businesses in the 2022-2023 analysis period was excellent. The percentage of small loans to businesses originated or purchased in low-income geographies exceeded the percentage of businesses located in those geographies and exceeded the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded the percentage of businesses located in those geographies and exceeded the aggregate percentage of all reporting lenders.

2024

The geographic distribution of small loans to businesses in 2024 was excellent. The percentage of small loans to businesses originated or purchased in low-income geographies exceeded the percentage of businesses located in those geographies. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded the percentage of businesses located in those geographies.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AAs. Examiners did not identify any unexplained conspicuous gaps in the full-scope AAs reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution. The distribution of home mortgage to individuals of different income levels was good. The distribution of loans to businesses of different sizes was good.

Home Mortgage Loans

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

The distribution of home mortgage loans among individuals of different income levels was good. The distribution of home mortgage loans in the Naples MSA AA was excellent and the distribution in the Tampa MSA AA was good.

Naples MSA AA

The distribution of home mortgage loans among individuals of different income levels was excellent. The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below the percentage of those families in the AA but exceeded the aggregate percentage of all reporting lenders. Based on housing affordability calculations, discussed above, housing in the AA is not affordable for low-income borrowers; therefore, more emphasis was given to the bank's performance compared to other lenders in the AA. The percentage of home mortgage loans originated or purchased to moderate-income borrowers approximated the percentage of those families in the AA and exceeded the aggregate percentage of all reporting lenders.

Tampa MSA AA

The distribution of home mortgage loans among individuals of different income levels was good.

2022-2023
The distribution of home mortgage loans among individual of different income levels during the 2022-2023 analysis period was good. The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below the percentage of those families in the AA but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers was near to the percentage of those families in the AA and exceeded the aggregate percentage of all reporting lenders.

2024
The distribution of home mortgage loans during the 2024 analysis period was adequate. The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded the percentage of those families in the AA.

Small Loans to Businesses

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

The distribution of loans to businesses of different sizes was good. The distribution of loans to businesses of different sizes in the Naples MSA AA was excellent and the distribution of loans in the Tampa MSA AA was good.

Naples MSA AA

The distribution of loans to businesses of different sizes was excellent. The percentage of loans to small businesses originated or purchased was near to the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders. More emphasis was placed on the bank's lending when compared to all reporting lenders in the AA, as the bank's lending to small businesses was 1.5 times that of other lenders.

Tampa MSA AA

The distribution of loans to businesses of different sizes was good.

2022-2023
The distribution of loans to businesses of different sizes during the 2022-2023 analysis period was good. The percentage of loans to small businesses originated or purchased was below the percentage of small businesses in the AA but exceeded the aggregate percentage of all reporting lenders.

2024
The distribution of loans to businesses of different sizes during the 2024 analysis period was adequate. The percentage of loans to small businesses originated or purchased was below the percentage of small businesses in the AA.

Community Development Lending

The institution made a relatively high level of CD loans.

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

Naples MSA AA

The level of CD lending was poor. CD lending had a negative impact on the Lending Test conclusion. During the evaluation period, FTB originated one CD loan totaling $750,000 or 0.2 percent of allocated tier 1 capital. The loan was to a community services organization that provides services to primarily low- and moderate-income individuals. The loan funds supported early learning, including after school and summer camp programs that provide educational, fitness, and learning projects.

Tampa MSA AA

The level of CD lending was excellent. CD lending had a positive impact on the Lending Test conclusion. During the evaluation period, FTB originated seven CD loans totaling $83.4 million or 16.3 percent of allocated tier 1 capital. By dollar volume, 90.5 percent funded affordable housing, 7.7 percent funded economic development, and 1.8 percent funded community services. CD loans were responsive to identified community needs including affordable housing. The following are examples of CD loans the bank originated or purchased in the AA:

- A $47 million bridge loan to finance the construction of a 196-unit affordable multifamily apartment complex for low- and moderate-income families. The project was complex and included multiple financial institutions, the Housing Authority of the City of Tampa, and tax credit funds.

- A $1 million small business loan to create a wellness hub for low- and moderate-income families of the East Tampa neighborhood. The hub addresses the need for easy access to health care in a neighborhood with a median income $17,000 lower than the city median. In addition to medications, the pharmacy will provide one-on-one patient care.

- A $12.5 million construction loan to finance an affordable senior living community in Seffner, Florida. The four-story building will contain 140 units, all to individuals earning below 80 percent of the area median income. The overall cost of the transaction was $42 million. The project was complex as it had several financing sources and partners including LIHTCs, other financial institutions, charitable organizations, and a housing authority.

Product Innovation and Flexibility

The institution used innovative and/or flexible lending practices in order to serve the credit needs of the AAs. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for details regarding the programs offered.

Naples MSA AA

The institution used innovative and/or flexible lending practices in order to serve AA credit needs. The bank originated or purchased 135 loans under its flexible lending programs totaling $16.4 million.

Tampa MSA AA

The institution made extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank originated or purchased 643 loans under its flexible lending programs totaling $158.8 million.

Conclusions for Areas Receiving Limited-Scope Reviews

Refer to Tables 7 through 10 in the state of Florida section of appendix D for the facts and data that support the limited-scope conclusions.

Based on limited-scope reviews, the bank's performance under the Lending Test in the Deltona MSA AA and Orlando MSA AA was consistent with the bank's overall performance under the Lending Test in the full-scope areas. The bank's performance under the Lending Test in the Cape Coral MSA AA, Jacksonville MSA AA, Lakeland MSA AA, Miami MSA AA, North Port MSA AA, Palm Bay MSA AA, and Punta Gorda MSA AAwas weaker than the bank's overall performance under the Lending Test in the full-scope areas. The weaker performance in the Cape Coral MSA AA and North Port MSA AA was due to a weaker geographic distribution of loans. The weaker performance in the Jacksonville MSA AA was due to weaker geographic and borrower distribution of loans. The weaker performance in the Lakeland MSA AA and Palm Bay MSA AA was due to weaker geographic and borrower distribution of loans and the lack of CD lending. The weaker performance in the Miami MSA AA was due to a weaker borrower distribution of loans. The weaker performance in the Punta Gorda MSA AA was due to a weaker geographic distribution of loans and no CD lending. Performance in the limited-scope AAs was weaker than performance in the full-scope AAs and negatively impacted the Lending Test rating for the state of Florida.

INVESTMENT TEST

The bank's performance under the Investment Test in Florida is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in both the Naples MSA AA and Tampa MSA AA was excellent.

Table 4: Qualified Investments*										
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Naples MSA	4	5,345	4	22,728	8	6.50	28,073	8.86	0	0
Tampa MSA	9	32,672	17	59,686	26	21.24	92,358	29.13	0	0
Cape Coral MSA	5	18,038	4	16,866	9	7.32	34,904	11.01	0	0
Deltona MSA	1	843	2	4,002	3	2.44	4,845	1.53	0	0
Jacksonville MSA	3	3,260	4	11,946	7	5.69	15,207	4.80	0	0
Lakeland MSA	4	8,170	2	7,364	6	4.88	15,534	4.90	0	0
Miami MSA	8	21,907	7	10,989	15	12.20	32,896	10.38	0	0
North Port MSA	5	5,991	8	15,270	13	10.57	21,261	6.71	0	0
Orlando MSA	16	44,209	15	14,766	31	25.20	58,975	18.60	0	0
Palm Bay MSA	0	0	0	0	0	0.00	0	0.00	0	0
Punta Gorda MSA	0	0	1	2	1	0.81	2	0.00	0	0
Broader Statewide or Regional Area	3	1,331	1	11,615	4	3.25	12,946	4.08	0	0
Total	58	141,766	65	175,234	123	100.00	317,001	100.00	0	0

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

Naples MSA AA

The institution had an excellent level of qualified investments, including grants, but not in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current and prior period investments represented 7.3 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community development needs. Investments were particularly responsive to affordable housing needs. The institution did not use innovative and/or complex investments to support CD initiatives. By dollar volume during the current period, 99.9 percent of total investments and grants supported affordable housing and 0.1 percent supported community services to low- and moderate-income individuals. The following are examples of qualified investments in the AA:

- The bank made two investments totaling $9.5 million in a multi-investor LIHTC fund to support the development of a 184-unit affordable housing development, where 11 units are restricted to 50 percent of the area median income and the remaining 173 units are restricted to 60 percent of the area median income.

- The bank made a $13.2 million investment in a multi-investor LIHTC fund to support the development of a 160-unit affordable housing development, where 16 units are restricted to 30 percent of the area median income, 80 units are restricted to 50 percent of the area median income, and the remaining 64 units are restricted to 80 percent of the area median income.

Tampa MSA AA

The institution had an excellent level of qualified investments, including grants, but not in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current and prior period investments represented 18.1 percent of allocated tier 1 capital.

The institution exhibited good responsiveness to credit and community development needs. The institution did not use innovative and/or complex investments to support CD initiatives. By dollar volume during the current period, 51.3 percent of total investments and grants supported affordable housing, 48.2 percent promoted economic development, 0.4 percent funded revitalization and stabilization efforts, and 0.1 percent supported community services to low- and moderate-income individuals. The following are examples of responsive, qualified investments in the AA:

- The bank made a $15.3 million investment in a multi-investor LIHTC fund to construct a 140-unit affordable housing development for seniors, where five units are restricted to 22 percent of the area median income, 14 units are restricted to 33 percent of the area median income, and the remaining 121 units are restricted to 60 percent of the area median income. The bank demonstrated a multifaceted approach that also included $12.5 million in construction financing.

- The bank made a $14.9 million investment in a multi-investor LIHTC fund to construct 75 units of affordable housing for seniors.

- The bank made a $5,000 grant to a nonprofit organization that provides essential home repair and landscaping free of charge to low- and moderate-income families. The investment helped repair 10 homes.

Broader Statewide or Regional Area

In addition, the bank made four investments totaling $12.9 million in projects or organizations in the BSRA whose purpose, mandate, or function included serving the bank's AA. Of these, three investments were from the prior period with a remaining book value of $1.3 million. The BSRA investments supported the overall Investment Test conclusion.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Cape Coral MSA AA, Deltona MSA AA, Jacksonville MSA AA, Lakeland MSA AA, Miami MSA AA, North Port MSA AA, and Orlando MSA AA was consistent with the bank's overall performance under the Investment Test in the full-scope areas. Performance under the Investment Test in the Palm Bay MSA AA and the Punta Gorda MSA AA was weaker than the bank's overall performance under the Investment Test in the full-scope areas due to a lower level of investment. Performance in the limited-scope AAs had minimal impact on the overall state rating.

SERVICE TEST

The bank's performance under the Service Test in Florida is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Naples MSA AA was adequate and in the Tampa MSA AA was excellent.

Retail Banking Services

Table 5: Distribution of Branch Delivery Systems														2024
Assessment Area	Deposits	Branches							Population					
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography					
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA	
Naples MSA	16.77	16	8.70	0.00	12.50	43.75	43.75	0.00	7.07	21.76	40.24	29.77	1.16	
Tampa MSA	22.35	46	25.00	6.52	17.39	34.78	34.78	6.52	3.93	25.89	35.63	33.51	1.04	
Cape Coral MSA	12.17	19	10.33	0.00	15.79	52.63	26.32	5.26	2.30	23.68	46.74	26.44	0.84	
Deltona MSA	2.72	5	2,72	0.00	20.00	60.00	20.00	0.00	3.10	15.40	57.55	23.95	0.00	
Jacksonville MSA	6.57	15	8.15	0.00	40.00	20.00	40.00	0.00	5.28	25.79	39.40	28.94	0.59	
Lakeland MSA	0.99	3	1.63	0.00	100.00	0.00	0.00	0.00	1.03	23.65	48.29	25.98	1.05	
Miami MSA	10.66	19	10.33	0.00	26.32	26.32	47.37	0.00	4.71	27.97	31.44	34.36	1.51	
North Port MSA	10.04	23	12.50	0.00	8.70	56.52	34.78	0.00	2.22	22.33	43.64	31.64	0.17	
Orlando MSA	16.19	33	17.93	3.03	21.21	30.30	42.42	3.03	3.75	26.70	35.64	32.89	1.02	
Palm Bay MSA	0.00	2	1.09	0.00	0.00	0.00	100.00	0.00	2.65	21.38	45.03	30.50	0.44	
Punta Gorda MSA	1.54	3	1.63	0.00	0.00	33.33	66.67	0.00	0.00	16.53	66.69	16.78	0.00	
Total	100.00	184	100.00	2.20	19.78	36.81	38.46	2.75	3.97	25.70	37.34	31.93	1.05	
Source: FFIEC File - 2024 Census *1/1/2022 - 12/31/2024 Bank Data* *Due to rounding, totals may not equal 100.0%*														

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

Naples MSA AA

Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the institution's AA. The bank had no branches in low-income geographies. The bank's distribution of branches in low-income geographies was significantly below, and in moderate-income geographies was below, the percentage of the population living within those geographies. Examiners considered three middle- or upper-income adjacent branches that were within 1,000 feet of low- or moderate-income geographies within the AA. These branches improved accessibility and had a positive impact on the retail Service Test conclusion.

The bank had several ADS including ATMs, online banking and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers and were positively considered in the service delivery systems conclusion. The bank had 26 ATMs in the AA, 18 of which were deposit-taking. Per data

provided by the bank, as of the end of the evaluation period, bank customers located in low- and moderate-income geographies used online banking at a rate (35 percent) less than customers in middle- and upper-income geographies (44.6 percent), while mobile banking usage rates amongst customers in low- and moderate-income geographies (64.5 percent) were higher than that of customers in middle- and upper-income geographies (51.9 percent). During the evaluation period, online banking usage decreased 0.9 percent for customers located in low- and moderate-income geographies and increased 0.4 percent for customers in middle- and upper-income geographies. Mobile banking usage increased 26.2 percent for customers in low- and moderate-income geographies and 18.9 percent for customers in middle- and upper-income geographies.

Tampa MSA AA

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income geographies exceeded, and in moderate-income geographies was below, the percentage of the population living within those geographies. Examiners further considered seven middle- or upper-income adjacent branches that were within 1,000 feet of low- or moderate-income geographies within the AA. These branches improved accessibility and had a positive impact on the retail Service Test conclusion.

The bank had several ADS including ATMs, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers and were positively considered in the service delivery systems conclusion. The bank had 84 ATMs in the AA, 47 of which were deposit-taking. Per data provided by the bank, as of the end of the evaluation period, bank customers located in low- and moderate-income geographies used online banking at a rate (41.1 percent) less than customers in middle- and upper-income geographies (47.8 percent), while mobile banking usage rates amongst customers in low- and moderate-income geographies (62.6 percent) were higher than that of customers in middle- and upper-income geographies (59.2 percent). During the evaluation period, online banking usage rates decreased 1.4 percent for customers located in low- and moderate-income geographies and increased 2.0 percent for customers in middle- and upper-income geographies. Mobile banking usage increased 15.1 percent for customers in low- and moderate-income geographies and increased 14.5 percent for customers in middle- and upper-income geographies.

Table 6: Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Naples MSA	3	3	0	0	1	-1	0
Tampa MSA	9	2	0	1	3	3	0
Cape Coral MSA	1	1	0	-1	0	1	0
Deltona MSA	0	0	0	0	0	0	0
Jacksonville MSA	5	1	0	1	1	2	0
Lakeland MSA	0	0	0	0	0	0	0
Miami MSA	10	0	0	3	3	4	0
North Port MSA	5	2	0	0	0	3	0
Orlando MSA	2	2	0	0	-1	1	0
Palm Bay MSA	2	0	0	0	0	2	0
Punta Gorda MSA	1	0	0	0	0	1	0
Total	38	11	0	4	7	16	0
1/1/2022 - 12/31/2024 Bank Data.							

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

Naples MSA AA

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, the bank closed three branches, none of which were in low- or moderate- income geographies. The branch closures were the result of branch consolidation and relocations that provided improved convenience and visibility for customers. The bank also opened three branches during the evaluation period, none of which were in low- or moderate-income geographies.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly low- and moderate-income geographies and/or individuals. The bank maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. Average hours of operation were comparable between the moderate-income branches and the middle- and upper-income branches. All 16 branches had the same lobby hours of 9:00 a.m. to 5:00 p.m. Monday through Thursday, and 9:00 a.m. to 6:00 p.m. on Friday. Fifteen branches were open from 9:00 a.m. to 12:00 p.m. on Saturdays, including both moderate-income branches. There were also 15 locations with drive-thru facilities, including both branches located in moderate-income geographies.

Tampa MSA AA

To the extent changes have been made, the institution's opening and closing of branches has improved the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, the bank closed two branches, neither of which were in low- or moderate- income geographies. The branch closures were the result of relocations that provided improved convenience and visibility

for customers. The bank also opened nine branches during the evaluation period, one of which was in a moderate-income geography.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly low- and moderate-income geographies and/or individuals. The bank maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. Average hours of operation were comparable between the low- and moderate-income branches and the middle- and upper-income branches. All 46 branches had the same lobby hours of 9:00 a.m. to 5:00 p.m. Monday through Thursday, and 9:00 a.m. to 6:00 p.m. on Fridays except for one upper-income branch that was only open until 5:00 p.m. on Fridays. Of the 46 branches in the AA, 40 were open on Saturday from 9:00 a.m. until 12:00 p.m., including all three low-income branches and six of the eight moderate-income branches. There were 43 locations with drive-thru facilities, including all 11 low- and moderate-income branch locations.

Community Development Services

Naples MSA AA

The institution provided a relatively high level of CD services. During the evaluation period, bank employees provided 393 hours of qualified CD service activities to eight organizations within this AA. Leadership is evident through board or committee participation, with six employees providing 354 service hours. Additionally, the bank hosted seven eBus events in the Naples MSA benefiting 267 individuals, including one event held in the wake of Hurricane Ian that heavily impacted the Naples MSA. The bank's assistance was responsive to identified needs in the AA, particularly with board participation and financial education. Service activity examples during the evaluation period include:

- A senior vice president at the bank served on the board of an organization that works to fight hunger, homelessness, addiction and poverty in southwest Florida. The employee provided 98 service hours during the evaluation period.

- A bank employee provided 30 hours of board service to an area nonprofit that supports educational success in Collier County by investing in its students and educators.

- The bank hosted two eBus events and provided 49 hours of financial education at an area nonprofit organization that helps provide pathways out of poverty by educating children and families. Services provided through the eBus event included helping community members access credit reports, open new accounts, and connect with social services resources. A bank vice president also serves on the board for this organization, providing 30 service hours during the evaluation period.

Tampa MSA AA

The institution provided an adequate level of CD services. During the evaluation period, bank employees provided 427 hours of qualified CD service activities to 16 organizations within this

AA. Leadership is evident through board or committee participation, with five employees providing 58 service hours. Additionally, the bank hosted 13 eBus and Banking to Go events in the Tampa MSA benefiting 1,034 individuals. Several of these events helped provide needed resources during the aftermath of Hurricanes Ian, Helene, and Milton that hit the area during the evaluation period. The bank's assistance was responsive to identified needs in the AA, particularly with board participation and financial education. Service activity examples during the evaluation period include:

- Bank employees provided 119 hours of financial education as part of an immersive program for area 5th graders that simulates a real-world economy where students learn essential skills in personal finance and critical thinking.

- A bank employee provided 80 hours of one-on-one financial education training sessions in coordination with a statewide nonprofit organization that works to support vulnerable Floridians. The training aimed to help individuals living in poverty gain the knowledge to improve their financial futures.

- The bank hosted two eBus events at an area nonprofit organization whose mission is to alleviate poverty and physical deterioration in East Tampa. Through these events over 500 individuals from this low- and moderate-income community benefited from financial education and other services. In addition, two bank employees supported this organization through board participation and technical assistance amounting to 41 service hours.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's retail service delivery systems performance under the Service Test in the Deltona MSA, Miami MSA and Orlando MSA AAs was consistent with the bank's overall retail service delivery systems performance in the full-scope areas. The bank's retail service delivery systems performance under the Service Test in the Lakeland MSA AA was stronger than the bank's overall retail service delivery systems performance in the full-scope areas due to a stronger branch distribution. The bank's retail service delivery systems performance under the Service Test in the Cape Coral MSA, Jacksonville MSA, North Port MSA, Palm Bay MSA, and Punta Gorda MSA AAs was weaker than the bank's overall retail service delivery systems performance in the full-scope areas due to weaker branch distributions. Performance differences in the limited-scope AAs had minimal impact on the overall state rating.

State of Georgia

CRA rating for the State of Georgia: Outstanding
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected good responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AA.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments and grants which were responsive in addressing community needs.
- Service delivery systems were overall accessible to geographies and individuals of different income levels in the institution's AAs with consideration for middle- and upper-income adjacent and proximate branches and ADS.
- The bank provided a relatively high level of CD services. CD services were responsive in addressing community needs.

Description of Institution's Operations in Georgia

The state of Georgia consists of two AAs including a portion of the Atlanta-Sandy Springs-Roswell, GA MSA (Atlanta MSA) and the Augusta-Richmond County, GA-SC MSA (Augusta MSA). Refer to the table in appendix A for a list of counties reviewed.

As of year-end 2024, the bank operated 30 branches and 34 deposit-taking ATMs in this rating area. The bank had $2.7 billion in adjusted deposits in this rating area, which represented 1.6 percent of the bank's total deposits. This rating area was the bank's 10th largest in terms of deposits. During the evaluation period, the bank made $793.4 million or 2.9 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked 11th out of 74 FDIC-insured depository institutions with a 1.4 percent deposit market share in this rating area. The top three competitors had 62.4 percent of the market share and included Truist Bank with 91 branches and 22.8 percent deposit market share, Bank of America, N.A. with 84

branches and 22.4 percent deposit market share, and Wells Fargo Bank, N.A. with 101 branches and 17.2 percent deposit market share.

Atlanta MSA AA

The following tables provide a summary of the demographics, including housing and business information, for the Atlanta MSA AA for each evaluation period.

Assessment Area - FS - 2022-2023 Atlanta MSA						
						2022 - 2023
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	956	9.10	21.23	26.05	38.91	4.71
Population by Geography	3,650,976	7.57	22.71	27.90	38.63	3.20
Housing Units by Geography	1,443,861	8.53	22.43	26.63	38.85	3.55
Owner-Occupied Housing by Geography	793,990	3.69	16.94	29.83	47.75	1.78
Occupied Rental Units by Geography	532,324	14.21	29.95	23.20	26.86	5.77
Vacant Units by Geography	117,547	15.54	25.45	20.58	33.04	5.38
Businesses by Geography	307,527	5.79	21.36	25.16	43.93	3.75
Farms by Geography	5,866	5.37	22.01	31.04	39.57	2.01
Family Distribution by Income Level	833,776	21.39	16.11	18.34	44.16	0.00
Household Distribution by Income Level	1,326,314	23.61	15.74	17.41	43.24	0.00
Unemployment rate (%)	5.29	9.46	6.72	5.10	3.78	6.81
Households Below Poverty Level (%)	10.85	26.00	14.93	9.40	5.71	20.19
Median Family Income (12060 - Atlanta-Sandy Springs-Alpharetta, GA MSA)		$84,791			**Median Housing Value**	$234,400
Median Family Income (12060 - Atlanta-Sandy Springs-Alpharetta, GA MSA) for 2023		$102,900			**Median Gross Rent**	$1,264
					Families Below Poverty Level	8.50
FFIEC File - 2020 Census						
2023 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

Assessment Area - FS - 2024 Atlanta MSA						
						2024
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	956	8.47	20.29	27.62	38.91	4.71
Population by Geography	3,650,976	7.45	21.11	29.57	38.67	3.20
Housing Units by Geography	1,443,861	8.36	20.94	28.45	38.71	3.55
Owner-Occupied Housing by Geography	793,990	3.67	15.42	31.54	47.58	1.78
Occupied Rental Units by Geography	532,324	13.97	28.31	25.23	26.73	5.77
Vacant Units by Geography	117,547	14.61	24.80	22.18	33.03	5.38
Businesses by Geography	302,011	5.98	20.02	27.54	42.98	3.48

Farms by Geography	5,581	5.75	19.71	33.45	39.04	2.04
Family Distribution by Income Level	833,776	21.13	16.03	18.25	44.60	0.00
Household Distribution by Income Level	1,326,314	23.34	15.68	17.47	43.51	0.00
Unemployment rate (%)	5.29	9.47	6.68	5.29	3.72	6.81
Households Below Poverty Level (%)	10.85	25.56	15.34	9.56	5.72	20.19
Median Family Income (12054 - Atlanta-Sandy Springs-Roswell, GA MD)		$81,951			**Median Housing Value**	$234,400
Median Family Income (31924 - Marietta, GA MD)		$91,140			**Median Gross Rent**	$1,264
Median Family Income (12054 - Atlanta-Sandy Springs-Roswell, GA MD) for 2024		$100,900			**Families Below Poverty Level**	8.50
Median Family Income (31924 - Marietta, GA MD) for 2024		$114,000				
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

The Atlanta MSA AA consisted of Cobb, Dekalb, Fulton, Gwinnett, and Walton counties. As of year-end 2024, the bank operated 28 branches and 32 deposit-taking ATMs in this AA.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, the bank ranked 11th out of 68 FDIC-insured depository institutions with a 1.3 percent deposit market share in this AA. The top three competitors had 63.1 percent of the market share and included Truist Bank with 86 branches and 23.4 percent deposit market share, Bank of America, N.A. with 80 branches and 22.8 percent deposit market share, and Wells Fargo Bank, N.A. with 92 branches and 16.9 percent deposit market share.

In the performance context, examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be $1,258. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Based on the 2023 and 2024 median family income, the calculated maximum affordable monthly mortgage payment ranged between $1,261 to $1,425 for a low-income borrower and between $2,018 to $2,280 for a moderate-income borrower, depending on the MD. Based on these calculations, housing was affordable for both low- and moderate-income borrowers. Community contacts (see below) noted affordable housing continues to be a community need despite these calculations.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For this AA, 8.5 percent of families were living below the poverty level.

Economic Data

Data from the November 2024 Moody's Analytics report indicates the Atlanta metro economy has downshifted and is in the mid-expansion part of the business cycle. The stabilized unemployment rate is due to a reduced labor force rather than through hiring. Major employers include Delta Air Lines Inc., Emory University & Emory Healthcare, Piedmont Healthcare, Northside Hospital, and Publix Super Markets. Housing price appreciation has nearly stalled, and residential construction is flat. Area strengths include a diverse economy, distribution and cultural center, a business-friendly environment, and a large talent pool coupled with healthy net migration. Weaknesses include a heavy dependence on transportation which raises cyclical volatility, strained infrastructure, and single-family housing being overvalued.

According to the BLS, the non-seasonally adjusted unemployment rate for the Atlanta MSA was 3.4 percent as of January 2022 and remained relatively stable at 3.3 percent as of December 2024. The national unemployment rate was 3.9 percent as of December 2024.

Community Contacts

Examiners reviewed information from four community contact interviews conducted during the evaluation period. The organizations contacted focused on small business and economic development, affordable housing, job creation, and community services. There are key gaps in support for start-ups, minority-owned businesses, and affordable housing. There is a need for equity capital investments, with a preference for non-diluted products, to help grow local enterprises lacking collateral. One contact stated gentrification is a challenge and people are being pushed out to the suburbs. The contact indicated there are programs in place to assist, but people cannot afford to move. One contact indicated housing prices skyrocketed in recent years with new developments of housing at higher prices. Additionally, increased financial literacy education, particularly for small businesses and consumers, is crucial. These sources identified the following needs and opportunities within the community:

- Improved access to affordable housing
- Homebuyer education and counseling
- Small business and consumer financial literacy workshops to provide information on obtaining and preserving credit
- Donations to support local nonprofit organizations that provide food assistance to low- and moderate-income households and seniors
- Access to capital for start-ups, especially those with limited collateral or without collateral
- Credit programs to assist minority and women-owned businesses
- Non-diluted equity capital investment products (not loans or venture capital) to support business growth

Scope of Evaluation in Georgia

Examiners selected one AA for a full-scope review. Examiners conducted a full-scope review of the Atlanta MSA AA as it is the largest AA in the state of Georgia in terms of deposits, branches, and lending activity. The Augusta MSA AA received a limited-scope review. Refer to the table in appendix A for more information.

Examiners based their ratings primarily on the results of the areas that received the full-scope reviews and the bank's performance in the limited-scope areas, as applicable. The Atlanta MSA AA was most heavily weighted when arriving at the overall conclusion for the state of Georgia.

Examiners placed more emphasis on home mortgage loans than small loans to businesses in arriving at the overall conclusion as they represented the majority of lending for Atlanta MSA AA. The bank originated too few small loans to businesses in the August MSA AA to conduct a meaningful analysis. The bank did not originate or purchase small loans to farms in this rating area.

For the Atlanta MSA AA, FTB's delineated AA did not change during the evaluation period; however, the Atlanta MSA was divided into two MDs in 2024, which resulted in the need for two separate analyses for this AA.

Bank delineated AAs located in the same MSA are combined, analyzed, and presented as one AA for purposes of this evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN GEORGIA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Atlanta MSA AA was excellent.

Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Table 3: Lending Activity								2022 - 2024
Number of Loans								
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Consumer**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Atlanta MSA	2,118	522	0	11	-	2,651	93.35	91.95
Augusta MSA	168	18	0	2	-	188	6.62	8.05
Broader Statewide or Regional Area	0	0	0	1	-	1	0.04	NA
Total	**2,286**	**540**	**0**	**14**	**-**	**2,840**	**100.00**	**100.00**
Dollar Volume of Loans ($000s)								
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Consumer**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Atlanta MSA	641,642	120,775	0	94,686	-	857,103	93.46	91.95
Augusta MSA	25,706	5,323	0	26,900	-	57,929	6.32	8.05
Broader Statewide or Regional Area	0	0	0	2,000	-	2,000	0.22	NA
Total	**667,348**	**126,098**	**0**	**123,586**	**-**	**917,032**	**100.00**	**100.00**
Source: 1/1/2022 - 12/31/2024 Bank Data.								
Due to rounding, totals may not equal 100.0%								

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

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked 11th out of 68 FDIC-insured depository institutions (top 17 percent) with a 1.3 percent deposit market share.

For home mortgage loans, the bank's market share of 0.5 percent ranked 49th out of 787 lenders (top 7 percent). The top three lenders were Rocket Mortgage with 6.1 percent market share, United Wholesale Mortgage with 5.3 percent market share, and Pennymac Loan Services LLC with 4.6 percent market share.

For small loans to businesses, the bank's market share of 0.1 percent ranked 36th out of 213 lenders (top 17 percent). The top three lenders were American Express National Bank with 37.2 percent market share, JPMorgan Chase Bank, N.A. with 17.4 percent market share, and Bank of America, N.A. with 10.9 percent market share. The top small business lenders were institutions with large business credit card portfolios with average loan sizes of $21,000 or less. FTB's average small business loan size was $248,000.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. The geographic distribution of home mortgage loans was good and the geographic distribution of small loans to businesses was good.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans was good.

2022-2023
The geographic distribution of home mortgage loans for the 2022-2023 analysis period was good. The percentage of home mortgage loans originated or purchased in low-income geographies was near to the percentage of owner-occupied housing units located in those geographies but was below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies approximated the percentage of owner-occupied housing units located in those geographies and was near to the aggregate percentage of all reporting lenders.

2024
The geographic distribution of home mortgage loans for the 2024 analysis period was excellent. The percentage of home mortgage loans originated or purchased in low-income geographies exceeded the percentage of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in moderate-income geographies exceeded the percentage of owner-occupied housing units located in those geographies.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was good.

2022-2023
The geographic distribution of small loans to businesses during the 2022-2023 analysis period was good. The percentage of small loans to businesses originated or purchased in low-income geographies was below the percentage of businesses located in those geographies but was near to the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies approximated the percentage of businesses located in those geographies and exceeded the aggregate percentage of all reporting lenders.

2024
The geographic distribution of small loans to businesses during the 2024 analysis period was excellent. The percentage of small loans to businesses originated or purchased in low-income geographies approximated the percentage of businesses located in those geographies. The

percentage of small loans to businesses originated or purchased in moderate-income geographies approximated the percentage of businesses located in those geographies.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AA. Examiners did not identify any unexplained conspicuous gaps in the full-scope AA reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution. The distribution of home mortgage loans was good and the distribution of loans to small businesses was adequate.

Home Mortgage Loans

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

The distribution of home mortgage loans among individuals of different income levels was good.

2022-2023
The distribution of home mortgage loans during the 2022-2023 analysis period was good. The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below the percentage of those families in the AA but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate percentage of all reporting lenders.

2024
The distribution of home mortgage loans during the 2024 analysis period was adequate. The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to moderate-income borrowers was near to the percentage of those families in the AA.

Small Loans to Businesses

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

The distribution of loans to businesses of different sizes was adequate.

2022-2023
The distribution of loans to small businesses during the 2022-2023 analysis period was adequate. The percentage of loans to small businesses originated or purchased was well below the percentage of small businesses in the AA but exceeded the aggregate percentage of all reporting lenders.

2024
The distribution of loans to small businesses during the 2024 analysis period was adequate. The percentage of loans to small businesses originated or purchased was well below the percentage of small businesses in the AA; however, the bank's percentage of lending to small businesses increased from 50 percent during the 2022-2023 analysis period to 58.8 percent in 2024. Since aggregate data was not yet available, consideration was given to this increase in reaching the conclusion.

Community Development Lending

The institution was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.

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

The level of CD lending was excellent. During the evaluation period, FTB originated 11 CD loans totaling $94.7 million or 30.2 percent of allocated tier 1 capital. By dollar volume, 72 percent funded economic development, 26.9 percent funded affordable housing, and 1.1 percent funded community services. CD loans were responsive to identified community needs. The following are examples of CD loans the bank originated or purchased in the AA:

- A $25.5 million construction bridge loan to finance the renovation of a 220-unit, mixed income LIHTC apartment complex. The bank demonstrated multifaceted support through a $10 million equity investment in the same project.

- A $1 million line of credit to an organization that provides services to primarily low- and moderate-income veterans and homeless individuals.

- A $10 million line of credit was established with a Small Business Investment Company providing both debt and equity investments across the lower middle market. Of the $10 million, $833,333 was allocated toward an Atlanta-based asset-driven third-party logistics provider specializing in comprehensive end-to-end supply chain solutions.

Broader Statewide or Regional area

In addition, the bank made one CD loan totaling $2 million in the BSRA whose purpose, mandate, or function did not include serving the bank's AA. The BSRA lending supported the Lending Test rating.

Product Innovation and Flexibility

The institution made limited use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank originated or purchased 230 loans under its flexible lending programs totaling $42.6 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for details regarding the programs offered.

Conclusions for Area Receiving a Limited-Scope Review

Refer to Tables 7 through 10 in the state of Georgia section of appendix D for the facts and data that support the limited-scope conclusions.

Based on a limited-scope review, the bank's performance under the Lending Test in the Augusta MSA AA was consistent with the bank's overall performance under the Lending Test in the full-scope area. Performance in the limited-scope AA supported the overall state rating.

INVESTMENT TEST

The bank's performance under the Investment Test in Georgia is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Atlanta MSA AA was excellent.

Table 4: Qualified Investments*

Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Atlanta MSA	8	27,755	50	35,243	58	86.57	62,998	92.62	2	3,000
Augusta MSA	2	3,012	6	2,009	8	11.94	5,021	7.38	0	0
Broader Statewide or Regional Area	1	2	0	0	1`	1.49	2	0.00	0	0
Total	11	30,769	56	37,252	67	100.00	68,021	100.00	2	3,000

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

The institution had an excellent level of qualified investments, including grants, but not in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current and prior period investments (excluding unfunded commitments) represented 20.1 percent of allocated tier 1 capital.

The institution exhibited good responsiveness to credit and community development needs. The institution did not use innovative and/or complex investments to support CD initiatives. By dollar volume during the current period, 57.6 percent of total investments and grants supported affordable housing, 38.5 percent promoted economic development, 2.4 percent funded

revitalization and stabilization efforts, and 1.5 percent supported community services to low- and moderate-income individuals. The following are examples of qualified investments in the AA:

- The bank made a $10 million investment in a multi-investor LIHTC fund for a 220-unit apartment complex, where 66 units are restricted to Section 8, 44 units are restricted to 50 percent of the area median income, and 44 units are restricted to 60 percent of the area median income. The investment responded to the community-identified need for affordable housing. Further, the bank demonstrated a multifaceted approach by also providing $25.5 million in construction financing.

- The bank made a $2 million non-tax credit investment in a CDFI providing low-interest loans and flexible capital to build or preserve affordable housing.

- The bank made two responsive grants totaling $50,000 to a fund that creates access to affordable housing in a neighborhood that is permanently restricted to residents at 30 to 60 percent of the area median income. The grants also support workforce housing with down payment assistance and financial literacy education.

Broader Statewide or Regional Area

In addition, the bank made one investment during the prior period with a remaining book value of $2,000 in a project or organization in the BSRA whose purpose, mandate, or function included serving the bank's AA. The BSRA investment supported the overall Investment Test rating.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Augusta MSA AA was consistent with the bank's overall performance under the Investment Test in the full-scope area. Performance in the limited-scope AA had minimal impact on the overall state rating.

SERVICE TEST

The bank's performance under the Service Test in Georgia is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

Table 5: Distribution of Branch Delivery Systems														2024
Assessment Area	Deposits	Branches							Population					
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography					
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA	
Atlanta MSA	91.95	28	93.33	0.00	21.43	25.00	46.43	7.14	7.45	21.11	29.57	38.67	3.20	
Augusta MSA	8.05	2	6.67	0.00	50.00	0.00	50.00	0.00	9.19	19.65	35.05	33.21	2.90	
Total	100.00	30	100.00	0.00	23.33	23.33	46.67	6.67	7.61	20.98	30.06	38.18	3.17	
Source: FFIEC File - 2024 Census														
1/1/2022 - 12/31/2024 Bank Data														
Due to rounding, totals may not equal 100.0%														

Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AA. The bank did not have branches in low-income geographies. The bank's distribution of branches in low-income geographies was significantly below, and in moderate-income geographies exceeded, the percentage of the population living within those geographies. Examiners further considered seven middle- or upper-income adjacent branches located within 1,000 feet of low- or moderate-income geographies within the AA. Additionally, the OCC considered two middle- or upper-income branches and one branch from an unknown income category that were in close proximity to low-income geographies and served customers residing in those areas as demonstrated by bank customer usage data. These branches improved accessibility and had a positive impact on the retail Service Test conclusion.

The bank had several ADS including ATMs, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers and were positively considered in the service delivery systems conclusion. The bank had 87 ATMs in the AA, 32 of which were deposit-taking. Per data provided by the bank, as of the end of the evaluation period, bank customers located in low- and moderate-income geographies used online banking at a rate (46.9 percent) less than customers in middle- and upper-income geographies (49.5 percent), while mobile banking usage rates amongst customers in low- and moderate-income geographies (65.4 percent) were higher than that of customers in middle- and upper-income geographies (58.7 percent). During the evaluation period, online banking usage increased 1.5 percent for customers located in low-and moderate-income geographies and 4.4 percent for customers in middle- and upper-income geographies. Mobile banking usage increased 5.4 percent for customers in low- and moderate-income geographies and 7.5 percent for customers in middle- and upper-income geographies.

Table 6: Distribution of Branch Openings/Closings								
Branch Openings/Closings								
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Atlanta MSA	3	5	0	0	-1	-1	0
Augusta MSA	0	0	0	0	0	0	0
Total	3	5	0	0	-1	-1	0
1/1/2022 - 12/31/2024 Bank Data.							

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

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, the bank closed five branches, none of which were in low- or moderate-income geographies. The branch closures were a result of low productivity, a lease expiration, and consolidation of nearby locations. The bank also opened three branches during the evaluation period, none of which were in low- or moderate-income geographies.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced, its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional banking products and services at all branches in the AA. Average hours of operation for branches in moderate-income geographies were comparable to those branches in middle- and upper-income geographies. Branch hours were consistent based on the branch type. There were 21 Standard Banking Center branches in the AA and seven Banking Mart (in-store) branches. Banking Center branches all had the same lobby hours of 9:00 a.m. to 5:00 p.m. Monday through Thursday with extended hours offered on Friday, from 9:00 a.m. to 6:00 p.m. at 19 branches including all four moderate-income branches. There were 19 Banking Center branches open from 9:00 a.m. to 12:00 p.m. on Saturdays, including all four moderate-income branches. The Banking Mart branches all had the same lobby hours of 10:00 a.m. to 7:00 p.m. Monday through Friday and 10:00 a.m. to 5:00 p.m. on Saturdays. Of the seven Banking Mart branches, two were in moderate-income geographies. There were 19 Banking Center locations with drive-thru facilities, including all four moderate-income branches. None of the Bank Mark branches had drive-thru facilities.

Community Development Services

The institution provided a relatively high level of CD services. During the evaluation period, bank employees provided 764 hours of qualified CD service activities to 27 organizations within this AA. Leadership is evident through board or committee participation, with six employees providing 84 service hours. Additionally, the bank hosted nine eBus events in the Atlanta MSA benefiting 580 individuals. The bank's assistance was responsive to identified needs in the AA, particularly with financial education. Service activity examples during the evaluation period include:

- Bank employees provided 16 hours of financial education during an eBus event in coordination with an area organization that provides supportive services to promote self-sufficiency including job training for underemployed and unemployed individuals.

- Bank employees, in collaboration with an area Community Development Corporation, provided financial education to low- and moderate-income students through a financial literacy bootcamp.

- A senior vice president at the bank provided 12 service hours on the board of the local chapter of a nationwide affordable housing advocacy organization.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's retail service delivery systems performance under the Service Test in the Augusta MSA AA was consistent with the bank's overall retail service delivery systems performance in the full-scope area.

State of Illinois

CRA rating for the State of Illinois: Outstanding
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflected good responsiveness to AA credit needs.
- The bank exhibited an excellent geographic distribution of loans in its AA.
- The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank had an excellent level of qualified CD investments and grants which were responsive in addressing community needs.
- Service delivery systems were overall readily accessible to geographies and individuals of different income levels in the institution's AAs with consideration for middle- and upper-income adjacent branches and ADS.
- The bank provided an adequate level of CD services.

Description of Institution's Operations in Illinois

The state of Illinois consists of three AAs including portions of the Carbondale-Marion, IL MSA (Carbondale MSA) and the Rockford, IL MSA (Rockford MSA) and five nonmetropolitan counties comprising the Illinois non-MSA (IL non-MSA) AA. Examiners combined the nonmetropolitan counties into one AA for analysis and presentation. Refer to the table in appendix A for a list of counties reviewed.

As of year-end 2024, the bank operated seven branches and eight deposit-taking ATMs in this rating area. The bank had $508.8 million in deposits in this rating area, which represented 0.3 percent of the bank's total adjusted deposits. This rating area was the bank's 14th largest in terms of deposits held. During the evaluation period, the bank made $54 million or 0.2 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB had $508.8 million in deposits. The bank ranked 10th out of 56 FDIC-insured depository institutions with a 3.1 percent deposit market share in this rating area. The top three competitors had 28.3 percent of the market share and included Midland States Bank with 13 branches and 12.9 percent deposit market share, HTLF Bank with five branches and 9.6 percent deposit market share, and JPMorgan Chase Bank, N.A. with five branches and 5.8 percent deposit market share.

IL non-MSA AA

The following tables provide a summary of the demographics, including housing and business information, for the IL non-MSA AA for each evaluation period.

Assessment Area - FS - 2022-2023 IL non-MSA						
						2022 - 2023
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	51	3.92	21.57	52.94	21.57	0.00
Population by Geography	172,102	2.68	18.77	54.03	24.53	0.00
Housing Units by Geography	79,693	3.41	20.33	52.79	23.47	0.00
Owner-Occupied Housing by Geography	52,302	2.00	15.37	56.37	26.25	0.00
Occupied Rental Units by Geography	19,312	6.54	32.01	44.57	16.89	0.00
Vacant Units by Geography	8,079	5.07	24.51	49.21	21.20	0.00
Businesses by Geography	5,329	5.10	20.06	51.02	23.81	0.00
Farms by Geography	622	0.96	3.86	68.97	26.21	0.00
Family Distribution by Income Level	46,575	19.82	18.40	22.04	39.74	0.00
Household Distribution by Income Level	71,614	23.23	16.08	18.64	42.05	0.00
Unemployment rate (%)	4.78	13.67	7.16	4.31	2.92	0.00
Households Below Poverty Level (%)	12.34	34.53	16.42	11.40	8.02	0.00
Median Family Income (Non-MSAs - IL)		$68,958			**Median Housing Value**	$114,400
Median Family Income (Non-MSAs - IL) for 2023		$82,300			**Median Gross Rent**	$694
					Families Below Poverty Level	9.30
FFIEC File - 2020 Census						
2023 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

Assessment Area - FS - 2024 IL non-MSA						
						2024
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	69	2.90	20.29	53.62	21.74	1.45
Population by Geography	239,255	1.93	18.35	56.27	22.37	1.08
Housing Units by Geography	111,128	2.45	19.91	55.17	21.25	1.22
Owner-Occupied Housing by Geography	72,014	1.45	15.51	58.41	23.93	0.70
Occupied Rental Units by Geography	27,537	4.59	29.60	48.09	15.02	2.70
Vacant Units by Geography	11,577	3.54	24.24	51.86	19.42	0.94
Businesses by Geography	7,254	3.54	17.95	52.36	23.70	2.45
Farms by Geography	715	0.84	5.59	64.34	28.39	0.84
Family Distribution by Income Level	64,009	19.88	18.07	21.12	40.93	0.00

Household Distribution by Income Level	99,551	23.36	15.69	18.33	42.62	0.00
Unemployment rate (%)	4.90	13.67	7.27	4.66	2.82	4.23
Households Below Poverty Level (%)	13.09	34.53	17.83	12.22	8.07	24.46
Median Family Income (Non-MSAs - IL)		$67,835	**Median Housing Value**			$114,400
Median Family Income (Non-MSAs - IL) for 2024		$82,800	**Median Gross Rent**			$711
			Families Below Poverty Level			9.61
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

The IL non-MSA AA consisted of Effingham, Jefferson, Stephenson, and Whiteside for 2022-2023 and Effingham, Jefferson, Stephenson, Whiteside, and Williamson for 2024. As of year-end 2024, the bank operated five branches and five deposit-taking ATMs in this AA.

Based on the June 30, 2023, FDIC Summary of Deposit Market Share Report, the bank ranked sixth out of 37 FDIC-insured depository institutions with a 4.5 percent deposit market share in this AA. The top three competitors had 31.6 percent of the market share and included Midland States Bank with five branches and 19.1 percent deposit market share, Dieterich Bank with five branches and 6.8 percent deposit market share, and Sauk Valley Bank & Trust Company with five branches and 5.7 percent deposit market share.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, the bank ranked sixth out of 44 FDIC-insured depository institutions with a 4.5 percent deposit market share in this AA. The top three competitors had 27.4 percent of the market share and included Midland States Bank with five branches and 13.9 percent deposit market share, Dieterich Bank with five branches and 7.1 percent deposit market share, and Banterra Bank with 10 branches and 6.4 percent deposit market share.

In the performance context, examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be $614. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Based on the 2023 and 2024 median family income, respectively, the calculated maximum affordable monthly mortgage payment ranged between $1,029 to $1,035 for a low-income borrower and between $1,646 to $1,656 for a moderate-income borrower, depending on the MD. Based on these calculations, housing was affordable for both low- and moderate-income borrowers. Community contacts (see below) noted affordable housing continues to be a community need despite these calculations.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan

than those with income above the poverty level. For this AA, 9.6 percent of families were living below the poverty level.

Economic Data

Data from the October 2024 Moody's Analytics report indicates the Illinois economy has accelerated and is in the recovery part of the business cycle. Payroll growth in on par with the national pace, largely due to state and local government jobs. The primary job creator is healthcare. Financial, professional, and businesses services have stagnated. The transportation and warehousing sector remain strong, supported by Illinois' role as a major air and rail hub. Single-family home price appreciation mirrors the national trend. Area strengths include a major business, financial, distribution and transportation center in Chicago as well as high per capita income. Weaknesses include state and local fiscal pressures, weak demographic trends, globally oriented manufacturing and service industries, and few growth drivers in the southern part of the state.

According to the BLS, the non-seasonally adjusted average unemployment rate for the counties that comprise the AA ranged from 3.1 (Effingham County) to 4.8 percent (Jefferson County) in 2022 and 3.6 percent (Effingham County) to 4.9 percent (Stephenson County) in 2024. The state of Illinois average unemployment rate in 2022 was 4.6 percent and increased to 5.0 percent in 2024.

Community Contacts

Examiners reviewed information from four community contact interviews conducted during the evaluation period. The organizations contacted focused on affordable housing, small business and economic development, workforce development, and a farm services agency. One of the organizations is a nonprofit CDFI. These sources identified the following needs and opportunities within the community:

- Affordable housing units, including rental units
- Flexible loans for start-ups and small businesses
- Financial management education for entrepreneurs and small businesses
- Low-interest business loans to entrepreneurs with limited credit history and low credit scores

Scope of Evaluation in Illinois

Examiners selected one AA for a full-scope review. Examiners conducted a full-scope review of the IL non-MSA AA as it is the largest AA in the state of Illinois in terms of deposits, branches, and lending activity. The Carbondale MSA and Rockford MSA AAs received limited-scope reviews. Refer to the table in appendix A for more information.

Examiners based their ratings primarily on the results of the areas that received the full-scope reviews and the bank's performance in the limited-scope areas, as applicable. The IL non-MSA AA was the most heavily weighted when arriving at the overall conclusion for the state of Illinois.

Examiners placed more emphasis on home mortgage loans than small loans to businesses in arriving at the overall conclusion for all AAs in the rating area as they represented the majority of lending in all AAs. The bank originated or purchased too few small loans to farms in all AAs in this rating area to conduct a meaningful analysis.

During the evaluation period, MSA boundary changes introduced in July 2023, effective January 1, 2024, by the United States OMB, resulted in the removal of the Carbondale-Marion, IL MSA and the reclassification of Williamson County to a non-MSA county. For 2022-2023, Williamson County is included in the Carbondale MSA AA. For 2024, Williamson County is included in the IL non-MSA AA. The reclassification of Williamson County resulted in the elimination of the Carbondale MSA for 2024; therefore, tables reporting the percent of deposits for each AA will reflect "NA", not applicable, for this AA.

Bank delineated AAs located in the same MSA are combined, analyzed, and presented as one AA for purposes of this evaluation. Similarly, bank delineated non-MSA AAs within the same state are combined, analyzed, and presented as one AA for purposes of this evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on full-scope reviews, the bank's performance in the IL non-MSA AA was excellent.

Lending Activity

Lending levels reflected good responsiveness to the credit needs of the AAs.

Table 3: Lending Activity **2022 - 2024**

Number of Loans

Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
IL non-MSA	286	50	8	1	-	345	60.74	78.61
Carbondale MSA	53	4	0	0	-	57	10.04	NA
Rockford MSA	128	36	0	1	-	165	29.05	21.39
Broader Statewide or Regional Area	0	0	0	1	-	1	0.18	NA
Total	**467**	**90**	**8**	**3**	**-**	**568**	**100.00**	**100.00**

Dollar Volume of Loans ($000s)								
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Consumer**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
IL non-MSA	23,670	4,229	945	15	-	28,859	38.75	78.61
Carbondale MSA	4,422	111	0	0	-	4,533	6.09	NA
Rockford MSA	14,130	6,456	0	17,000	-	37,586	50.47	21.39
Broader Statewide or Regional Area	0	0	0	3,500	-	3,500	4.70	NA
Total	**42,222**	**10,796**	**945**	**20,515**	**-**	**74,478**	**100.00**	**100.00**
Source: 1/1/2022 - 12/31/2024 Bank Data.								
Due to rounding, totals may not equal 100.0%								

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

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked sixth out of 44 FDIC-insured depository institutions (top 14 percent) with a 4.5 percent deposit market share.

For home mortgage loans, the bank's market share of 1.8 percent ranked 16th out of 263 lenders (top 7 percent). The top three lenders were US Bank, N.A. with 10.6 percent market share, Pennymac Loan Services LLC with 3.8 percent market share, and Rocket Mortgage with 3.7 percent market share.

For small loans to businesses, the bank's market share of 0.4 percent ranked 28th out of 75 lenders (top 38 percent). The top three lenders were JPMorgan Chase Bank, N.A. with 17.5 percent market share, American Express National Bank with 15.6 percent market share, and US Bank, N.A. with 14.4 percent market share. The top small business lenders were institutions with large business credit card portfolios with average loan sizes of $13,000 or less. FTB's average small business loan size was $119,000.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA. The distribution of both home mortgage and small loans to businesses was excellent.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans was excellent.

2022-2023
The geographic distribution of home mortgage loans during the 2022-2023 analysis period was excellent. The percentage of home mortgage loans originated or purchased in low-income geographies exceeded both the percentage of owner-occupied housing units located in those

geographies and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies exceeded both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

2024
The geographic distribution of home mortgage loans during the 2024 analysis period was good. The percentage of home mortgage loans originated or purchased in low-income geographies exceeded the percentage of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in moderate-income geographies was below the percentage of owner-occupied housing units located in those geographies.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was excellent.

2022-2023
The geographic distribution of loans to small businesses during the 2022-2023 analysis period was excellent. The percentage of small loans to businesses originated or purchased in low-income geographies was below the percentage of businesses located in those geographies but exceeded the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

2024
The geographic distribution of loans to small businesses during the 2024 analysis period was excellent. The percentage of small loans to businesses originated or purchased in low-income geographies exceeded the percentage of businesses located in those geographies. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded the percentage of businesses located in those geographies.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AA. Examiners did not identify any unexplained conspicuous gaps in the full-scope AA reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution. The

distribution of home mortgage loans was excellent and the distribution of loans to businesses of different sizes was good.

Home Mortgage Loans

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

The distribution of home mortgage loans among individuals of different income levels was excellent.

2022-2023
The distribution of home mortgage loans during the 2022-2023 analysis period was excellent. The percentage of home mortgage loans originated or purchased to low-income borrowers approximated the percentage of those families in the AA and exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate percentage of all reporting lenders.

2024
The distribution of home mortgage loans during the 2024 analysis period was excellent. The percentage of home mortgage loans originated or purchased to low-income borrowers was near to the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded the percentage of those families in the AA.

Small Loans to Businesses

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

The distribution of loans to businesses of different sizes was good.

2022-2023
The distribution of loans to small businesses during the 2022-2023 analysis period was excellent. The percentage of loans to small businesses originated or purchased exceeded both the percentage of small businesses in the AA and the aggregate percentage of all reporting lenders.

2024
The distribution of loans to small businesses during the 2024 analysis period was adequate. The percentage of loans to small businesses originated or purchased was below the percentage of small businesses in the AA.

Community Development Lending

The institution made a low level of CD loans. CD lending had a neutral impact on the Lending Test conclusion.

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

The level of CD lending was poor. FTB originated one CD loan totaling $15,000 or 0.03 percent of allocated tier 1 capital. By dollar volume, 100 percent funded community services. The bank provided a $15,000 working capital line of credit to a nonprofit organization that provides intervention, prevention, education, and advocacy for the best interest of abused children. The CD loan was not responsive to identified community needs.

Broader Statewide or Regional area

In addition, the bank made one CD loan totaling $3.5 million in the BSRA whose purpose, mandate, or function did not include serving the bank's AA. The BSRA lending supported the Lending Test rating.

Product Innovation and Flexibility

The institution made limited use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank originated or purchased 31 loans under its flexible lending programs totaling $2.5 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for details regarding the programs offered.

Conclusions for Areas Receiving Limited-Scope Reviews

Refer to Tables 7 through 10 in the state of Illinois section of appendix D for the facts and data that support the limited-scope conclusions.

Based on a limited-scope review, the bank's performance under the Lending Test in the Rockford MSA AA was consistent with the bank's overall performance under the Lending Test in the full-scope area. The bank's performance in the Carbondale MSA AA was weaker than the bank's overall performance under the Lending Test in the full-scope area. The weaker performance was due to a weaker geographic distribution of loans. Performance in the limited-scope AAs had a minimal impact on the overall state rating.

INVESTMENT TEST

The bank's performance under the Investment Test in Illinois is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the IL non-MSA AA was excellent.

Table 4: Qualified Investments*										
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
IL non-MSA	2	65	8	6,677	10	52.63	6,742	71.75	0	0
Carbondale MSA	0	0	0	0	0	0.00	0	0.00	0	0
Rockford MSA	2	13	3	7	5	26.32	20	0.21	0	0
Broader Statewide or Regional Area	4	2,634	0	0	4	21.05	2,634	28.03	0	0
Total	8	2,712	11	6,684	19	100.00	9,396	100.00	0	0

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

The institution had an excellent level of qualified investments, including grants, but not in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current and prior period investments represented 13.2 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community development needs. Investments were particularly responsive to affordable housing needs. The institution did not use innovative and/or complex investments to support CD initiatives. By dollar volume during the current period, 99.7 percent of total investments and grants supported affordable housing, 0.2 percent supported community services to low- and moderate-income individuals, and 0.1 percent promoted economic development. The following are examples of qualified investments in the non-MSA AA:

- The bank made one $6.7 million investment in a multi-investor fund to support the renovation of 101 units. The investment responded to the community-identified need for affordable housing.

- There were two responsive investments made by the bank prior to 2022 which had a remaining book value of $65,247. Both were for affordable housing LIHTC investments.

Broader Statewide or Regional Area

In addition, the bank made four investments during the prior period with a remaining book value of $2.6 million in projects or organizations in the BSRA whose purpose, mandate, or function included serving the bank's AA. The BSRA area investments supported the overall Investment Test rating.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Carbondale MSA AA and Rockford MSA AA was weaker than the bank's overall performance

under the Investment Test in the full-scope area due to a lower level of investment. Performance in the limited-scope AAs had minimal impact on the overall state rating.

SERVICE TEST

The bank's performance under the Service Test in Illinois is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the IL non-MSA AA was excellent.

Retail Banking Services

Table 5: Distribution of Branch Delivery Systems													2024
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
IL non-MSA	78.61	5	71.43	0.00	20.00	60.00	20.00	0.00	1.93	18.35	56.27	22.37	1.08
Rockford MSA	21.39	2	28.57	0.00	50.00	0.00	50.00	0.00	6.80	27.50	34.08	30.27	1.35
Total	100.00	7	100.00	0.00	28.57	42.86	28.57	0.00	4.57	23.33	44.20	26.66	1.23
Source: FFIEC File - 2024 Census *1/1/2022 - 12/31/2024 Bank Data* *Due to rounding, totals may not equal 100.0%*													

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

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. The bank had no branches in low-income geographies; however, there is less than 2 percent of the population residing within the two low-income geographies in the AA. The bank's distribution of branches in low-income geographies was significantly below, and in moderate-income geographies exceeded, the percentage of the population living within those geographies. Examiners further considered one middle-income adjacent branch that was within 1,000 feet of a moderate-income geography within the AA, which improved access and had a positive impact on the retail Service Test conclusion.

The bank had several ADS including ATMs, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers and were positively considered in the service delivery systems conclusion. The bank had five ATMs in the AA, all of which were deposit-taking. Per data provided by the bank, as of the end of the evaluation period, bank customers located in low- and moderate-income geographies used online banking at a rate (42.1 percent) less than customers in middle- and upper-income geographies (44.9 percent), while mobile banking usage rates amongst customers in low- and moderate-income geographies (52.6 percent) were slightly higher than that of customers in middle- and upper-income geographies (51.2 percent). During the evaluation period, online banking usage increased 20 percent for customers located in low- and moderate-income geographies and 9.5 percent for customers in middle- and upper-income geographies. Mobile banking usage increased 5.3 percent for customers in low- and moderate-income geographies and 12.8 percent for customers in middle- and upper-income geographies.

Table 6: Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
IL non-MSA	0	0	0	0	0	0	0
Rockford MSA	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0
1/1/2022 - 12/31/2024 Bank Data.							

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

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced, its AA, particularly low- and moderate-income geographies and/or individuals. Average hours of operation for the one branch in a moderate-income geography were comparable to the branches in middle- and upper-income geographies. The bank maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. The branches had the same lobby hours of either 9:00 a.m. to 5:00 p.m. or 9:00 a.m. to 5:30 p.m. Monday through Thursday, and 9:00 a.m. to 6:00 p.m. on Friday. All branches were opened on Saturday, with three open from 9:00 a.m. to 12:00 p.m. and two, including the one moderate-income branch, open from 9:00 a.m. to 2:00 p.m. All branch locations had drive-thru facilities.

Community Development Services

The institution provided an adequate level of CD services. During the evaluation period, bank employees provided 72 hours of qualified CD service activities to two organizations within this AA. Leadership is evident through board or committee participation, with one employee providing 65 service hours. Additionally, the bank hosted one eBus event in the AA benefiting 13 individuals. Service activity examples during the evaluation period include:

- A bank employee provided 65 service hours on the board of an organization promoting economic development in the AA.

- The bank hosted an eBus event in coordination with a local housing authority in 2024 that benefited 13 individuals.

Conclusions for Area Receiving a Limited-Scope Reviews

Based on a limited-scope review, the bank's retail service delivery systems performance under the Service Test in the Rockford MSA AA was consistent with the bank's overall retail service delivery systems performance under the Service Test in the full-scope area.

State of Indiana

CRA rating for the State of Indiana: Outstanding
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AA.
- The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank was a leader in making CD loans, which further supported the Lending Test rating.
- The bank had an excellent level of qualified CD investments and grants which were responsive in addressing community needs.
- Service delivery systems were overall readily accessible to geographies and individuals of different income levels in the institution's AAs.
- The bank provided a limited level of CD services. CD services were responsive in addressing community needs.

Description of Institution's Operations in Indiana

The state of Indiana consists of 10 AAs including the entirety of the Columbus, IN MSA (Columbus MSA), the Elkhart-Goshen, IN MSA (Elkhart MSA), the Evansville, IN MSA (Evansville MSA), and the Michigan City-La Porte, IN MSA (Michigan City MSA), portions of the Bloomington, IN MSA (Bloomington MSA), the Fort Wayne, IN MSA (Fort Wayne MSA), the Indianapolis-Carmel-Greenwood, IN MSA (Indianapolis MSA), the Lafayette-West Lafayette, IN MSA (Lafayette MSA), and the Terre Haute, IN MSA (Terre Haute MSA), and 11 nonmetropolitan counties comprising the Indiana non-MSA (IN non-MSA) AA. Examiners combined the nonmetropolitan counties into one AA for analysis and presentation. Refer to the table in appendix A for a list of counties reviewed.

As of year-end 2024, the bank operated 76 branches and 98 deposit-taking ATMs in this rating area. The bank had $11.6 billion in adjusted deposits in this rating area, which represented 7.1 percent of the bank's total adjusted deposits. This rating area was the bank's sixth largest in terms of deposits held. During the evaluation period, the bank made $1.7 billion or 6.2 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked fourth out of 92 FDIC-insured depository institutions with an 8.7 percent deposit market share in this rating area. The top three competitors had 34.4 percent of the market share and included JPMorgan Chase Bank, N.A. with 78 branches and 14.4 percent deposit market share, Merchants Bank of Indiana with three branches and 10.3 percent deposit market share, and PNC Bank, N.A. with 50 branches and 9.7 percent deposit market share.

Indianapolis MSA AA

The following table provides a summary of the demographics, including housing and business information, for the Indianapolis MSA AA.

Assessment Area - FS - Indianapolis MSA						
						2022 - 2024
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	416	12.02	23.32	36.06	26.68	1.92
Population by Geography	1,873,373	8.14	20.09	37.83	32.57	1.37
Housing Units by Geography	766,110	9.51	21.37	37.85	29.81	1.46
Owner-Occupied Housing by Geography	453,114	4.58	14.90	41.33	38.21	0.97
Occupied Rental Units by Geography	246,187	15.58	31.05	33.03	18.16	2.18
Vacant Units by Geography	66,809	20.60	29.56	31.99	15.75	2.10
Businesses by Geography	87,835	7.35	18.49	36.46	34.52	3.18
Farms by Geography	3,095	5.65	15.77	45.62	31.73	1.23
Family Distribution by Income Level	442,778	20.10	17.69	20.63	41.58	0.00
Household Distribution by Income Level	699,301	22.99	16.42	18.50	42.09	0.00
Unemployment rate (%)	4.57	9.61	6.66	3.94	2.82	9.51
Households Below Poverty Level (%)	11.07	29.42	17.53	8.32	4.73	21.66
Median Family Income (26900 - Indianapolis-Carmel-Greenwood, IN MSA)		$80,333	**Median Housing Value**			$155,650
Median Family Income (26900 - Indianapolis-Carmel-Greenwood, IN MSA) for 2024		$98,600	**Median Gross Rent**			$932
			Families Below Poverty Level			7.76
FFIEC File - 2020 Census						
FFIEC File - 2024 Census 2024 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

The Indianapolis MSA AA consisted of Brown, Hamilton, Hancock, Hendricks, Johnson, Marion, Morgan, and Shelby counties. As of year-end 2024, the bank operated 38 branches and 46 deposit-taking ATMs in this AA.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, the bank ranked fourth out of 44 FDIC-insured depository institutions with an 8.4 percent deposit market share in this AA. The top three competitors had 46.4 percent of the market share and included JPMorgan Chase Bank, N.A. with 54 branches and 16.5 percent deposit market share, Merchants Bank of Indiana with three branches and 16.1 percent deposit market share, and PNC Bank, N.A. with 38 branches and 13.8 percent deposit market share.

In the performance context, examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be $836. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Based on the 2024 median family income, the calculated maximum affordable monthly mortgage payment was $1,233 for a low-income borrower and $1,972 for a moderate-income borrower. Based on these calculations, housing was affordable for both low- and moderate-income borrowers. Community contacts (see below) noted affordable housing continues to be a community need despite these calculations.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For this AA, 7.8 percent of families were living below the poverty level.

Economic Data

Data from the October 2024 Moody's Analytics report indicates the Indianapolis metro is thriving and in the mid-expansion part of the business cycle. The metro's 2024 nonfarm payroll growth saw the fastest year-over-year growth among the top 50 most populous metro areas, driven by key sectors such as transportation/warehousing, state government, and leisure/hospitality. In 2023, Walmart opened its largest fulfillment center to date. Indianapolis is also a medical hub, with several major players like Eli Lilly, Roche Diagnostics, and Merck driving growth. Major employers include Indiana University Health, St. Vincent Hospitals & Health Services, Community Health Network, Eli Lilly and Co., and Walmart Inc. Housing prices appreciated at the end of 2024 after experiencing brief contraction at the beginning of the year. The metro area has a younger-than-average population. Area strengths include a diversified industrial structure and well-developed distribution network, an in-demand and growing pharmaceutical industry, a high birth rate and strong migration, and low business and living costs. Weaknesses include above average employment volatility, and a relatively low quality of life compared to other large metro areas.

According to the BLS, the non-seasonally adjusted unemployment rate for the Indianapolis MSA was 3.2 percent as of January 2022 and increased to 3.7 percent as of December 2024. The national unemployment rate was 3.9 percent as of December 2024.

Community Contacts

Examiners reviewed information from two community contact interviews conducted during the evaluation period. The contacts represented organizations focused on affordable housing and small business and economic development. One contact indicated there is a severe shortage of affordable housing with limited inventory and rising prices, and corporate buyers are driving up housing costs, making it difficult for families to compete. Community leaders emphasized the following persistent and growing needs:

- Affordable housing, both owner-occupied and rental housing
- Small business loans
- Access to capital for start-ups and small businesses
- Financial education and technical advisors to support entrepreneurs and business development centers
- Establishing or expanding community-based lending and loan funds
- Matching funds through the State Small Business Credit Initiative

Scope of Evaluation in Indiana

Examiners selected one AA for a full-scope review. Examiners conducted a full-scope review of the Indianapolis MSA AA as it is the largest AA in the state of Indiana in terms of deposits, branches, and lending activity. The Bloomington MSA, Columbus MSA, Elkhart MSA, Evansville MSA, Fort Wayne MSA, Lafayette MSA, Michigan City MSA, Terre Haute MSA, and IN non-MSA AAs received limited-scope reviews. Refer to the table in appendix A for more information.

Examiners based their ratings primarily on the results of the areas that received the full-scope reviews and the bank's performance in the limited-scope areas, as applicable. The Indianapolis MSA AA was the most heavily weighted when arriving at the overall conclusion for the state of Indiana.

Examiners placed more emphasis on home mortgage loans than small loans to businesses in arriving at the overall conclusion for all AAs in the rating area as they represented the majority of lending in all AAs. The bank originated or purchased too few small loans to farms in all AAs in this rating area to conduct a meaningful analysis.

During the evaluation period, MSA boundary changes introduced in July 2023, effective January 1, 2024, by the United States OMB, resulted in the removal of the Parke County from the Terre Haute, IN MSA and the reclassification of Parke County to a non-MSA county. For 2022-2023, Parke County is included in the Terre Haute MSA AA and for 2024, Parke County is included in the IN non-MSA AA. Additionally, the OMB boundary changes impacted the Evansville, IN-KY MMSA. In 2024, Henderson County, Kentucky was reclassified as a non-MSA county in Kentucky, and the three counties the bank delineated in Indiana portion of the MMSA became the Evansville MSA AA.

An analysis of the Evansville MSA AA was performed only for 2024. Prior to this, FTB operated in two states, and the analysis was included under the MMSA. Investments made prior to the

current evaluation that were still outstanding were included in the Evansville MSA AA tables and analysis.

On December 18, 2024, FTB opened a branch in Boone County, which is located within the Indianapolis MSA AA. Boone County will not be included in this evaluation because the bank entered this county less than six months before the end of the evaluation period and the analysis would not be meaningful.

Bank delineated AAs located in the same MSA are combined, analyzed, and presented as one AA for purposes of this evaluation. Similarly, bank delineated non-MSA AAs within the same state are combined, analyzed, and presented as one AA for purposes of this evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN INDIANA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Reviews

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

Lending Activity

Lending levels reflected excellent responsiveness to the credit needs of the AA.

Table 3: Lending Activity **2022 - 2024**

Number of Loans

Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Indianapolis MSA	5,143	939	8	38	-	6,128	53.60	60.80
Bloomington MSA	250	44	0	2	-	296	2.59	2.61
Columbus MSA	249	14	0	0	-	263	2.30	0.87
Elkhart MSA	134	27	0	5	-	166	1.45	1.51
Evansville MSA	271	92	1	1	-	365	3.19	15.26
Fort Wayne MSA	1,136	106	0	4	-	1,246	10.90	3.93
Lafayette MSA	181	20	0	2	-	203	1.78	1.42
Michigan City MSA	449	45	2	0	-	496	4.34	1.79
Terre Haute MSA	641	49	3	2	-	695	6.08	2.71
IN non-MSA	1,387	169	4	5	-	1,565	13.69	9.10
Broader Statewide or Regional Area	0	0	0	9	-	9	0.08	NA
Total	**9,841**	**1,505**	**18**	**68**	**-**	**11,432**	**100.00**	**100.00**

Dollar Volume of Loans ($000s)

Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Indianapolis MSA	896,963	133,452	348	177,532	-	1,208,295	62.85	60.80
Bloomington MSA	35,828	5,428	0	8,333	-	49,589	2.58	2.61
Columbus MSA	33,518	1,667	0	0	-	35,185	1.83	0.87
Elkhart MSA	18,090	6,492	0	21,853	-	46,435	2.42	1.51
Evansville MSA	31,052	7,176	110	1,000	-	39,338	2.05	15.26
Fort Wayne MSA	179,188	15,054	0	12,276	-	206,518	10.74	3.93
Lafayette MSA	24,541	1,419	0	8,333	-	34,293	1.78	1.42
Michigan City MSA	51,632	3,398	200	0	-	55,230	2.87	1.79
Terre Haute MSA	51,588	2,790	53	1,853	-	56,284	2.93	2.71
IN non-MSA	148,987	16,518	130	6,353	-	171,988	8.95	9.10
Broader Statewide or Regional Area	0	0	0	19,308	-	19,308	1.00	NA
Total	**1,471,387**	**193,394**	**841**	**256,841**	**-**	**1,922,463**	**100.00**	**100.00**

Source: 1/1/2022 - 12/31/2024 Bank Data.

Due to rounding, totals may not equal 100.0%

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

**Lending activity represented in this table includes only 2024 data for the Evansville MSA AA.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked fourth out of 44 FDIC-insured depository institutions (top 10 percent) with an 8.4 percent deposit market share.

For home mortgage loans, the bank's market share of 2.4 percent ranked 10th out of 631 lenders (top 2 percent). The top three lenders were Rocket Mortgage with 4 percent market share, Huntington National Bank with 3.8 percent market share, and Newrez LLC with 3.3 percent market share.

For small loans to businesses, the bank's market share of 0.7 percent ranked 19th out of 153 lenders (top 13 percent). The top three lenders were JPMorgan Chase Bank, N.A. with 26.5 percent market share, American Express National Bank with 22.6 percent market share, and Capital One, N.A. with 7.7 percent market share. The top small business lenders were institutions with large business credit card portfolios with average loan sizes of $14,000 or less. FTB's average small business loan size was $148,000.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. The distribution of home mortgage loans was good and the distribution of small loans to businesses was excellent.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans was good. The percentage of home mortgage loans originated or purchased in low-income geographies was below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies exceeded the percentage of owner-occupied housing units located in those geographies and approximated the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was excellent. The percentage of small loans to businesses originated or purchased in low-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AA. Examiners did not identify any unexplained conspicuous gaps in the full-scope AA reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution. The distribution of home mortgage loans was excellent and the distribution of loans to businesses of different sizes was good.

Home Mortgage Loans

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

The distribution of home mortgage loans among individuals of different income levels was excellent. The percentage of home mortgage loans originated or purchased to low-income borrowers was near to the percentage of those families in the AA but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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

The distribution of loans to businesses of different sizes was good. The percentage of loans to small businesses originated or purchased was below the percentage of small businesses in the AA but exceeded the aggregate percentage of all reporting lenders.

Community Development Lending

The institution was a leader in making CD loans, which further supported the Lending Test conclusion.

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

The level of CD lending was excellent. During the evaluation period, FTB originated 38 CD loans totaling $177.5 million or 19.7 percent of allocated tier 1 capital. By dollar volume, 60.4 percent funded economic development, 31.3 percent funded affordable housing, and 8.3 percent funded community services. CD loans were responsive to identified community needs including

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

- An $8.6 million loan to finance the construction of a 43-unit LIHTC project. The project consists of seven residential building units that will provide integrated permanent supportive housing to families experiencing homelessness. The units are restricted to tenants earning less than 80 percent of the area median income.

- An $8.5 million loan to finance the construction of a 55-unit LIHTC permanent supportive housing project in Indianapolis. The project includes a two-story building with an elevator and targets the homeless or those at-risk for homelessness. All units are subsidized through a project-based Section 8 contract, which results in residents paying just 30 percent of their income toward rent. The bank demonstrated multifaceted support through a $12 million equity investment in the same property.

A $150,000 line of credit to a nonprofit organization to support the mission of connecting low- and moderate-income kids to college students through mentoring and weekly on-campus activities. Broader Statewide or Regional area

In addition, the bank made nine CD loans totaling $19.3 million in the BSRA whose purpose, mandate, or function did not include serving the bank's AA. The BSRA lending supported the Lending Test rating.

Product Innovation and Flexibility

The institution used innovative and/or flexible lending practices in order to serve AA credit needs. The bank originated or purchased 755 loans under its flexible lending programs totaling $133.7 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for details regarding the programs offered.

Conclusions for Areas Receiving Limited-Scope Reviews

Refer to Tables 7 through 10 in the state of Indiana section of appendix D for the facts and data that support the limited-scope conclusions.

Based on limited-scope reviews, the bank's performance under the Lending Test in the Bloomington MSA AA, Columbus MSA AA, Elkhart MSA AA, Fort Wayne MSA AA, Lafayette MSA AA, Michigan City MSA AA, and the IN non-MSA AA was consistent with the bank's overall performance under the Lending Test in the full-scope area. The bank's performance under the Lending Test in the Evansville MSA AA and the Terre Haute MSA AA was weaker than the bank's overall performance under the Lending Test in the full-scope area. The weaker performance in the Evansville MSA AA was due to a low level of CD lending. The weaker performance in the Terre Haute MSA AA was due to a weaker geographic and borrower distribution. Performance in the limited-scope AAs had a minimal impact on the overall state rating.

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Table 4: Qualified Investments*

Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Indianapolis MSA	33	37,252	45	70,931	78	45.88	108,183	56.38	0	0
Bloomington MSA	5	5,079	5	13,012	10	5.88	18,091	9.43	0	0
Columbus MSA	1	236	0	0	1	0.59	236	0.12	0	0
Elkhart MSA	4	1,660	3	18	7	4.12	1,678	0.87	0	0
Evansville MSA	13	17,492	0	0	13	7.65	17,492	9.12	0	0
Fort Wayne MSA	7	4,112	7	13,317	14	8.24	17,430	9.08	0	0
Lafayette MSA	2	5,437	3	1,003	5	2.94	6,440	3.36	0	0
Michigan City MSA	1	28	0	0	1	0.59	28	0.01	0	0
Terre Haute MSA	3	356	3	16	6	3.53	372	0.19	0	0
IN non-MSA	8	13,815	8	3,020	16	9.42	16,835	8.77	0	0
Broader Statewide or Regional Area	19	5,110	0	0	19	11.18	5,110	2.66	0	0
Total	96	90,577	74	101,317	170	100.00	191,894	100.00	0	0

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

The institution had an excellent level of qualified investments, including grants, but not in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current and prior period investments represented 12 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community development needs. Investments were particularly responsive to affordable housing needs. The institution did not use innovative and/or complex investments to support CD initiatives. By dollar volume during the current period, 75.6 percent of total investments and grants supported affordable housing, 23.7 percent promoted economic development, 0.4 percent supported community services to low- and moderate-income individuals, and 0.3 percent funded revitalization and stabilization efforts. The following are examples of qualified investments in the AA:

- The bank made a $11.5 million investment in a multi-investor LIHTC fund for the construction of 43 affordable housing units adjacent to a center for women and children experiencing homelessness, with the goal to provide integrated permanent housing for those

individuals. The bank demonstrated multifaceted support through an additional $8.7 million in construction financing.

- The bank made a $12 million investment in a multi-investor LIHTC fund for the construction of a 55-unit affordable housing development targeting those experiencing or at-risk for homelessness. All units are Section 8.

- The bank made a $15,000 grant to support microenterprise and small business development through an initiative aimed at helping disadvantaged individuals start or expand small businesses. The investment funds a program with a dedicated business coach serving small businesses located in low- and moderate-income census tracts.

Broader Statewide or Regional Area

In addition, the bank made 19 investments during the prior period with a remaining book value of $5.1 million in projects or organizations in the BSRA whose purpose, mandate, or function included serving the bank's AA. The BSRA investments supported the overall Investment Test rating.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Bloomington MSA AA, Elkhart MSA AA, Evansville MSA, Fort Wayne MSA AA, Lafayette MSA AA, and IN non-MSA AA was consistent with the bank's overall performance under the Investment Test in the full-scope area. Performance under the Investment Test in the Columbus MSA AA, Michigan City MSA AA, and Terre Haute MSA AA was weaker than the bank's overall performance under the Investment Test in the full-scope area due to a lower level of investment. Performance in the limited-scope AAs had minimal impact on the overall state rating.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

Table 5: Distribution of Branch Delivery Systems			2024
	Deposits	Branches	Population

Assessment Area	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Indianapolis MSA*	60.80	38	50.00	7.89	28.95	34.21	28.95	0.00	8.14	20.09	37.83	32.57	1.37
Bloomington MSA	2.61	3	3.95	33.33	0.00	0.00	66.67	0.00	6.32	16.25	33.08	32.43	11.92
Columbus MSA	0.87	1	1.32	0.00	0.00	100.00	0.00	0.00	0.00	22.42	64.81	12.78	0.00
Elkhart MSA	1.51	1	1.32	0.00	100.00	0.00	0.00	0.00	4.19	20.50	49.71	25.60	0.00
Evansville MSA	15.26	9	11.84	0.00	22.22	22.22	44.44	11.11	9.67	20.07	39.12	30.95	0.19
Fort Wayne MSA	3.93	5	6.58	0.00	20.00	60.00	20.00	0.00	6.36	20.61	38.28	34.06	0.70
Lafayette MSA	1.42	2	2.63	0.00	50.00	0.00	50.00	0.00	6.23	16.86	40.04	27.40	9.48
Michigan City MSA	1.79	2	2.63	0.00	100.00	0.00	0.00	0.00	0.00	26.43	48.86	21.94	2.77
Terre Haute MSA	2.71	4	5.26	0.00	0.00	75.00	0.00	25.00	5.87	23.70	36.81	30.41	3.21
IN non-MSA	9.10	11	14.47	0.00	27.27	63.64	9.09	0.00	0.92	7.85	64.89	26.34	0.00
Total	100.00	76	100.00	5.41	28.38	37.84	25.68	2.70	6.55	19.18	41.79	30.58	1.90

Source: FFIEC File - 2024 Census
1/1/2022 - 12/31/2024 Bank Data
Due to rounding, totals may not equal 100.0%
**# of Bank Branches in the Indianapolis MSA does not include one branch opened in Boone County in December 2024*

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

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income geographies approximated, and in moderate-income geographies exceeded, the percentage of the population living within those geographies.

The bank had several ADS including ATMs, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers and were positively considered in the service delivery systems conclusion. The bank had 51 ATMs in the AA, 46 of which were deposit-taking. Per data provided by the bank, as of the end of the evaluation period, bank customers located in low- and moderate-income geographies used online banking at a rate (42.5 percent) less than customers in middle- and upper-income geographies (54.9 percent), while mobile banking usage rates amongst customers in low- and moderate-income geographies (69.3 percent) were higher than that of customers in middle- and upper-income geographies (66 percent). During the evaluation period, online banking usage increased 3.8 percent for customers located in low- and moderate-income geographies and 5.2 percent for customers in middle- and upper-income geographies. Mobile banking usage increased 9.6 percent for customers in low- and moderate-income geographies and 10.2 percent for customers in middle- and upper-income geographies.

Table 6: Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Indianapolis MSA*	0	3	0	-1	-1	0	-1
Bloomington MSA	0	0	0	0	0	0	0
Columbus MSA	0	0	0	0	0	0	0
Elkhart MSA	0	0	0	0	0	0	0
Evansville MSA	1	3	0	1	-2	0	-1
Fort Wayne MSA	0	1	0	0	0	0	-1
Lafayette MSA	0	0	0	0	0	0	0
Michigan City MSA	0	0	0	0	0	0	0
Terre Haute MSA	0	0	0	0	0	0	0
IN non-MSA	0	1	0	0	0	-1	0
Total	1	8	0	0	-3	-1	-3
1/1/2022 - 12/31/2024 Bank Data. **# of Branch Openings does not include branch opened in December 2024 in Boone County.*							

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

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, the bank closed three branches, none of which were in low-income geographies and one of which was in a moderate-income geography. The branch closures were the result of low productivity and branch consolidation activities. The bank did not open branches during the evaluation period.

Services, including where appropriate, business hours did not vary in a way that inconvenienced its AA, particularly low- and moderate-income geographies and/or individuals. Average hours of operation for branches in low- and moderate-income geographies were comparable to those branches in middle- and upper-income geographies. The bank maintained standard business hours and offered traditional banking products and services at all branch locations in the AA, based upon the branch type. There were 37 Standard Banking Center branches in the AA, of which the majority had the same lobby hours of 9:00 a.m. to 5:00 p.m. Monday through Thursday, and 9:00 a.m. to 6:00 p.m. on Friday. There were 34 Standard Banking Center branches open from 9:00 a.m. to 12:00 p.m. on Saturdays including two of three low-income branches and all ten moderate-income branches. The bank also had one Bank Mart (in-store) branch located in a moderate-income geography which was open Monday through Friday 10:00 a.m. to 7:00 p.m. and on Saturday from 9:00 a.m. to 4:00 p.m. There were 35 Banking Center locations with drive-thru facilities, including all 13 branches in low- and moderate-income geographies. The Banking Mart location did not offer drive-thru facilities.

Community Development Services

The institution provided a limited level of CD services. During the evaluation period, bank employees provided 467 hours of qualified CD service activities to 20 organizations within this AA. Leadership is evident through board or committee participation, with ten employees

providing 356 service hours. Additionally, the bank hosted five eBus events in the Indianapolis MSA benefiting 301 individuals. The bank's assistance was responsive to identified needs in the AA, particularly with financial education. Service activity examples during the evaluation period include:

- A senior vice president with the bank provided 39 service hours on the board of a local CDFI that works to expand financial opportunities for low- and moderate-income individuals and underserved communities.

- Five bank employees provided financial education to students in grades 4-6 amounting to 32 service hours in partnership with an organization that works to prepare young people with the resources they need to overcome economic inequity.

- A regional president served on a board committee providing 91 service hours benefiting a youth apprenticeship initiative to reform Indiana's education and workforce development system. Through the initiative, 11th grade students participate in a three-year, paid work and learn program which culminates in a high school diploma, college credits, and an industry credential.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's retail service delivery systems performance under the Service Test in the Michigan City MSA AA and IN non-MSA AA was consistent with the bank's overall retail service delivery systems performance in the full-scope area. The bank's retail service delivery systems performance in the Bloomington MSA, Columbus MSA, Elkhart MSA, Evansville MSA, Fort Wayne MSA, Lafayette MSA and Terre Haute MSA AAs, was weaker than the bank's retail service delivery systems performance in the full-scope area due to weaker branch distributions. Performance differences in the limited-scope AAs had minimal impact on the overall state rating.

State of Kentucky

CRA rating for the State of Kentucky: Outstanding
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AA.
- The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank was a leader in making CD loans, which further supported the Lending Test rating.
- The bank had an excellent level of qualified CD investments and grants which were responsive in addressing community needs.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's full-scope AA. Weaker performance in the limited scope areas negatively impacted the retail service delivery systems conclusion and lowered the Service Test rating.
- The bank provided a limited level of CD services.

Description of Institution's Operations in Kentucky

The state of Kentucky consists of three AAs including portions of the Lexington-Fayette, KY MSA (Lexington MSA) and the Owensboro, KY MSA (Owensboro MSA), and eight nonmetropolitan counties comprising the Kentucky non-MSA (KY non-MSA) AA. Examiners combined the nonmetropolitan counties into one AA for analysis and presentation. Refer to the table in appendix A for a list of counties reviewed.

As of year-end 2024, the bank operated 21 branches and 28 deposit-taking ATMs in this rating area. The bank had $2.7 billion in adjusted deposits in this rating area, which represented 1.6 percent of the bank's total adjusted deposits. This rating area was the bank's 11th largest in terms of deposits held. During the evaluation period, the bank made $398.7 million or 1.5 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked first out of 50 FDIC-insured depository institutions with an 11.7 percent deposit market share in this rating area.

Lexington MSA AA

The following table provides a summary of the demographics, including housing and business information, for the Lexington MSA AA.

Assessment Area - FS - Lexington MSA						
						2022 - 2024
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	120	7.50	25.00	37.50	27.50	2.50
Population by Geography	452,968	6.29	22.85	38.73	30.06	2.07
Housing Units by Geography	195,047	6.78	23.30	38.80	29.17	1.96
Owner-Occupied Housing by Geography	104,606	3.28	17.91	40.68	37.74	0.39
Occupied Rental Units by Geography	74,384	10.61	30.25	36.82	18.29	4.04
Vacant Units by Geography	16,057	11.88	26.17	35.72	23.73	2.50
Businesses by Geography	22,637	4.66	18.46	36.09	35.03	5.76
Farms by Geography	1,363	2.93	15.85	43.51	34.41	3.30
Family Distribution by Income Level	108,884	21.80	16.91	19.88	41.41	0.00
Household Distribution by Income Level	178,990	23.97	16.52	17.23	42.28	0.00
Unemployment rate (%)	4.97	8.76	7.47	4.27	3.08	7.05
Households Below Poverty Level (%)	13.79	30.91	21.28	11.13	5.77	45.86
Median Family Income (30460 - Lexington-Fayette, KY MSA)		$78,944			**Median Housing Value**	$176,600
Median Family Income (30460 - Lexington-Fayette, KY MSA) for 2024		$95,200			**Median Gross Rent**	$876
					Families Below Poverty Level	9.57
FFIEC File - 2020 Census						
FFIEC File - 2024 Census 2024 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

The Lexington MSA AA consisted of Bourbon, Fayette, Jessamine, and Scott counties. As of year-end 2024, the bank operated 12 branches and 14 deposit-taking ATMs in this AA.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, the bank ranked third out of 35 FDIC-insured depository institutions with a 13.4 percent deposit market share in this AA. The top two competitors had 30.6 percent of the market share and included JPMorgan Chase Bank, N.A. with 12 branches and 15.5 percent deposit market share, and Central Bank & Trust Company with 16 branches and 15.1 percent deposit market share.

In the performance context, examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be $948. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Based on the 2024 median family income, the calculated maximum affordable monthly mortgage payment was $1,190 for a low-income borrower and $1,904 for a moderate-income borrower. Based on these calculations, housing was affordable for both low- and-moderate income borrowers. Community contacts (see below) noted affordable housing continues to be a community need despite these calculations.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For this AA, 9.6 percent of families were living below the poverty level.

Economic Data

Data from the August 2024 Moody's Analytics report indicates the Lexington metro experienced a cool-down in early 2024 but has since accelerated and is in the mid-expansion part of the business cycle. Job growth is higher than a year earlier, with healthcare and state government jobs leading the way. While manufacturing payrolls have been stagnant since early 2022, they remain at a two-decade high. Auto manufacturing is a key sector, particularly with the presence of Toyota Motor Manufacturing Kentucky in Scott County, which is the largest Toyota production facility globally. Labor force gains have caused the unemployment rate to edge higher. Major employers include the University of Kentucky, Toyota Motor Corp., Amazon, Baptist Health, Conduent, CHI Saint Joseph Health, Veterans Medical Center, Lockheed Martin, Lexmark International Inc., and Alltech Inc. House price appreciation has slowed to be on par with the state and nation. Area strengths include low business costs, a university presence that provides stability as well as an educated workforce, and an abundant amount of developable land. Weaknesses include a lack of high-paying job opportunities outside of manufacturing and weak migration trends and population growth.

According to the BLS, the non-seasonally adjusted unemployment rate for the Lexington MSA was 3.4 percent as of January 2022 and increased to 4.1 percent as of December 2024. The national unemployment rate was 3.9 percent as of December 2024.

Community Contacts

Examiners reviewed information from two community contact interviews conducted during the evaluation period. One organization focused on economic development and small businesses and the other was with a local county government. One contact indicated there is a lack of housing stock, and investment opportunities are restricted due to a majority of the land area having already been developed by businesses and housing developments. The contact also indicated

there is healthy competition for the limited opportunities that exist. These sources identified the following needs and opportunities within the community:

- Affordable housing
- First-time homebuyer assistance programs
- Small business loans

Scope of Evaluation in Kentucky

Examiners selected one AA for a full-scope review. Examiners conducted a full-scope review of the Lexington MSA AA as it is the largest AA in the state of Kentucky in terms of deposits, branches, and lending activity. The Owensboro MSA and KY non-MSA AAs received limited-scope reviews. Refer to the table in appendix A for more information.

Examiners based their ratings primarily on the results of the areas that received the full-scope reviews and the bank's performance in the limited-scope areas, as applicable. The Lexington MSA AA was the most heavily weighted when arriving at the overall conclusion for the state of Kentucky.

Examiners placed more emphasis on home mortgage loans than small loans to businesses in arriving at the overall conclusion for all AAs in the rating area as they represented the majority of lending in all AAs. The bank originated or purchased too few small loans to farms in all AAs in this rating area to conduct a meaningful analysis.

During the evaluation period, MSA boundary changes introduced in July 2023, effective January 1, 2024, by the United States OMB, impacted the Evansville, IN-KY MMSA. In 2024, Henderson County, Kentucky was reclassified as a non-MSA county in Kentucky. For 2022-2023, Henderson County was part of the Evansville, IN-KY MMSA. For 2024, Henderson County was added to the KY non-MSA AA.

Bank delineated AAs located in the same MSA are combined, analyzed, and presented as one AA for purposes of this evaluation. Similarly, bank delineated non-MSA AAs within the same state are combined, analyzed, and presented as one AA for purposes of this evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KENTUCKY

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Reviews

Based on a full-scope review, the bank's performance in the Lexington MSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Table 3: Lending Activity								2022 - 2024
Number of Loans								
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Consumer**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Lexington MSA	1,215	269	1	13	-	1,498	53.77	67.04
Owensboro MSA	226	20	0	3	-	249	8.94	4.96
KY non-MSA	906	99	12	22	-	1,039	37.29	28.00
Broader Statewide or Regional Area	0	0	0	0	-	0	NA	NA
Total	**2,347**	**388**	**13**	**38**	**-**	**2,786**	**100.00**	**100.00**
Dollar Volume of Loans ($000s)								
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Consumer**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Lexington MSA	229,809	42,003	9	49,700	-	321,521	70.02	67.04
Owensboro MSA	19,942	922	0	2,083	-	22,947	5.00	4.96
KY non-MSA	96,227	7,628	2,201	8,681	-	114,737	24.99	28.00
Broader Statewide or Regional Area	0	0	0	0	-	0	NA	NA
Total	**345,978**	**50,553**	**2,210**	**60,464**	**-**	**459,205**	**100.00**	**100.00**
Source: 1/1/2022 - 12/31/2024 Bank Data.								
Due to rounding, totals may not equal 100.0%								

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

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked third out of 35 FDIC-insured depository institutions (top 9 percent) with a 13.4 percent deposit market share.

For home mortgage loans, the bank's market share of 2.5 percent ranked 10th out of 333 lenders (top 4 percent). The top three lenders were University of Kentucky Federal Credit Union with 9.2 percent market share, Central Bank & Trust Co with 5.4 percent market share, and Commonwealth Credit Union with 4.6 percent market share.

For small loans to businesses, the bank's market share of 0.9 percent ranked 14th out of 94 lenders (top 15 percent). The top three lenders were American Express National Bank with 28.2 percent market share, JPMorgan Chase Bank, N.A. with 20.4 percent market share, and Synchrony Bank with 8.4 percent market share. The top small business lenders were institutions

with large business credit card portfolios with average loan sizes of $17,000 or less. FTB's average small business loan size was $148,000.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. The distribution of both home mortgage loans and small loans to businesses was good.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans was good. The percentage of home mortgage loans originated or purchased in low-income geographies exceeded both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies was below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was good. The percentage of small loans to businesses originated or purchased in low-income geographies was below both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AA. Examiners did not identify any unexplained conspicuous gaps in the full-scope AA reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution. The distribution of home mortgage loans was excellent and the distribution of loans to businesses of different sizes was good.

Home Mortgage Loans

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

The distribution of home mortgage loans among individuals of different income levels was excellent. The percentage of home mortgage loans originated or purchased to low-income borrowers was below the percentage of those families in the AA but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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

The distribution of loans to businesses of different sizes was good. The percentage of loans to small businesses originated or purchased was below the percentage of small businesses in the AA but exceeded the aggregate percentage of all reporting lenders.

Community Development Lending

The institution was a leader in making CD loans, which further supported the Lending Test conclusion.

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

The level of CD lending was excellent. During the evaluation period, FTB originated 13 CD loans totaling $49.7 million or 21.8 percent of allocated tier 1 capital. By dollar volume, 98 percent funded affordable housing, and 2 percent funded community services. CD loans were responsive to identified community needs including affordable housing. The following are examples of CD loans the bank originated or purchased in the AA:

- A $5.2 million loan to finance the rehabilitation of 204 units of affordable housing with 4 percent LIHTC funds. The majority of the units (203) were reserved for Housing Choice Voucher Tenants (Section 8) and seniors, aged 62 and above, and earning up to 60 percent of the area median income. The bank demonstrated multifaceted support through an additional $12.3 million investment in the project, as described below under the Investment Test.

- A $31 million loan to finance the construction of a 252-unit LIHTC housing development. The units are reserved for households earning below 60 percent of the area median income.

- A $3.4 million line of credit to provide liquidity to fund mortgages for low- and moderate-income individuals.

Product Innovation and Flexibility

The institution made limited use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank originated or purchased 131 loans under its flexible lending programs totaling $21.1 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for details regarding the programs offered.

Conclusions for Areas Receiving Limited-Scope Reviews

Refer to Tables 7 through 10 in the state of Kentucky section of appendix D for the facts and data that support the limited-scope conclusions.

Based on a limited-scope review, the bank's performance under the Lending Test in the Owensboro MSA AA was consistent with the bank's overall performance under the Lending Test in the full-scope area. Based on a limited-scope review, the bank's performance under the Lending Test in the KY non-MSA AA was weaker than the bank's overall performance under the Lending Test in the full-scope area. The weaker performance in the KY non-MSA AA was due to a weaker geographic and borrower distribution. Performance in the limited-scope AAs had a minimal impact on the overall state rating.

INVESTMENT TEST

The bank's performance under the Investment Test in Kentucky is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Lexington MSA AA was excellent.

Table 4: Qualified Investments*

Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Lexington MSA	10	11,059	8	15,689	18	37.50	26,748	71.91	0	0
Owensboro MSA	3	25	0	0	3	6.25	25	0.07	0	0
KY non-MSA	9	5,279	5	2,704	14	29.17	7,983	21.46	0	0
Broader Statewide or Regional Area	12	2,441	1	2	13	27.08	2,442	6.56	0	0
Total	34	18,804	14	18,395	48	100.00	37,198	100.00	0	0

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

The institution had an excellent level of qualified investments, including grants, but not in a leadership position, particularly those that are not routinely provided by private investors. The

dollar volume of current and prior period investments represented 11.7 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community development needs. The institution occasionally used innovative and/or complex investments to support CD initiatives. By dollar volume during the current period, 81.6 percent of total investments and grants supported affordable housing, 18.3 percent promoted economic development, and 0.1 percent supported community services to low- and moderate-income individuals. The following are examples of qualified investments in the AA:

- The bank made a $12.3 million investment in a multi-investor LIHTC fund to renovate 204 affordable housing units, 203 of which are Section 8 and reserved for seniors aged 62 and above who earn up to 60 percent of the area median income. The investment responded to the community-identified need for affordable housing. Further, the bank demonstrated a multifaceted approach by also providing $5.2 million in financing, as discussed above under CD lending.

- The bank made a complex $2.8 million New Market Tax Credit and federal and state historic tax credit investment to renovate seven scattered-site residential and commercial properties in a qualified low-income historic district community. The project created approximately 10 new permanent jobs, with the majority of hiring coming from the surrounding low-income community.

Broader Statewide or Regional Area

In addition, the bank made 13 investments totaling $2.4 million in projects or organizations in the BSRA whose purpose, mandate, or function included serving the bank's AA. Of these, 12 investments were from the prior period with a remaining book value of $2.4 million. The BSRA investments supported the overall Investment Test conclusion.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Investment Test in the KY non-MSA AA was consistent with the bank's overall performance under the Investment Test in the full-scope area. Performance under the Investment Test in the Owensboro MSA AA was weaker than the bank's overall performance under the Investment Test in the full-scope area due to a lower level of investment. Performance in the limited-scope AAs had minimal impact on the overall state rating.

SERVICE TEST

The bank's performance under the Service Test in Kentucky is rated Low Satisfactory. Weaker performance in the limited-scope AAs negatively impacted the retail service delivery systems conclusion and lowered the Service Test rating.

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

Table 5: Distribution of Branch Delivery Systems														2024
Assessment Area	Deposits	Branches							Population					
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography					
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA	
Lexington MSA	67.04	12	57.14	8.33	25.00	16.67	41.67	8.33	6.29	22.85	38.73	30.06	2.07	
Owensboro MSA	4.96	2	9.52	0.00	0.00	50.00	0.00	50.00	0.00	21.09	55.28	21.67	1.95	
KY non-MSA	28.00	7	33.33	0.00	0.00	42.86	57.14	0.00	1.71	5.32	45.01	47.96	0.00	
Total	100.00	21	100.00	4.76	14.29	28.57	42.86	9.52	3.93	16.52	42.92	35.29	1.33	
Source: FFIEC File - 2024 Census														
1/1/2022 - 12/31/2024 Bank Data														
Due to rounding, totals may not equal 100.0%														

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

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in both low-income and moderate-income geographies exceeded the percentage of the population living within those geographies.

The bank had several ADS including ATMs, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers and were positively considered in the service delivery systems conclusion. The bank had 20 ATMs in the AA, 14 of which were deposit-taking. Per data provided by the bank, as of the end of the evaluation period, bank customers located in low- and moderate-income geographies used online banking at a rate (44.6 percent) less than customers in middle- and upper-income geographies (56.6 percent), while mobile banking usage rates amongst customers in low- and moderate-income geographies (67.6 percent) were comparable to that of customers in middle- and upper-income geographies (68 percent). During the evaluation period, online banking usage increased 6.9 percent for customers located in low- and moderate-income geographies and 9.5 percent for customers in middle- and upper-income geographies. Mobile banking usage increased 7.6 percent for customers in low- and moderate-income geographies and 9.2 percent for customers in middle- and upper-income geographies.

Table 6: Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Lexington MSA	0	0	0	0	0	0	0
Owensboro MSA	0	0	0	0	0	0	0
KY non-MSA	0	3	0	0	-3	0	0
Total	0	3	0	0	-3	0	0
1/1/2022 - 12/31/2024 Bank Data.							

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

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly low- and moderate-income geographies and/or individuals. The bank maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. Average hours of operation for branches in low- and moderate-income geographies were comparable to those branches in middle- and upper-income geographies. All AA branches had the same lobby hours of 9:00 a.m. to 5:00 p.m. Monday through Thursday and 9:00 a.m. to 6:00 p.m. on Friday. Of the 12 AA branches, 11 (including all branches located in low- and moderate-income geographies) were open from 9:00 a.m. to 12:00 p.m. on Saturdays. All 12 branch locations in the AA had drive-thru facilities.

Community Development Services

The institution provided a limited level of CD services. During the evaluation period, bank employees provided 84 hours of qualified CD service activities to six organizations within this AA. Leadership is evident through board or committee participation, with four employees providing 82 service hours. Additionally, the bank hosted one eBus event in the Lexington MSA benefiting 75 individuals. Service activity examples during the evaluation period include:

- Two bank employees each had turns serving on the board of an economic development organization operating in Lexington providing a total 58 service hours over the evaluation period.

- In 2024, a bank vice president provided six hours of service on the board of an organization that provides affordable housing for single parents and their children.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's retail service delivery systems performance under the Service Test in the Owensboro MSA AA and KY non-MSA AA was weaker than the bank's overall retail service delivery systems performance in the full-scope area due to weaker branch distributions. Weaker performance in the limited-scope AAs negatively impacted the retail service delivery systems conclusion and lowered the overall state rating.

State of Michigan

CRA rating for the State of Michigan: Outstanding
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments and grants which were responsive in addressing community needs.
- Service delivery systems were overall readily accessible to geographies and individuals of different income levels in the institution's AAs with consideration for middle- and upper-income adjacent and proximate branches and ADS.
- The bank was overall a leader in providing CD services. CD services were responsive in addressing community needs.

Description of Institution's Operations in Michigan

The state of Michigan consists of 16 AAs. They include the entirety of the Ann Arbor, MI MSA (Ann Arbor MSA), the Battle Creek, MI MSA (Battle Creek MSA), the Bay City, MI MSA (Bay City MSA), the Flint, MI MSA (Flint MSA), the Jackson, MI MSA (Jackson MSA), the Kalamazoo-Portage, MI MSA (Kalamazoo MSA), the Lansing-East Lansing, MI MSA (Lansing MSA), the Midland, MI MSA (Midland MSA), the Monroe, MI MSA (Monroe MSA), the Muskegon-Norton Shores, MI MSA (Muskegon MSA), the Niles, MI MSA (Niles MSA), and the Saginaw, MI MSA (Saginaw MSA), portions of the Detroit-Warren-Dearborn, MI MSA (Detroit MSA), the Grand Rapids-Wyoming-Kentwood, MI MSA (Grand Rapids MSA), the Traverse City, MI MSA (Traverse City MSA), and 15 nonmetropolitan counties comprising the Michigan non-MSA (MI non-MSA) AA. Examiners combined the nonmetropolitan counties into one AA for analysis and presentation. Refer to the table in appendix A for a list of counties reviewed.

As of year-end 2024, the bank operated 160 branches and 231 deposit-taking ATMs in this rating area. The bank had $20.2 billion in adjusted deposits in this rating area, which represented 12.3 percent of the bank's total adjusted deposits. This rating area was the bank's fourth largest in terms of deposits held. During the evaluation period, the bank made $3.6 billion or 13.5 percent

of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked seventh out of 80 FDIC-insured depository institutions with a 7.1 percent deposit market share in this rating area. The top three competitors had 45.7 percent of the market share and were JPMorgan Chase Bank, N.A. with 172 branches and 20.6 percent deposit market share, Comerica Bank with 159 branches and 13.3 percent deposit market share, and Huntington National Bank with 259 branches and 11.8 percent deposit market share.

Detroit MSA AA

The following table provides a summary of the demographics, including housing and business information, for the Detroit MSA AA.

Assessment Area - FS - Detroit MSA						
						2022 - 2024
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	1,332	9.46	25.38	29.88	28.90	6.38
Population by Geography	4,303,422	7.88	24.96	32.71	33.62	0.83
Housing Units by Geography	1,874,147	9.20	26.51	32.18	30.98	1.13
Owner-Occupied Housing by Geography	1,170,117	4.51	21.28	34.94	38.82	0.46
Occupied Rental Units by Geography	522,243	15.97	34.32	29.49	18.39	1.84
Vacant Units by Geography	181,787	19.96	37.70	22.19	16.70	3.45
Businesses by Geography	208,075	7.01	22.56	30.21	38.18	2.04
Farms by Geography	5,621	6.26	21.94	38.05	32.86	0.89
Family Distribution by Income Level	1,058,946	21.80	16.98	19.91	41.31	0.00
Household Distribution by Income Level	1,692,360	24.82	15.75	17.09	42.33	0.00
Unemployment rate (%)	6.52	13.77	9.18	5.49	4.10	19.06
Households Below Poverty Level (%)	13.31	35.58	19.80	9.85	5.59	38.51
Median Family Income (19804 - Detroit-Dearborn-Livonia, MI MD)		$63,896			**Median Housing Value**	$148,900
Median Family Income (47664 - Warren-Troy-Farmington Hills, MI MD)		$92,419			**Median Gross Rent**	$955
Median Family Income (19804 - Detroit-Dearborn-Livonia, MI MD) for 2024		$77,800			**Families Below Poverty Level**	9.88
Median Family Income (47664 - Warren-Troy-Farmington Hills, MI MD) for 2024		$109,700				
FFIEC File - 2020 Census						
FFIEC File - 2024 Census 2024 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

The Detroit MSA AA consisted of Livingston, Macomb, Oakland, St. Clair, and Wayne counties. As of year-end 2024, the bank operated 62 branches and 76 deposit-taking ATMs in this AA.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, the bank ranked seventh out of 40 FDIC-insured depository institutions with a 3.7 percent deposit market share in this AA. The top three competitors had 58.5 percent of the market share and included JPMorgan Chase Bank, N.A. with 105 branches and 25.1 percent deposit market share, Comerica Bank with 120 branches and 18 percent deposit market share, and Flagstar Bank, N.A. with 61 branches and 15.4 percent deposit market share.

In the performance context, examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be $800. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Based on the 2024 median family income, the calculated maximum affordable monthly mortgage payment ranged between $973 and $1,371 for a low-income borrower and between $1,556 and $2,194 for a moderate-income borrower, depending on the MD. Based on these calculations, housing was affordable for both low- and moderate-income borrowers. Community contacts (see below) noted affordable housing continues to be a community need despite these calculations.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For this AA, 9.9 percent of families were living below the poverty level.

Economic Data

Data from the October 2024 Moody's Analytics report indicates the Detroit metro economy is slowing down. The size of the labor force was lower than at the beginning of 2024, and the jobless rate edged higher. Auto manufacturing remains a critical sector, and over half of the metro's factory jobs are concentrated in transportation equipment manufacturing. Detroit is a magnet for logistics companies due to the metro having an expansive manufacturing sector as well as it being the busiest border crossing between the United States and Canada. Major employers include Ford Motor Co., Rocket Cos. Inc., Henry Ford Health, Corewell Health, Blue Cross Blue Shield of Michigan, and Detroit Medical Center. After being slow for most of the year, house price appreciation near the end of 2024 outpaced the nation and worsens home affordability issues. Area strengths include a high concentration of the auto industry headquarters, production, and research and development as well as low costs of living and doing business. Weaknesses include a below-average quality of life, high crime rate, and eroding infrastructure as well as a rapidly shrinking population and a below-average working-age group.

According to the BLS, the non-seasonally adjusted unemployment rate for the Detroit MSA was 5 percent as of January 2022 and decreased to 4.7 percent as of December 2024. The national unemployment rate was 3.9 percent as of December 2024.

Community Contacts

Examiners reviewed information from two community contact interviews conducted during the evaluation period. The organization focused on economic development and small businesses. These sources identified the following needs and opportunities within the community:

- Small business loans
- Technical assistance and mentoring for small businesses
- Affordable housing and home improvement in low- and moderate-income geographies

Grand Rapids MSA AA

The following table provides a summary of the demographics, including housing and business information, for the Grand Rapids MSA AA.

Assessment Area - FS - Grand Rapids MSA						
						2022 - 2024
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	224	4.46	20.09	49.11	24.55	1.79
Population by Geography	1,020,788	3.89	18.99	47.48	28.76	0.88
Housing Units by Geography	396,338	3.17	19.57	49.38	26.68	1.20
Owner-Occupied Housing by Geography	273,439	1.39	15.38	49.37	32.79	1.07
Occupied Rental Units by Geography	100,085	7.82	28.65	50.27	11.81	1.45
Vacant Units by Geography	22,814	4.16	29.92	45.58	18.62	1.72
Businesses by Geography	37,329	2.14	19.06	43.30	34.74	0.77
Farms by Geography	1,579	0.82	14.12	49.78	34.64	0.63
Family Distribution by Income Level	254,352	18.13	18.18	23.05	40.65	0.00
Household Distribution by Income Level	373,524	21.97	16.65	19.68	41.69	0.00
Unemployment rate (%)	4.40	11.42	5.44	3.95	3.62	6.15
Households Below Poverty Level (%)	9.75	33.85	16.12	8.73	4.34	11.20
Median Family Income (24340 - Grand Rapids-Wyoming-Kentwood, MI MSA)		$79,594		**Median Housing Value**		$182,750
Median Family Income (24340 - Grand Rapids-Wyoming-Kentwood, MI MSA) for 2024		$97,600		**Median Gross Rent**		$895
				Families Below Poverty Level		6.38
FFIEC File - 2020 Census						
FFIEC File - 2024 Census 2024 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

The Grand Rapids MSA AA consisted of Kent, Montcalm, and Ottawa counties. As of year-end 2024, the bank operated 36 branches and 64 deposit-taking ATMs in this AA.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, the bank ranked first out of 27 FDIC-insured depository institutions with a 19.6 percent deposit market share in this AA.

In the performance context, examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be $981. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Based on the 2024 median family income, the calculated maximum affordable monthly mortgage payment was $1,220 for a low-income borrower and $1,952 for a moderate-income borrower. Based on these calculations, housing was affordable for both low- and moderate-income borrowers. However, one community contact discussed home affordability challenges and stated incomes have not kept pace with the housing market. This contact indicated minimum wage is not sufficient to make mortgage payments affordable.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For this AA, 6.4 percent of families were living below the poverty level.

Economic Data

Data from the October 2024 Moody's Analytics report indicates the Grand Rapids metro experienced payroll growth in the latter half of 2024, following a challenging start in the first half of the year. Manufacturers performed better than office-using industries over the year, and manufacturing is well distributed across several types of production. The finance, professional services, and tech sectors are becoming more critical as healthcare and manufacturing growth slows. Labor force growth is bumping the unemployment rate higher. Major employers include Corewell Health, Trinity Health, Meritage Hospitality Group Inc., Gordon Food Service, and Meijer Inc. Slower housing price growth is putting the Grand Rapids metro more in line with the state. The prime working-age population grew faster than the nation over the past decade, as has the share of college-educated residents. Area strengths include the area being a growing biotech and healthcare center, a pro-business environment, diverse manufacturing base including technologically advanced producers, and a strong base of middle-income jobs. Weaknesses include a reliance on the domestic vehicle industry, an overvalued housing market, and a below-average share of high-wage jobs.

According to the BLS, the non-seasonally adjusted unemployment rate for the Grand Rapids MSA was 3.8 percent as of January 2022 and increased to 4.3 percent as of December 2024. The national unemployment rate was 3.9 percent as of December 2024.

Community Contacts

Examiners reviewed information from two community contact interviews conducted during the evaluation period. The organizations focused on affordable housing and housing services. One contact stated incomes have not kept pace with the housing market and many people working minimum wage jobs need to either find new jobs or resort to homelessness. Minimum wage is not sufficient to make mortgage payments affordable. One contact indicated there is a lack of available land for development within the city of Grand Rapids, impeding the ability of developers to supply new affordable housing. These sources identified the following needs and opportunities within the community:

- Donations to nonprofit organizations that construct and rehabilitate affordable housing.
- Purchasing loans from and providing funding to nonprofit affordable housing organizations to provide needed liquidity to build more or improve existing housing.
- Flexible and innovative programs that include below-market rates to boost affordability and "piggyback seconds".
- Flexible mortgage underwriting.

Scope of Evaluation in Michigan

Examiners selected two AAs for full-scope reviews. Examiners conducted a full-scope review of the Detroit MSA AA and the Grand Rapids MSA AA.

The Detroit MSA AA accounted for 35.8 percent of deposits, 38.8 percent of branches, and 30.7 percent of lending within the state during the evaluation period. Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked seventh out of 40 FDIC-insured depository institutions with a 3.7 percent deposit market share. FTB closed three branches in this AA during the evaluation period.

The Grand Rapids MSA AA accounted for 27.3 percent of deposits, 22.5 percent of branches, and 25.3 percent of lending within the state during the evaluation period. Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked first out of 27 FDIC-insured depository institutions with a 19.6 percent deposit market share. FTB closed six branches in this AA during the evaluation period.

The Ann Arbor MSA, Battle Creek MSA, Bay City MSA, Flint MSA, Jackson MSA, Kalamazoo MSA, Lansing MSA, Midland MSA, Monroe MSA, Muskegon MSA, Niles MSA, Saginaw MSA, Traverse City MSA, and MI non-MSA AAs received limited-scope reviews. Refer to the table in appendix A for more information.

Examiners based their ratings primarily on the results of the areas that received the full-scope reviews and the bank's performance in the limited-scope areas, as applicable. The Detroit MSA

AA was the most heavily weighted when arriving at the overall conclusion for the state of Michigan.

Examiners placed more emphasis on home mortgage loans than small loans to businesses in arriving at the overall conclusion for all AAs in the rating area as they represented the majority of lending in all AAs. For the Bay City AA, there were too few small loans to businesses to conduct a meaningful analysis. The bank originated or purchased too few small loans to farms in all AAs in this rating area to conduct a meaningful analysis.

During the evaluation period, MSA boundary changes introduced in July 2023, effective January 1, 2024, by the United States OMB, resulted in the removal of Shiawassee County from the Lansing MSA AA and the reclassification of Shiawassee County to a non-MSA county. For 2022-2023, Shiawassee County is included in the Lansing MSA AA and for 2024, Shiawassee County is included in the MI non-MSA AA. Additionally, Grand Traverse and Leelanau counties were removed from the MI non-MSA and reclassified to the Traverse City MSA AA. For 2022-2023, Grand Traverse and Leelanau counties are included in the MI non-MSA AA and for 2024, they are included in the Traverse City MSA AA.

Bank delineated AAs located in the same MSA are combined, analyzed, and presented as one AA for purposes of this evaluation. Similarly, bank delineated non-MSA AAs within the same state are combined, analyzed, and presented as one AA for purposes of this evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MICHIGAN

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Detroit MSA AA and Grand Rapids MSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to credit needs in the AAs.

Table 3: Lending Activity								2022 - 2024
Number of Loans								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Detroit MSA	5,103	2,198	2	12	-	7,315	30.26	35.76
Grand Rapids MSA	4,892	1,197	6	28	-	6,123	25.33	27.32

Ann Arbor MSA	246	59	1	1	-	307	1.27	1.36
Battle Creek MSA	398	54	0	1	-	453	1.87	1.16
Bay City MSA	83	14	0	0	-	97	0.40	0.24
Flint MSA	392	151	0	2	-	545	2.25	2.11
Jackson MSA	265	34	0	2	-	301	1.25	0.45
Kalamazoo MSA	818	201	0	2	-	1,021	4.22	5.54
Lansing MSA	1,457	295	1	1	-	1,754	7.26	5.37
Midland MSA	84	32	0	0	-	116	0.48	0.32
Monroe MSA	639	93	1	1	-	734	3.04	1.72
Muskegon MSA	903	159	0	0	-	1,062	4.39	2.64
Niles MSA	578	104	10	1	-	693	2.87	3.40
Saginaw MSA	135	59	0	0	-	194	0.80	0.50
Traverse City MSA	170	42	0	3	-	215	0.89	3.53
MI non-MSA	2,662	570	5	4	-	3,241	13.41	8.59
Broader Statewide or Regional Area	0	0	0	1	-	1	0.00	NA
Total	**18,825**	**5,262**	**26**	**59**	**-**	**24,172**	**100.00**	**100.00**

Dollar Volume of Loans ($000s)

Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Detroit MSA	797,657	381,202	313	68,616	-	1,247,788	32.30	35.76
Grand Rapids MSA	806,769	185,003	181	74,935	-	1,066,888	27.62	27.32
Ann Arbor MSA	65,776	7,559	15	1,250	-	74,600	1.93	1.36
Battle Creek MSA	52,407	8,585	0	100	-	61,092	1.58	1.16
Bay City MSA	8,662	597	0	0	-	9,259	0.24	0.24
Flint MSA	41,277	29,119	0	14,500	-	84,896	2.20	2.11
Jackson MSA	31,124	7,126	0	100	-	38,350	0.99	0.45
Kalamazoo MSA	127,091	26,361	0	1,580	-	155,032	4.01	5.54
Lansing MSA	169,772	45,944	26	12,000	-	227,742	5.90	5.37
Midland MSA	10,054	3,227	0	0	-	13,281	0.34	0.32
Monroe MSA	73,989	11,793	15	2,500	-	88,297	2.29	1.72
Muskegon MSA	99,058	23,367	0	0	-	122,425	3.17	2.64
Niles MSA	79,016	9,948	1,220	2,500	-	92,684	2.40	3.40
Saginaw MSA	17,038	9,921	0	0	-	26,959	0.70	0.50
Traverse City MSA	40,569	8,083	0	18,500	-	67,152	1.74	3.53
MI non-MSA	377,993	88,197	71	13,353	-	479,614	12.42	8.59
Broader Statewide or Regional Area	0	0	0	6,515	-	6,515	0.17	NA
Total	**2,798,252**	**846,032**	**1,841**	**216,449**	**-**	**3,862,574**	**100.00**	**100.00**

Source: 1/1/2022 - 12/31/2024 Bank Data.

Due to rounding, totals may not equal 100.0%

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

Detroit MSA AA

Lending levels reflected excellent responsiveness to AA credit needs.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked seventh out of 40 FDIC-insured depository institutions (top 18 percent) with a 3.7 percent deposit market share.

For home mortgage loans, the bank's market share of 1.5 percent ranked 16th out of 631 lenders (top 3 percent). The top three lenders were United Wholesale Mortgage with 11.5 percent market share, Rocket Mortgage with 10 percent market share, and Huntington National Bank with 4 percent market share.

For small loans to businesses, the bank's market share of 0.7 percent ranked 15th out of 174 lenders (top 9 percent). The top three lenders were American Express National Bank with 28.9 percent market share, JPMorgan Chase Bank, N.A. with 22.4 percent market share, and Bank of America, N.A. with 7.6 percent market share. The top small business lenders were institutions with large business credit card portfolios with average loan sizes of $25,000 or less. FTB's average small business loan size was $181,000.

Grand Rapids MSA AA

Lending levels reflected excellent responsiveness to AA credit needs.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked first out of 27 FDIC-insured depository institutions with a 19.6 percent deposit market share.

For home mortgage loans, the bank's market share of 4.9 percent ranked third out of 413 lenders (top 1 percent). The top two lenders were Lake Michigan Credit Union with 20.4 percent market share and Huntington National Bank with 6.5 percent market share.

For small loans to businesses, the bank's market share of 2.1 percent ranked 10th out of 104 lenders (top 10 percent). The top three lenders were JPMorgan Chase Bank, N.A. with 25.5 percent market share, American Express National Bank with 20.1 percent market share, and Capital One, N.A. with 8.5 percent market share. The top small business lenders were institutions with large business credit card portfolios with average loan sizes of $18,000 or less. FTB's average small business loan size was $157,000.

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AAs. The geographic distribution of home mortgage loans was adequate and the geographic distribution of small loans to businesses was good.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans was adequate. The distribution of home mortgage loans in the Detroit MSA AA was adequate and in the Grand Rapids MSA AA was good.

Detroit MSA AA

The geographic distribution of home mortgage loans was adequate. The percentage of home mortgage loans originated or purchased in low-income geographies was well below the percentage of owner-occupied housing units located in those geographies and was below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies was below the percentage of owner-occupied housing units located in those geographies but was near to the aggregate percentage of all reporting lenders.

Grand Rapids MSA AA

The geographic distribution of home mortgage loans was good. The percentage of home mortgage loans originated or purchased in low-income geographies exceeded the percentage of owner-occupied housing units located in those geographies but was well below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies approximated the percentage of owner-occupied housing units located in those geographies but was below the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was good. The distribution of small loans to businesses in the Detroit MSA AA was good and in the Grand Rapids MSA AA was excellent.

Detroit MSA AA

The geographic distribution of small loans to businesses was good. The percentage of small loans to businesses originated or purchased in low-income geographies was below the percentage of businesses located in those geographies but approximated the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

Grand Rapids MSA AA

The geographic distribution of small loans to businesses was excellent. The percentage of small loans to businesses originated or purchased in low-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AAs. Examiners did not identify any unexplained conspicuous gaps in the full-scope AAs reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution. The distribution of home mortgage loans was excellent and the distribution of loans to businesses of different sizes was adequate.

Home Mortgage Loans

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

The distribution of home mortgage loans was excellent. The distribution of loans by income level of the borrower in the Detroit MSA AA and the Grand Rapids MSA AA was excellent.

Detroit MSA AA

The distribution of home mortgage loans among individuals of different income levels was excellent. The percentage of home mortgage loans originated or purchased to low-income borrowers was below the percentage of those families in the AA but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate percentage of all reporting lenders.

Grand Rapids MSA AA

The distribution of home mortgage loans among individuals of different income levels was excellent. The percentage of home mortgage loans originated or purchased to low-income borrowers was near to the percentage of those families in the AA and exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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

The distribution of loans to businesses of different sizes was adequate. The distribution of loans in the Detroit MSA AA was adequate and the distribution in the Grand Rapids MSA AA was good.

Detroit MSA AA

The distribution of loans to businesses of different sizes was adequate. The percentage of loans to small businesses originated or purchased was well below the percentage of small businesses in the AA but exceeded the aggregate percentage of all reporting lenders.

Grand Rapids MSA AA

The distribution of loans to businesses of different sizes was good. The percentage of loans to small businesses originated or purchased was below the percentage of small businesses in the AA but exceeded the aggregate percentage of all reporting lenders.

Community Development Lending

The institution was a leader in making CD loans.

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

Detroit MSA AA

The level of CD lending was excellent. CD lending had a positive impact on the Lending Test conclusion. During the evaluation period, FTB originated 12 CD loans totaling $68.6 million or 7.4 percent of allocated tier 1 capital. By dollar volume, 84.6 percent funded affordable housing, 12 percent funded economic development, and 3.4 percent funded community services. CD loans

were responsive to identified community needs including affordable housing. The following are examples of CD loans the bank originated or purchased in the AA:

- A $6 million loan to finance the construction of a mixed-use LIHTC project. The project consists of a four-story, 33-unit apartment community and approximately 1,000 square feet of commercial space.

- An innovative $7.9 million loan to support the first Michigan State Housing Development Authority's modular affordable housing construction. This LIHTC project consists of 150 units that are restricted to households earning less than 80 percent of the area median income. The bank demonstrated multifaceted support through a $10.6 million equity investment in the project.

- A $21.5 million loan to finance the land acquisition and construction of a 351-unit LIHTC project in Detroit. All units include Section 8 contracts.

Grand Rapids MSA AA

The level of CD lending was excellent, which further supported the Lending Test conclusion. During the evaluation period, FTB originated 28 CD loans totaling $74.9 million or 10.6 percent of allocated tier 1 capital. By dollar volume, 48.5 percent funded economic development, 47.2 percent funded affordable housing, and 4.3 percent funded community services. CD loans were responsive to identified community needs including affordable housing. The following are examples of CD loans the bank originated or purchased in the AA:

- A $12.6 million loan to finance the renovation of a vacant building into 56 units of affordable housing. The capital stack includes LIHTC funds, a Hope Network Seller note, HUD financing, and a permanent loan.

- A $10.8 million loan to finance the renovation of an existing vacant building into 62 units of affordable housing. The capital stack includes LIHTC equity, sponsor note, HUD financing and a permanent loan. The bank demonstrated multifaceted support by also providing an $18.9 million equity investment in the Phase II.

- A $12 million loan to a state housing tax credit equity fund to support affordable housing. The loan bridges the gap in investor equity for LIHTC projects.

Broader Statewide or Regional area

In addition, the bank made one CD loan totaling $6.5 million in the BSRA whose purpose, mandate, or function did not include serving the bank's AA. The BSRA lending supported the Lending Test rating.

Product Innovation and Flexibility

The institution made limited use of innovative and/or flexible lending practices in order to serve AA credit needs. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for details regarding the programs offered.

Detroit MSA AA

The institution made limited use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank originated or purchased 726 loans under its flexible lending programs totaling $121.2 million.

Grand Rapids MSA AA

The institution made limited use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank originated or purchased 521 loans under its flexible lending programs totaling $106.5 million.

Conclusions for Areas Receiving Limited-Scope Reviews

Refer to Tables 7 through 10 in the state of Michigan section of appendix D for the facts and data that support the limited-scope conclusions.

Based on limited-scope reviews, the bank's performance under the Lending Test in the Battle Creek MSA AA, Flint MSA AA, Jackson MSA AA, Lansing MSA AA, Monroe MSA AA, Niles MSA AA, Traverse City MSA AA, and the MI non-MSA AA was consistent with the bank's overall performance under the Lending Test in the full-scope areas. The bank's performance under the Lending Test in the Ann Arbor MSA AA, Bay City MSA AA, Kalamazoo MSA AA, Midland MSA AA, Muskegon MSA AA, and the Saginaw MSA AA was weaker than the bank's overall performance under the Lending Test in the full-scope areas. The weaker performance in the Ann Arbor MSA AA was due to a weaker borrower distribution. The weaker performance in the Bay City MSA AA, Midland MSA AA, and the Saginaw MSA AA was due to weaker lending activity and a lack of CD lending. The weaker performance in the Kalamazoo MSA AA and the Muskegon MSA AA was due to a lower level of CD lending. Performance in the limited-scope AAs had a minimal impact on the overall state rating.

INVESTMENT TEST

The bank's performance under the Investment Test in Michigan is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in both the Detroit MSA AA and Grand Rapids MSA AA was excellent.

Table 4: Qualified Investments*										
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Detroit MSA	61	63,816	41	74,009	102	24.94	137,825	40.09	0	0
Grand Rapids MSA	36	35,864	70	53,825	106	25.92	89,689	26.09	0	0
Ann Arbor MSA	5	4,071	3	3,008	8	1.96	7,079	2.06	0	0
Battle Creek MSA	6	406	2	28	8	1.96	434	0.13	0	0
Bay City MSA	1	1,312	2	8	3	0.73	1,320	0.38	0	0
Flint MSA	11	6,539	5	2,513	16	3.91	9,052	2.63	0	0
Jackson MSA	3	2	1	1,000	4	0.98	1,002	0.29	0	0
Kalamazoo MSA	9	9,349	13	5,984	22	5.38	15,333	4.46	0	0
Lansing MSA	17	18,575	13	9,636	30	7.33	28,211	8.21	0	0
Midland MSA	1	128	1	1	2	0.49	129	0.04	0	0
Monroe MSA	3	481	1	3	4	0.98	484	0.14	0	0
Muskegon MSA	3	1,061	7	5,299	10	2.44	6,360	1.85	0	0
Niles MSA	8	2,982	7	3,434	15	3.67	6,416	1.87	0	0
Saginaw MSA	5	66	2	1,189	7	1.71	1,255	0.37	0	0
Traverse City MSA	11	5,894	9	8,042	20	4.89	13,936	4.05	0	0
MI non-MSA	33	12,561	5	12,086	38	9.29	24,647	7.17	0	0
Broader Statewide or Regional Area	11	610	3	33	14	3.42	643	0.19	0	0
Total	224	163,717	185	180,098	409	100.00	343,815	100.00	0	0

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

Detroit MSA AA

The institution had an excellent level of qualified investments, including grants, but not in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current and prior period investments represented 14.9 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community development needs. The institution rarely used innovative and/or complex investments to support CD initiatives. By dollar volume during the current period, 67.4 percent of total investments and grants supported affordable housing, 31.3 percent promoted economic development, 0.7 percent funded revitalization and stabilization efforts, and 0.6 percent supported community services to low- and moderate-income individuals. The following are examples of qualified investments that were responsive to the identified affordable housing needs in the AA:

- The bank made a $10.6 million investment in a multi-investor LIHTC fund to support a 150-unit affordable housing development for households earning 30 to 60 percent of the area median income, with 36 of the units receiving subsidies such that tenants pay 30 percent of income toward rent. The investment was innovative as it supported the first state-approved

affordable housing development comprised of modular construction, whose factory-built units cannot be used as collateral until completed and delivered to the site. The bank demonstrated a multifaceted approach by also providing $7.9 million in construction financing.

- The bank made a $6.8 million investment in a multi-investor LIHTC fund to construct a 33-unit affordable housing development, where 12 units are restricted to 40 percent of the area median income, five units are restricted to 50 percent of the area median income, and the remaining 16 units are restricted to 60 percent of the area median income. The bank demonstrated a multifaceted approach by also providing $6 million in bridge financing.

- The bank made a $3.4 million investment in a multi-investor LIHTC fund to preserve a cultural landmark by converting it into affordable housing units.

Grand Rapids MSA AA

The institution had an excellent level of qualified investments, including grants, but not in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current and prior period investments represented 12.7 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community development needs. Investments were particularly responsive to affordable housing needs. The institution did not use innovative and/or complex investments to support CD initiatives. By dollar volume during the current period, 98.3 percent of total investments and grants supported affordable housing, 1.1 percent supported community services to low- and moderate-income individuals, and 0.6 percent promoted economic development. The following are examples of qualified investments that were responsive to the identified affordable housing needs in the AA:

- The bank made a $18.9 million investment in a multi-investor LIHTC fund for permanent supportive affordable housing. The bank demonstrated multifaceted support by also providing $10.8 million in financing.

- The bank made a $10.6 million investment in a multi-investor LIHTC fund to support the renovation of two buildings into 116 affordable housing units for individuals experiencing homelessness and those with special needs. Six units are restricted to 30 percent of the area median income, and the remaining 110 units are restricted to 60 percent of the area median income. All units include rental subsidies.

- The bank made a $1.3 million non-tax credit investment through a CDFI to support affordable housing. The bank demonstrated a multifaceted approach by also providing $12 million in working capital financing.

Broader Statewide or Regional Area

In addition, the bank made 14 investments totaling $642,572 in projects or organizations in the BSRA whose purpose, mandate, or function included serving the bank's AA. Of these, 11 investments were from the prior period with a remaining book value of $610,072. The BSRA investments supported the overall Investment Test rating.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Ann Arbor MSA AA, Bay City MSA AA, Flint MSA AA, Jackson MSA AA, Kalamazoo MSA AA, Lansing MSA AA, Muskegon MSA AA, Niles MSA AA, Saginaw MSA AA, Traverse City MSA AA, and MI non-MSA AA was consistent with the bank's overall performance under the Investment Test in the full-scope areas. Performance under the Investment Test in the Battle Creek MSA AA, Midland MSA AA, and Monroe MSA AA was weaker than the bank's overall performance under the Investment Test in the full-scope areas due to a lower level of investment. Performance in the limited-scope AAs had minimal impact on the overall state rating.

SERVICE TEST

The bank's performance under the Service Test in Michigan is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Detroit MSA AA and the Grand Rapids MSA AA was excellent.

Retail Banking Services

Table 5: Distribution of Branch Delivery Systems														2024
Assessment Area	Deposits	Branches							Population					
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography					
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA	
Detroit MSA	35.76	62	38.75	6.45	22.58	35.48	35.48	0.00	7.88	24.96	32.71	33.62	0.83	
Grand Rapids MSA	27.32	36	22.50	2.78	22.22	38.89	33.33	2.78	3.89	18.99	47.48	28.76	0.88	
Ann Arbor MSA	1.36	3	1.88	0.00	0.00	33.33	66.67	0.00	11.14	11.25	38.78	30.60	8.23	
Battle Creek MSA	1.16	1	0.63	100.00	0.00	0.00	0.00	0.00	5.48	29.99	38.16	26.36	0.00	
Bay City MSA	0.24	1	0.63	0.00	100.00	0.00	0.00	0.00	0.00	25.85	50.98	21.98	1.19	
Flint MSA	2.11	5	3.13	0.00	0.00	80.00	20.00	0.00	7.74	20.47	31.98	37.42	2.38	
Jackson MSA	0.45	1	0.63	0.00	0.00	100.00	0.00	0.00	4.10	27.55	38.59	25.16	4.59	
Kalamazoo MSA	5.54	6	3.75	0.00	33.33	33.33	33.33	0.00	6.27	21.54	37.55	33.32	1.32	
Lansing MSA	5.37	8	5.00	0.00	12.50	62.50	25.00	0.00	3.79	18.11	45.39	27.46	5.25	
Midland MSA	0.32	1	0.63	0.00	100.00	0.00	0.00	0.00	2.83	18.36	54.77	24.03	0.00	
Monroe MSA	1.72	3	1.88	0.00	33.33	33.33	33.33	0.00	3.53	11.92	60.85	23.70	0.00	
Muskegon MSA	2.64	4	2.50	0.00	25.00	75.00	0.00	0.00	10.06	15.07	49.45	25.43	0.00	
Niles MSA	3.40	7	4.38	14.29	14.29	42.86	28.57	0.00	9.06	15.62	42.80	31.46	1.06	
Saginaw MSA	0.50	1	0.63	0.00	0.00	100.00	0.00	0.00	5.17	25.87	31.46	37.51	0.00	
Traverse City MSA	3.53	4	2.50	0.00	25.00	50.00	25.00	0.00	0.00	11.30	59.09	29.62	0.00	
MI non-MSA	8.59	17	10.63	0.00	23.53	64.71	11.76	0.00	0.30	8.33	67.42	22.84	1.10	
Total	100.00	160	100.00	4.43	22.15	43.04	29.75	0.63	6.25	20.99	40.21	31.06	1.49	
Source: FFIEC File - 2024 Census														
1/1/2022 - 12/31/2024 Bank Data														
Due to rounding, totals may not equal 100.0%														

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

Detroit MSA AA

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income geographies was near to, and in moderate-income geographies approximated, the percentage of the population living within those geographies. Examiners further considered 11 middle- or upper-income adjacent branches that were within 1,000 feet of moderate-income geographies within the AA. These branches improved accessibility and had a positive impact on the retail Service Test conclusion.

The bank had several ADS including ATMs, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers and were positively considered in the service delivery systems conclusion. The bank had 78 ATMs in the AA, 76 of which were deposit-taking. Per data provided by the bank, as of the end of the evaluation period, bank customers located in low- and moderate-income geographies used online banking at a rate (45.3 percent) less than customers in middle- and upper-income geographies (49.5 percent), while mobile banking usage rates amongst customers in low- and moderate-income geographies (59.5 percent) were higher than that of customers in middle- and upper-income geographies (55.5 percent). During the evaluation

period, online banking usage increased 7.4 percent for customers located in low- and moderate-income geographies and 5 percent for customers in middle- and upper-income geographies. Mobile banking usage increased 5.3 percent for customers in low- and moderate-income geographies and 8 percent for customers in middle- and upper-income geographies.

Grand Rapids MSA AA

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income geographies was near to, and in moderate-income geographies exceeded, the percentage of the population living within those geographies. Examiners further considered two middle-income adjacent branches that were within 1,000 feet of low- or moderate-income geographies within the AA. These branches improved accessibility and had a positive impact on the retail Service Test conclusion.

The bank had several ADS including ATMs, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers and were positively considered in the service delivery systems conclusion. The bank had 72 ATMs in the AA, 64 of which were deposit-taking. Per data provided by the bank, as of the end of the evaluation period, bank customers located in low- and moderate-income geographies used online banking at a rate (42.7 percent) less than customers in middle- and upper-income geographies (51.1 percent), while mobile banking usage rates amongst customers in low- and moderate-income geographies (62.7 percent) were higher than that of customers in middle- and upper-income geographies (56.2 percent). During the evaluation period, online banking usage increased 9 percent for customers located in low- and moderate-income geographies and 4.6 percent for customers in middle- and upper-income geographies. Mobile banking usage increased 5.8 percent for customers in low- and moderate-income geographies and 11.1 percent for customers in middle- and upper-income geographies.

Table 6: Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Detroit MSA	0	2	0	-1	-1	0	0
Grand Rapids MSA	0	6	0	-3	-2	-1	0
Ann Arbor MSA	0	0	0	0	0	0	0
Battle Creek MSA	0	0	0	0	0	0	0
Bay City MSA	0	0	0	0	0	0	0
Flint MSA	0	2	0	-1	-1	0	0
Jackson MSA	0	0	0	0	0	0	0
Kalamazoo MSA	0	2	0	0	-2	0	0
Lansing MSA	0	1	0	-1	0	0	0
Midland MSA	0	0	0	0	0	0	0
Monroe MSA	0	0	0	0	0	0	0
Muskegon MSA	0	1	0	0	0	-1	0
Niles MSA	0	0	0	0	0	0	0
Saginaw MSA	0	0	0	0	0	0	0
Traverse City MSA	0	0	0	0	0	0	0
MI non-MSA	0	1	0	0	-1	0	0
Total	0	15	0	-6	-7	-2	0
1/1/2022 - 12/31/2024 Bank Data.							

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

Detroit MSA AA

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, the bank closed two branches, none of which were in low-income geographies and one of which was in a moderate-income geography. The branch closures were a result of low productivity and branch consolidation. The bank did not open branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly low- and moderate-income geographies and/or individuals. The bank maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. Average hours of operation were comparable between the low- and moderate-income branches and the middle- and upper-income branches. There were 61 AA branches with the same lobby hours of 9:00 a.m. to 5:00 p.m. Monday through Thursday, and 9:00 a.m. to 6:00 p.m. on Friday. In addition, there is one branch located in a community center in a moderate-income area of Detroit that has lobby hours of 10:00 a.m. to 4:00 p.m. Monday through Thursday. Of the 62 branches in the AA, 50 were open from either 9:00 a.m. to 12:00 p.m. or 9:00 a.m. to 1:00 p.m. on Saturdays, including two of the four low-income branches and 11 of the 14 moderate-income branches. There were 60 locations with drive-thru facilities, including all four branches in low-income geographies and 13 of 14 branches in moderate-income geographies.

Grand Rapids MSA AA

To the extent changes have been made, the institution's opening and closing of branches has adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, the bank closed six branches, none of which were in low-income geographies and three of which were in moderate-income geographies. The branch closures were a result of low productivity and branch consolidation. The bank did not open any branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly low- and moderate-income geographies and/or individuals. The bank maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. Average hours of operation were comparable between the low- and moderate-income branches and the middle- and upper-income branches. There were 35 AA branches with the same lobby hours of 9:00 a.m. to 5:00 p.m. Monday through Thursday. The majority of AA branches (24), including six of the eight moderate-income branches, were open from 9:00 a.m. to 5:30 p.m. on Friday. In addition, there is one branch in an upper-income geography open from 9:00 a.m. to 5:15 p.m. Monday through Friday. Of the 36 branches in the AA, 33 had Saturday hours from 9:00 a.m. to 12:00 p.m. The one branch in a low-income geography was not open on Saturday, while all eight moderate-income branches were open on Saturday. There were 34 locations with drive-thru facilities, including all nine branches in low- and moderate- income geographies.

Community Development Services

Detroit MSA AA

The institution was a leader in providing CD services. During the evaluation period, bank employees provided 5,631 hours of qualified CD service activities to 13 organizations within this AA. Leadership is evident through board or committee participation, with five employees providing 57 service hours. Additionally, the bank hosted 58 eBus events in the Detroit MSA benefiting 7,832 individuals. The bank's assistance was responsive to identified needs in the AA, particularly with technical assistance to small businesses and financial education.
Service activity examples during the evaluation period include:

- The bank partnered with a nonprofit financial literacy empowerment organization during the evaluation period to provide over 5,400 hours of financial education that reached over 1,200 low- and moderate-income individuals.

- A bank employee worked with a CDFI providing 80 hours of technical assistance to women small business owners, many of whom do not qualify for traditional bank financing. The technical assistance focused on business plan development, fiscal management training and other financial literacy.

- The bank hosted four eBus events during the review period in partnership with an area affordable housing agency that provides housing assistance resources and works to prevent homelessness. During the events, bank employees provided financial education on topics including homebuyer education, saving and budgeting, understanding credit reports, and identity theft protection.

Grand Rapids MSA AA

The institution provided a relatively high level of CD services. During the evaluation period, bank employees provided 996 hours of qualified CD service activities to 45 organizations within this AA. Leadership is evident through board or committee participation, with 18 employees providing 536 service hours. Additionally, the bank hosted eight eBus events in the Grand Rapids MSA benefiting 1,055 individuals. The bank's assistance was responsive to identified needs in the AA, particularly with financial education. Service activity examples during the evaluation period include:

- Bank employees hosted 61 low- and moderate-income students from two area high schools for a Day at the Bank event that included financial literacy education covering topics such as budgeting and how interest works. Through this event, employees provided 130 service hours.

- A bank employee provided over 200 hours during the evaluation period serving on the board of an area nonprofit economic development organization.

- A bank employee provided 38 hours of tax preparation assistance in partnership with the local chapter of a nationwide nonprofit that works to reduce poverty and strengthen communities.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's retail service delivery systems performance under the Service Test in the Niles MSA AA and the MI non-MSA AA was consistent with the bank's overall retail service delivery systems performance in the full-scope areas. The bank's retail service delivery systems performance in the Ann Arbor MSA, Battle Creek MSA, Bay City MSA, Flint MSA, Jackson MSA, Kalamazoo MSA, Lansing MSA, Midland MSA, Monroe MSA, Muskegon MSA, Saginaw MSA, and Traverse City MSA AAs was weaker than the bank's overall retail service delivery systems performance under the Service Test in the full-scope areas due to weaker branch distributions. Performance differences in the limited-scope AAs had minimal impact on the overall state rating.

State of North Carolina

CRA rating for the State of North Carolina: Outstanding
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments and grants which were responsive in addressing community needs.
- Service delivery systems were overall readily accessible to geographies and individuals of different income levels in the institution's AAs with consideration for middle- and upper-income adjacent and proximate branches and ADS.
- The bank provided an overall adequate level of CD services. CD services were responsive in addressing community needs.

Description of Institution's Operations in North Carolina

The state of North Carolina consists of six AAs. They include portions of the Asheville, NC MSA (Asheville MSA),the Charlotte-Concord-Gastonia, NC-SC MSA (Charlotte MSA), the Durham-Chapel Hill, NC MSA (Durham MSA), the Hickory-Lenoir-Morganton, NC MSA (Hickory MSA), and the Raleigh-Cary, NC MSA (Raleigh MSA), and six nonmetropolitan counties comprising the North Carolina non-MSA (NC non-MSA) AA. Examiners combined the nonmetropolitan counties into one AA for analysis and presentation. Refer to the table in appendix A for a list of counties reviewed.

As of year-end 2024, the bank operated 81 branches and 89 deposit-taking ATMs in this rating area. The bank had nearly $2 billion in adjusted deposits in this rating area, which represented 1.2 percent of the bank's total adjusted deposits. This rating area was the bank's 12th largest in terms of deposits held. During the evaluation period, the bank made $1.3 billion or 5 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked eighth out of 51 FDIC-insured depository institutions with a 1.6 percent deposit market share in this rating area. The top three competitors had 69.5 percent of the market share and included First-Citizens Bank & Trust Company with 45 branches and 48.2 percent deposit market share, Wells Fargo Bank, N.A. with 66 branches and 10.7 percent deposit market share, and Truist Bank with 58 branches and 10.6 percent deposit market share.

Charlotte MSA AA

The following table provides a summary of the demographics, including housing and business information, for the Charlotte MSA AA.

Assessment Area - FS - 2022-2023 Charlotte MSA						
						2022 - 2023
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	495	5.05	27.47	29.70	36.16	1.62
Population by Geography	1,999,931	3.99	27.21	31.94	36.18	0.68
Housing Units by Geography	793,577	4.26	28.63	31.18	34.97	0.96
Owner-Occupied Housing by Geography	467,851	1.92	24.37	32.90	40.52	0.29
Occupied Rental Units by Geography	260,865	8.08	35.36	28.59	26.09	1.88
Vacant Units by Geography	64,861	5.78	32.28	29.26	30.59	2.09
Businesses by Geography	112,372	4.21	25.09	27.66	41.28	1.75
Farms by Geography	3,264	2.63	26.16	38.30	32.44	0.46
Family Distribution by Income Level	481,907	20.76	17.39	19.38	42.47	0.00
Household Distribution by Income Level	728,716	21.81	16.71	17.91	43.57	0.00
Unemployment rate (%)	4.91	8.15	6.69	4.55	3.66	1.21
Households Below Poverty Level (%)	10.05	26.76	15.57	8.59	4.78	18.34
Median Family Income (16740 - Charlotte-Concord-Gastonia, NC-SC MSA)		$80,486			Median Housing Value	$213,500
Median Family Income (16740 - Charlotte-Concord-Gastonia, NC-SC MSA) for 2023		$98,700			Median Gross Rent	$1,129
					Families Below Poverty Level	7.80
FFIEC File - 2020 Census						
2023 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

The Charlotte MSA AA consisted of Cabarrus, Iredell, Lincoln, Mecklenburg, Rowan, and Union counties in North Carolina.

Based on the June 30, 2023, FDIC Summary of Deposit Market Share Report, the bank ranked fourth out of 41 FDIC-insured depository institutions with a 1.3 percent deposit market share in this AA. The top three competitors had 94.2 percent of the market share and included Bank of America, N.A. with 39 branches and 63.2 percent deposit market share, Truist Bank with 52

branches and 21.1 percent deposit market share, and Wells Fargo Bank, N.A. with 60 branches and 9.9 percent deposit market share.

In the performance context, examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be $1,146. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Based on the 2023 median family income, the calculated maximum affordable monthly mortgage payment was $1,234 for a low-income borrower and $1,974 for a moderate-income borrower. Based on these calculations, housing was affordable for both low- and moderate-income borrowers. Community contacts (see below) noted affordable housing continues to be a community need despite these calculations.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For this AA, 7.8 percent of families were living below the poverty level.

Economic Data

Data from the November 2024 Moody's Analytics report indicates the Charlotte metro economy is in the late expansion part of the business cycle. Payroll growth is higher than the state and nation. Healthcare, leisure/hospitality, and public sector jobs are driving this growth, offsetting weaknesses in transportation/warehousing and manufacturing. Although unemployment increased slightly in 2024 it remains below the state and national average. The Charlotte metro is a banking hub, with financial services payrolls that place it fourth among the top 25 largest metro areas and divisions. Additionally, although healthcare employment is over 12 percent higher than the pre-pandemic peak, it has not kept pace with robust population gains. Major employers include Atrium Health, Wells Fargo & Co., Bank of America Corp., American Airlines Group, and Novant Health Inc. House prices modestly appreciated, more so than the state and national average, and single-family building permits recovered in the latter part of 2024. Area strengths include an increasing tech presence that attracts new workers and investment, favorable demographic trends including strong net migration, and low business costs coupled with a highly skilled workforce. Weaknesses include the overvaluing of single-family housing stock as well as a leveling-off of new building.

According to the BLS, the non-seasonally adjusted unemployment rate for the Charlotte MSA was 4 percent as of January 2022 and decreased to 3.3 percent as of December 2023. The national unemployment rate was 3.5 percent as of December 2023.

Community Contacts

Examiners relied on information from one community contact completed during the evaluation period. The organization focused on affordable housing and indicated the most prevalent need

was affordable housing as low- and moderate-income individuals tend to struggle in current economic conditions, especially as home and rental prices increase. The contact also discussed the high level of homelessness and the need for housing and community services for these individuals. The contact identified the following needs and opportunities within the community:

- Funding for affordable housing initiatives
- Supportive housing solutions that account for both affordability and social services
- Policy and funding advocacy to address systemic gaps in housing and social services
- Community outreach and engagement with unhoused populations to connect them with resources
- Expanded housing assistance programs to serve those who don't qualify for traditional homeownership models

Raleigh MSA AA

The following table provides a summary of the demographics, including housing and business information, for the Raleigh MSA AA.

Assessment Area - FS - Raleigh MSA						
						2022 - 2024
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	230	6.52	16.96	33.48	40.00	3.04
Population by Geography	1,129,410	6.12	16.49	35.33	40.11	1.94
Housing Units by Geography	441,720	6.16	17.18	35.83	39.20	1.62
Owner-Occupied Housing by Geography	262,278	2.99	14.83	36.18	44.71	1.30
Occupied Rental Units by Geography	148,274	11.24	21.35	35.33	29.93	2.15
Vacant Units by Geography	31,168	8.72	17.14	35.25	37.02	1.88
Businesses by Geography	75,409	4.91	15.53	35.38	43.00	1.17
Farms by Geography	2,035	4.13	13.71	40.34	40.15	1.67
Family Distribution by Income Level	270,784	19.49	15.74	20.37	44.40	0.00
Household Distribution by Income Level	410,552	21.27	16.27	17.92	44.55	0.00
Unemployment rate (%)	4.18	8.52	4.79	4.26	3.28	1.75
Households Below Poverty Level (%)	7.53	17.69	10.33	6.81	4.55	28.73
Median Family Income (39580 - Raleigh-Cary, NC MSA)		$96,929			**Median Housing Value**	$288,500
Median Family Income (39580 - Raleigh-Cary, NC MSA) for 2024		$122,300			**Median Gross Rent**	$1,198
					Families Below Poverty Level	5.44
FFIEC File - 2020 Census						
FFIEC File - 2024 Census 2024 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

The Raleigh MSA AA consisted of Wake County. As of year-end 2024, the bank operated 23 branches and 23 deposit-taking ATMs in this AA.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, the bank ranked 10th out of 35 FDIC-insured depository institutions with a 1 percent deposit market share in this AA. The top three competitors had 79.1 percent of the market share and included First-Citizens Bank & Trust Company with 19 branches and 62.2 percent deposit market share, Wells Fargo Bank, N.A. with 33 branches and 9 percent deposit market share, and Truist Bank with 28 branches and 8 percent deposit market share.

In the performance context, examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be $1,549. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Based on the 2024 median family income, the calculated maximum affordable monthly mortgage payment was $1,529 for a low-income borrower and $2,446 for a moderate-income borrower. Based on these calculations, housing was affordable for moderate-income borrowers, but low-income borrowers would be challenged to qualify for and afford home mortgage financing in this AA.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For this AA, 5.4 percent of families were living below the poverty level.

Economic Data

Data from the August 2024 Moody's Analytics report indicates the Raleigh economy is performing well. Raleigh's robust economy is driven by tech, manufacturing, and a steady talent pipeline from North Carolina State University. Virtually all industries are expanding in the area, led by construction and healthcare. Nonfarm payroll growth is nearly double the national rate. Factory payrolls since 2020 were quadruple the national gain. The unemployment rate edged higher but is far below state and national averages. Major employers include WakeMed Health & Hospitals, North Carolina State University, IBM Corp., UNC Rex Healthcare, and Cisco Systems. House price appreciation continues to slow, with single-family housing permits increasing the housing supply. Area strengths include low business and living costs compared to other tech hubs, high per capita income that supports consumption, strong and improving net migration, high economic vitality, and high concentration of prime-age workers. Weaknesses include a strained infrastructure and high employment volatility.

According to the BLS, the non-seasonally adjusted unemployment rate for the Raleigh MSA was 3.4 percent as of January 2022 and decreased to 2.8 percent as of December 2024. The national unemployment rate was 3.9 percent as of December 2024.

Community Contacts

Examiners relied on information from three community contacts completed during the evaluation period. The organizations contacted included a women's business center, a small business development coordinator, and a nonprofit organization that focuses on housing, transportation, and the economy. A key challenge identified was access to capital for underserved communities, technical assistance, and business education. The contacts identified the following needs and opportunities within the community:

- Affordable housing developments
- Debt capital, such as Equity Equivalent (EQ2) investments, that provide funding for crucial community needs, support lending activities, and expand capital
- Technical assistance, educational programs, and workshops for small businesses
- Volunteering on board or advisory committees to provide expertise and strategic guidance
- Participation and funding for an affordable housing preservation and gap fund
- Access to capital and down payment assistance and short-term capital that exists outside of payday lenders
- Support for infrastructure and transit projects
- Flexible financing for affordable alternative housing types such as tiny homes

Scope of Evaluation in North Carolina

Examiners selected two AAs for full-scope reviews. Examiners conducted a full-scope review of the Charlotte MSA AA for 2022-2023 and the Raleigh MSA AA. The Charlotte MSA AA was the largest AA in the state of North Carolina in terms of deposits, branches, and lending activity until the bank opened a branch in Lancaster County, South Carolina, creating the Charlotte MMSA AA for 2024. As of 2024, the Raleigh MSA AA was the largest AA in terms of deposits, branches, and lending activity in the state of North Carolina. The Asheville MSA, Durham MSA, Hickory MSA, and NC non-MSA AAs received limited-scope reviews. Refer to the table in appendix A for more information.

Examiners based their ratings primarily on the results of the areas that received the full-scope reviews and the bank's performance in the limited-scope areas, as applicable. The Charlotte MSA AA was the most heavily weighted when arriving at the overall conclusion for the state of North Carolina.

Examiners placed more emphasis on home mortgage loans than small loans to businesses in arriving at the overall conclusion for all AAs in the rating area as they represented the majority of lending in all AAs. The bank originated or purchased too few small loans to farms in all AAs in this rating area to conduct a meaningful analysis.

On September 26, 2023, FTB opened a branch in Lancaster County, South Carolina, which created the Charlotte MMSA AA. Prior to this branch opening, FTB operated only in the North Carolina portion of the MSA. An analysis of the Charlotte MSA AA for 2022-2023 is included in the state of North Carolina. As of 2024, the analysis was completed under the MMSA. Therefore, tables reporting the percent of deposits for each AA will reflect "NA", not applicable,

for this AA under the State of North Carolina but will be reflected in the Charlotte MMSA AA tables. The Investment Test for the Charlotte MSA AA does not consider prior period investments, as they are considered as part of the Charlotte MMSA AA which covers the 2024 period. Additionally, for the Charlotte MSA AA, examiners considered deposits as of June 30, 2023, and tier 1 capital as of December 31, 2023.

On November 5, 2024, FTB opened a branch in New Hanover County, which is located within the Wilmington, NC MSA (Wilmington MSA), creating the Wilmington MSA AA. This AA will not be included in the evaluation because the bank entered this county and AA less than six months before the end of the evaluation period, and the analysis would not be meaningful.

Bank delineated AAs located in the same MSA are combined, analyzed, and presented as one AA for purposes of this evaluation. Similarly, bank delineated non-MSA AAs within the same state are combined, analyzed, and presented as one AA for purposes of this evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NORTH CAROLINA

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Charlotte MSA AA and the Raleigh MSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Table 3: Lending Activity								2022 - 2024
Number of Loans								
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Consumer**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Charlotte MSA**	2,516	785	10	21	-	3,332	58.30	NA
Raleigh MSA	1,186	177	1	22	-	1,386	24.25	47.62
Asheville MSA	99	24	1	0	-	124	2.17	6.94
Durham MSA	244	37	0	1	-	282	4.93	16.77
Hickory MSA	139	38	0	0	-	177	3.10	5.99
NC non-MSA	341	71	1	1	-	414	7.24	22.67
Broader Statewide or Regional Area	0	0	0	0	-	0	NA	NA
Total	**4,525**	**1,132**	**13**	**45**	**-**	**5,715**	**100.00**	**100.00**
Dollar Volume of Loans ($000s)								
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Consumer**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Charlotte MSA	523,196	108,763	1,021	162,015	-	794,995	48.42	NA
Raleigh MSA	457,655	33,154	13	119,527	-	610,349	37.17	47.62
Asheville MSA	32,050	3,909	26	0	-	35,985	2.19	6.94
Durham MSA	82,876	5,899	0	12,000	-	100,775	6.14	16.77
Hickory MSA	28,004	7,855	0	0	-	35,859	2.18	5.99
NC non-MSA	53,318	5,585	2	5,000	-	63,905	3.89	22.67
Broader Statewide or Regional Area	0	0	0	0	-	0	NA	NA
Total	**1,177,099**	**165,165**	**1,062**	**298,542**	**-**	**1,641,868**	**100.00**	**100.00**
Source: 1/1/2022 - 12/31/2024 Bank Data.								
Due to rounding, totals may not equal 100.0%								

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.
**Lending activity represented in this table includes only 2022-2023 data for the Charlotte MSA AA.

Charlotte MSA AA (2022-2023)

Lending levels reflected excellent responsiveness to AA credit needs.

Based on the June 30, 2023, FDIC Summary of Deposit Market Share Report, FTB ranked fourth out of 41 FDIC-insured depository institutions (top 10 percent) with a 1.3 percent deposit market share.

For home mortgage loans, the bank's market share of 1.5 percent ranked 16th out of 743 lenders (top 3 percent). The top three lenders were State Employees' Credit Union with 6.7 percent

market share, Rocket Mortgage with 4.9 percent market share, and Bank of America with 4.2 percent market share.

For small loans to businesses, the bank's market share of 0.6 percent ranked 18th out of 168 lenders (top 11 percent). The top three lenders were American Express National Bank with 25.4 percent market share, JPMorgan Chase Bank, N.A. with 13.3 percent market share, and Bank of America, N.A. with 12.3 percent market share. The top small business lenders were institutions with large business credit card portfolios with average loan sizes of $22,000 or less. FTB's average small business loan size was $144,000.

Raleigh MSA AA

Lending levels reflected excellent responsiveness to AA credit needs.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked 10th out of 35 FDIC-insured depository institutions (top 29 percent) with a 1 percent deposit market share.

For home mortgage loans, the bank's market share of 0.7 percent ranked 31st out of 597 lenders (top 6 percent). The top three lenders were State Employees' Credit Union with 13 percent market share, Coastal Federal Credit Union with 5.7 percent market share, and Pennymac Loan Services, LLC with 4.3 percent market share.

For small loans to businesses, the bank's market share of 0.2 percent ranked 32nd out of 140 lenders (top 23 percent). The top three lenders were American Express National Bank with 27.4 percent market share, JPMorgan Chase Bank, N.A. with 20.2 percent market share, and Bank of America, N.A. with 9.9 percent market share. The top small business lenders were institutions with large business credit card portfolios with average loan sizes of $18,000 or less. FTB's average small business loan size was $132,000.

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AAs. The geographic distribution of home mortgage loans was adequate and the geographic distribution of small loans to businesses was good.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans was adequate. The geographic distribution of loans in the Charlotte MSA AA was adequate and the geographic distribution of loans in the Raleigh MSA AA was excellent.

Charlotte MSA AA (2022-2023)

The geographic distribution of home mortgage loans was adequate. The percentage of home mortgage loans originated or purchased in low-income geographies was below the percentage of owner-occupied housing units located in those geographies and was well below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies was below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

Raleigh MSA AA

The geographic distribution of home mortgage loans was excellent. The percentage of home mortgage loans originated or purchased in low-income geographies exceeded both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies exceeded both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was good. The geographic distribution of loans in the Charlotte MSA AA was good and the geographic distribution of loans in the Raleigh MSA AA was excellent.

Charlotte MSA AA (2022-2023)

The geographic distribution of small loans to businesses was good. The percentage of small loans to businesses originated or purchased in low-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies was below the percentage of businesses located in those geographies but was near to the aggregate percentage of all reporting lenders.

Raleigh MSA AA

The geographic distribution of small loans to businesses was excellent. The percentage of small loans to businesses originated or purchased in low-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies approximated both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AAs. Examiners did not identify any unexplained conspicuous gaps in the full-scope AAs reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution. The distribution of home mortgage loans was excellent, and the distribution of small business loans was good.

Home Mortgage Loans

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

The distribution of home mortgage loans among individuals of different income levels was excellent. The distribution of loans in both the Charlotte MSA AA and the Raleigh MSA AA was excellent.

Charlotte MSA AA (2022-2023)

The distribution of home mortgage loans among individuals of different income levels was excellent. The percentage of home mortgage loans originated or purchased to low-income borrowers was below the percentage of those families in the AA but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate percentage of all reporting lenders.

Raleigh MSA AA

The distribution of home mortgage loans among individuals of different income levels was excellent. Consideration was given to the affordability of housing for low-income borrowers when reaching the overall conclusion. Based on housing affordability calculations, housing was not affordable for low-income borrowers in the AA; therefore, more emphasis was placed on the aggregate comparator.

The percentage of home mortgage loans originated or purchased to low-income borrowers was well below the percentage of those families in the AA but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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

The distribution of loans to businesses of different sizes was good. This distribution of loans in both the Charlotte MSA AA and the Raleigh MSA AA was good.

Charlotte MSA AA (2022-2023)

The distribution of loans to businesses of different sizes was good. The percentage of loans to small businesses originated or purchased was below the percentage of small businesses in the AA but exceeded the aggregate percentage of all reporting lenders.

Raleigh MSA AA

The distribution of loans to businesses of different sizes was good. The percentage of loans to small businesses originated or purchased was below the percentage of small businesses in the AA but exceeded the aggregate percentage of all reporting lenders.

Community Development Lending

The institution was a leader in making CD loans.

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

Charlotte MSA AA (2022-2023)

The level of CD lending was excellent. CD lending had a positive impact on the Lending Test conclusion. During the evaluation period, FTB originated 21 CD loans totaling $162 million or 29.3 percent of allocated tier 1 capital as of December 31, 2023. By dollar volume, 49.3 percent funded economic development, 41.4 percent funded affordable housing, and 9.3 percent funded community services. CD loans were responsive to identified community needs including affordable housing. The following are examples of CD loans the bank originated or purchased in the AA:

- A $19.5 million loan to construct a senior LIHTC housing project in the historic West End. The project was the first land trust/equity project on the West Boulevard, and it spurred additional private and public support in the neighborhood.

- A $10 million working capital loan to a university that offers a curriculum to a variety of students of socioeconomic and geographic backgrounds. The university's student population

is reliant on federal financial aid and 68 percent of the students receive a Pell grant. The bank's financing bridges gaps caused by any delays in financial aid.

Raleigh MSA AA

The level of CD lending was excellent, which further supported the Lending Test conclusion. During the evaluation period, FTB originated 22 CD loans totaling $119.5 million or 99.3 percent of allocated tier 1 capital. By dollar volume, 75.1 percent funded economic development, 24.7 percent funded affordable housing, and 0.2 percent funded community services. CD loans were responsive to identified community needs including affordable housing. The following are examples of CD loans the bank originated or purchased in the AA:

- A $29.5 million loan for a 144-unit multi-family LIHTC project, with all units restricted to households with income levels below 80 percent of the area median income.

- A $250,000 line of credit to an organization that provides a variety of community services to primarily low- and moderate-income families. Some of the community services provided include family safety, mental health therapy and treatment, and housing assistance. The loans allowed the organization to meet the timing difference of funding to ensure the continuation of services.

- A $30 million line of credit to a Small Business Investment Company, of which, $4.3 million benefited the Raleigh MSA AA. The private equity firm partners with management teams to grow companies in manufacturing, distribution, healthcare, and business services.

Product Innovation and Flexibility

The institution used innovative and/or flexible lending practices in order to serve AA credit needs. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for details regarding the programs offered.

Charlotte MSA AA (2022-2023)

The institution used innovative and/or flexible lending practices in order to serve AA credit needs. The bank originated or purchased 336 loans under its flexible lending programs totaling $43.9 million.

Raleigh MSA AA

The institution used innovative and/or flexible lending practices in order to serve AA credit needs. As shown in the table below, the bank originated or purchased 192 loans under its flexible lending programs totaling $49.3 million.

Conclusions for Areas Receiving Limited-Scope Reviews

Refer to Tables 7 through 10 in the state of North Carolina section of appendix D for the facts and data that support the limited-scope conclusions.

Based on limited-scope reviews, the bank's performance under the Lending Test in the Durham MSA AA and NC non-MSA AA was consistent with the bank's overall performance under the Lending Test in the full-scope areas. The bank's performance under the Lending Test in the Asheville MSA AA and Hickory MSA AA was weaker than the bank's overall performance under the Lending Test in the full-scope areas. The weaker performance in the Asheville MSA AA and Hickory MSA AA was due to weaker borrower distribution and the lack of CD lending. Performance in the limited-scope AAs had a minimal impact on the overall state rating.

INVESTMENT TEST

The bank's performance under the Investment Test in North Carolina is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in both the Charlotte MSA AA and the Raleigh MSA AA was excellent.

Table 4: Qualified Investments*

Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Charlotte MSA	0	0	37	25,819	37	46.84	25,819	27.96	0	0
Raleigh MSA	9	31,933	12	11,125	21	26.58	43,058	46.63	0	0
Asheville MSA	3	91	2	505	5	6.33	596	0.65	0	0
Durham MSA	1	12	4	8,892	5	6.33	8,904	9.64	0	0
Hickory MSA	1	1,353	1	10	2	2.53	1,363	1.48	0	0
NC non-MSA	2	1,308	2	8,945	4	5.06	10,253	11.10	0	0
Broader Statewide or Regional Area	4	2,301	1	40	5	6.33	2,341	2.54	0	0
Total	20	36,998	59	55,336	79	100.00	92,334	100.00	0	0

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

Charlotte MSA AA (2022-2023)

The institution had an excellent level of qualified investments, including grants, but not in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current period investments (January 1, 2022, through December 31, 2023) represented 4.7 percent of allocated tier 1 capital as of December 31, 2023.

The institution exhibited excellent responsiveness to credit and community development needs. Investments were particularly responsive to affordable housing needs. The institution did not use

innovative and/or complex investments to support CD initiatives. By dollar volume during the current period, 74.8 percent of total investments and grants supported affordable housing, 20.2 percent promoted economic development, 3.3 percent funded revitalization and stabilization efforts, and 1.8 percent supported community services to low- and moderate-income individuals. The following are examples of qualified investments in the AA:

- The bank made a $15.4 million investment in a multi-investor LIHTC fund for 120 units of affordable housing for seniors, where 27 units are restricted to 30 percent of the area median income, 71 units are restricted to 60 percent of the area median income, and the remaining 22 units are restricted to 80 percent of the area median income.

- The bank made a $3.5 million investment in a multi-investor LIHTC fund for affordable housing units.

- The bank made a $212,000 grant to support small business development, home repairs for low-income seniors, and capacity building for organizations providing affordable housing to low- and moderate-income individuals and small businesses.

Raleigh MSA AA

The institution had an excellent level of qualified investments, including grants, but not in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current and prior period investments represented 35.8 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community development needs. Investments were particularly responsive to affordable housing needs. The institution did not use innovative and/or complex investments to support CD initiatives. By dollar volume during the current period, 99.1 percent of total investments and grants supported affordable housing, 0.7 percent supported community services to low- and moderate-income individuals, and 0.2 percent promoted economic development. The following are examples of qualified investments in the AA:

- The bank made an $11 million investment in a multi-investor LIHTC fund for the construction of an affordable housing development comprised of 144 units. The investment responded to a community-identified need for affordable housing. Further, the bank demonstrated a multifaceted approach by also providing $29.5 million in bridge financing.

- There were nine complex and responsive investments made by the bank prior to 2022 which had a remaining book value of $31.9 million. All nine were LIHTC investments for affordable housing.

Broader Statewide or Regional Area

In addition, the bank made five investments totaling $2.3 million in projects or organizations in the BSRA whose purpose, mandate, or function included serving the bank's AA. Of these, four

investments were from the prior period with a remaining book value of $2.3 million. The BSRA investments supported the overall Investment Test conclusion.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Durham MSA AA, Hickory MSA AA, and NC non-MSA AA was consistent with the bank's overall performance under the Investment Test in the full-scope areas. Performance under the Investment Test in the Asheville MSA AA was weaker than the bank's overall performance under the Investment Test in the full-scope areas due to a lower level of investment. Performance in the limited-scope AAs had minimal impact on the overall state rating.

SERVICE TEST

The bank's performance under the Service Test in North Carolina is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Charlotte MSA AA (2022-2023) was excellent and in the Raleigh MSA AA was adequate.

Retail Banking Services

Table 5: Distribution of Branch Delivery Systems													2024
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Charlotte MSA	NA	45	55.56	4.44	24.44	17.78	53.33	0.00	3.99	27.21	31.94	36.18	0.68
Raleigh MSA	47.62	23	28.40	4.35	4.35	30.43	60.87	0.00	6.12	16.49	35.33	40.11	1.94
Asheville MSA	6.94	1	1.23	0.00	0.00	100.00	0.00	0.00	1.70	20.37	53.08	24.85	0.00
Durham MSA	16.77	5	6.17	0.00	0.00	80.00	20.00	0.00	12.31	16.33	33.56	35.54	2.27
Hickory MSA	5.99	1	1.23	0.00	0.00	100.00	0.00	0.00	0.00	13.76	52.34	33.91	0.00
NC non-MSA	22.67	6	7.41	16.67	16.67	50.00	16.67	0.00	1.40	18.47	67.07	13.07	0.00
Total	100.00	81	100.00	4.94	16.05	29.63	49.38	0.00	5.11	21.78	37.14	34.80	1.16
Source: FFIEC File - 2024 Census *1/1/2022 - 12/31/2024 Bank Data* *Due to rounding, totals may not equal 100.0%*													

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

Charlotte MSA AA (2022-2023)

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income geographies exceeded, and in moderate-income geographies approximated, the percentage of the population living within those geographies.

The bank had several ADS including ATMs, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers and were positively considered in the service delivery systems conclusion. As of year-end 2023, the bank had 53 ATMs in the AA, 50 of which were deposit-taking. Per data provided by the bank, as of the fourth quarter of 2021, bank customers located in low- and moderate-income geographies used online banking at a rate (38.9 percent) less than customers in middle- and upper-income geographies (48.2 percent), while mobile banking usage rates amongst customers in low- and moderate-income geographies (54.8 percent) were comparable to that of customers in middle- and upper-income geographies (54.3 percent). The OCC did not consider usage rate trends for this AA given that it did not exist in 2024.

Raleigh MSA AA

Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income geographies was near to, and in moderate-income geographies was well below, the percentage of the population living within those geographies. Examiners considered three middle- or upper-income adjacent branches that were within 1,000 feet of moderate-income geographies within the AA. Additionally, the OCC considered six middle- or upper-income branches that were in close proximity to low- or moderate-income geographies and served customers residing in those areas as demonstrated by bank customer usage data. Of the six proximate branches, three served low-income geographies and three served moderate-income geographies. These branches improved accessibility and had a positive impact on the retail Service Test conclusion.

The bank had several ADS including ATMs, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers and were positively considered in the service delivery systems conclusion. The bank had 23 ATMs in the AA, all of which were deposit-taking. Per data provided by the bank, as of the end of the evaluation period, bank customers located in low- and moderate-income geographies used online banking at a rate (42.2 percent) less than customers in middle- and upper-income geographies (46.7 percent), while mobile banking usage rates amongst customers in low- and moderate-income geographies (65.2 percent) were higher than that of customers in middle- and upper-income geographies (57.8 percent). During the evaluation period, online banking usage decreased 0.2 percent for customers located in low- and moderate-income geographies and increased 2.4 percent for customers in middle- and upper-income geographies. Mobile banking usage increased 21.2 percent for low- and moderate-income customers and 19.7 percent for customers in middle- and upper-income geographies.

Table 6: Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Charlotte MSA	1	4	0	0	-2	-1	0
Raleigh MSA	10	1	0	0	4	5	0
Asheville MSA	0	0	0	0	0	0	0
Durham MSA	2	0	0	0	2	0	0
Hickory MSA	0	0	0	0	0	0	0
NC non-MSA	0	0	0	0	0	0	0
Total	13	5	0	0	4	4	0
1/1/2022 - 12/31/2024 Bank Data.							

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

Charlotte MSA AA (2022-2023)

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During 2022-2023, the bank closed four branches, none of which were in low-income geographies and one of which was in a moderate-income geography. Two of the branch closures were a result of low productivity and branch customer overlap, one was due to persistent flooding issues at the branch location, and one branch was consolidated with another nearby branch due to its limited visibility. The bank also opened one branch in a moderate-income geography during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly low- and moderate-income geographies and/or individuals. The bank maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. Average hours of operation for branches in low- and moderate-income geographies were comparable to those branches in middle- and upper-income geographies. All branches had the same lobby hours of 9:00 a.m. to 5:00 p.m. Monday through Thursday, and 9:00 a.m. to 6:00 p.m. on Fridays except for one upper-income branch that was only open until 5:30 p.m. on Fridays. Of the 45 branches in the AA, 37 were open from 9:00 a.m. to 1:00 p.m. on Saturdays, including both low-income branches and 10 of the 11 moderate-income branches. There were 35 locations with drive-thru facilities, of which two were in low-income geographies and ten were in moderate-income geographies.

Raleigh MSA AA

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, the bank closed one middle-income branch. The branch closure was a result of the lease expiring on the building coupled with low productivity at the branch. The bank also opened ten branches during the evaluation period, none of which were in low- or moderate-income geographies.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly low- and moderate-income geographies and/or individuals. The bank maintained standard business hours and offered traditional banking products and services at all 23 branch locations in the AA. Average hours of operation for branches in low- and moderate-income geographies were comparable to those branches in middle- and upper-income geographies. All branches had the same lobby hours of 9:00 a.m. to 5:00 p.m. Monday through Thursday, and 9:00 a.m. to 6:00 p.m. on Friday. All AA branches, except for one upper-income branch, were open from 9:00 a.m. to 1:00 p.m. on Saturdays. There were 22 locations with drive-thru facilities, including the two branches in low- and moderate-income geographies.

Community Development Services

Charlotte MSA AA (2022-2023)

The institution provided a relatively high level of CD services. During 2022-2023, bank employees provided 336 qualified CD service hours to 18 organizations within this AA. Leadership is evident through board or committee participation, with 13 employees providing 282 service hours. Additionally, the bank hosted five eBus and Banking to Go events during 2022-2023 in the Charlotte MSA benefiting 373 individuals. The bank's assistance was responsive to a bank identified need for financial education. Service activity examples during 2022-2023 include:

- A bank employee provided 18 hours of financial education at an area middle school benefiting 68 low- and moderate-income youth.

- A bank employee served on the board of an area nonprofit that works to empower underserved youth and families and improve their quality of life through food security, access to education, and workforce development. During 2022-2023 the employee provided 51 hours of board service.

- The bank hosted an eBus event at a local high school located in a moderate-income geography in 2023 which benefited 119 individuals. Five bankers also provided 13 hours of financial education at the school in 2022.

Raleigh MSA AA

The institution provided a limited level of CD services. During the evaluation period, bank employees provided 96 hours of qualified CD service activities to nine organizations within this AA. Leadership is evident through board or committee participation, with four employees providing 27 service hours. Additionally, the bank hosted four eBus and Banking to Go events in the Raleigh MSA benefiting 199 individuals. The bank's assistance was responsive to identified needs in the AA, particularly with board participation. Service activity examples during the evaluation period include:

- Six bank employees provided 43 hours of financial education to elementary students utilizing the FDIC's Money Smart Program curriculum at a school where a majority of students qualify for free/reduced lunch.

- Bank employees provided 11 hours of homebuyer education to individuals being served by an area organization that creates affordable housing opportunities for individuals, families, and seniors across the region. Another bank employee served on the organization's finance committee providing five service hours in 2023.

- The bank hosted an eBus event at a local university located in a low-income geography in 2024 that benefited 82 individuals. During the event, bank employees provided financial education that covered how to interpret a credit report and identity theft protection measures.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's retail service delivery systems performance under the Service Test in the NC non-MSA AA is consistent with the bank's overall retail service delivery systems performance in the full-scope areas. The bank's retail service delivery systems performance under the Service Test, in the Asheville MSA, Durham MSA, and Hickory MSA AAs was weaker than the bank's overall retail service delivery systems performance in the full scope-areas due to weaker branch distributions. Performance differences in the limited-scope AAs had minimal impact on the overall state rating.

State of Ohio

CRA rating for the State of Ohio: Outstanding
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AA.
- The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments and grants which were responsive in addressing community needs.
- Service delivery systems were overall accessible to geographies and individuals of different income levels in the institution's AAs with consideration for middle- and upper-income adjacent and proximate branches and ADS. Weaker performance in the limited-scope areas negatively impacted the retail service delivery systems conclusion and lowered the Service Test rating.
- The bank provided an overall adequate level of CD services. CD services were responsive in addressing community needs.

Description of Institution's Operations in Ohio

The state of Ohio consists of 10 AAs. They include the entirety of the Akron, OH MSA (Akron MSA), the Dayton-Kettering-Beavercreek, OH MSA (Dayton MSA), the Lima, OH MSA (Lima MSA), the Springfield, OH MSA (Springfield MSA), the Toledo, OH MSA (Toledo MSA), portions of the Canton-Massillon, OH MSA (Canton MSA), the Cleveland, OH MSA (Cleveland MSA), the Columbus, OH MSA (Columbus MSA), the Sandusky, OH MSA (Sandusky MSA), and 17 nonmetropolitan counties comprising the Ohio non-MSA (OH non-MSA) AA. Examiners combined the nonmetropolitan counties into one AA for analysis and presentation. Refer to the table in appendix A for a list of counties reviewed.

As of year-end 2024, the bank operated 171 branches and 270 deposit-taking ATMs in this rating area. The bank had $23.9 billion in adjusted deposits in this rating area, which represented 14.6 percent of the bank's total adjusted deposits. This rating area was the bank's third largest in terms of deposits held. During the evaluation period, the bank made $4.8 billion or 17.9 percent

of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked fifth out of 128 FDIC-insured depository institutions with a 7.6 percent deposit market share in this rating area. The top three competitors had 56.2 percent of the market share and included The Huntington National Bank with 241 branches and 23.8 percent deposit market share, KeyBank, N.A. with 145 branches and 21 percent deposit market share, and JPMorgan Chase Bank, N.A. with 168 branches and 11.4 percent deposit market share.

Columbus MSA AA

The following table provides a summary of the demographics, including housing and business information, for the Columbus MSA AA.

Assessment Area - FS - Columbus MSA						
						2022 - 2024
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	479	12.73	22.55	32.57	30.27	1.88
Population by Geography	1,996,694	9.48	20.24	33.99	34.79	1.51
Housing Units by Geography	810,128	10.40	21.70	34.87	32.07	0.96
Owner-Occupied Housing by Geography	457,015	4.65	16.53	37.35	41.23	0.25
Occupied Rental Units by Geography	295,783	17.05	28.79	32.11	20.31	1.74
Vacant Units by Geography	57,330	21.84	26.38	29.39	19.81	2.57
Businesses by Geography	94,067	9.48	18.30	31.82	39.24	1.17
Farms by Geography	3,119	6.22	16.45	39.53	37.22	0.58
Family Distribution by Income Level	472,196	21.51	17.07	20.13	41.29	0.00
Household Distribution by Income Level	752,798	23.27	16.33	18.03	42.36	0.00
Unemployment rate (%)	4.37	9.92	6.02	3.83	2.53	8.75
Households Below Poverty Level (%)	11.61	32.59	17.21	8.53	4.50	41.07
Median Family Income (18140 - Columbus, OH MSA)		$84,088			**Median Housing Value**	$181,700
Median Family Income (18140 - Columbus, OH MSA) for 2024		$103,300			**Median Gross Rent**	$969
					Families Below Poverty Level	8.88
FFIEC File - 2020 Census						
FFIEC File - 2024 Census 2024 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

The Columbus MSA AA consisted of Delaware, Fairfield, Franklin, Licking, Pickaway, and Union counties. As of year-end 2024, the bank operated 43 branches and 62 deposit-taking ATMs in this AA.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, the bank ranked third out of 50 FDIC-insured depository institutions with a 6.7 percent deposit market share in this AA. The top two competitors had 64.5 percent of the market share and included The Huntington National Bank with 61 branches and 43.2 percent deposit market share, and JPMorgan Chase Bank, N.A. with 60 branches and 21.3 percent deposit market share.

In the performance context, examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be $975. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Based on the 2024 median family income, the calculated maximum affordable monthly mortgage payment was $1,291 for a low-income borrower and $2,066 for a moderate-income borrower. Based on these calculations, housing was affordable for both low- and moderate-income borrowers. Community contacts (see below) noted affordable housing continues to be a community need despite these calculations.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For this AA, 8.9 percent of families were living below the poverty level.

Economic Data

Data from the October 2024 Moody's Analytics report indicates the Columbus metro's labor market was sluggish in 2024, with employment being slightly lower than a year prior. While construction has fared well, healthcare, retail, administrative/waste services, and finance sectors have modestly reduced jobs. Job seekers are taking longer to find employment. A large government workforce insulates the metro area from economic cycles, as does the flagship public university, Ohio State University, which saw its largest-ever freshmen class in 2024. Major employers include Ohio State University, OhioHealth, JPMorgan Chase & Co., Nationwide Children's Hospital Inc., and The Kroger Co. Columbus has several structural advantages including faster population growth than the state overall, although recently experiencing a small net migration outflow. Single family home price appreciation slightly trails the statewide level. Area strengths include favorable migration patterns, age structure, and a highly educated workforce, low costs of living and doing business, and strong prospects in high-tech and other knowledge-based industries. Weaknesses include dependence on highly cyclical financial services.

According to the BLS, the non-seasonally adjusted unemployment rate for the Columbus MSA was 3.8 percent as of January 2022 and increased slightly to 3.9 percent as of December 2024. The national unemployment rate was 3.9 percent as of December 2024.

Community Contacts

Examiners reviewed information from six community contact interviews conducted during the evaluation period. Contacts included realty services, economic development and planning, a community development corporation, a chamber of commerce, and a social services agency. One contact stated there is virtually no affordable housing in the area, with a very low stock of homes under $100,000 and renting costs of roughly $1,400-$1,500 per month. Affordable housing has been an issue in the county for years and is getting increasingly worse and driving people out of the county to live in cheaper surrounding counties. Another contact mentioned the current environment, including higher interest rates and lower wages, are impacting the ability for individuals to qualify for a mortgage loan. One contact shared the need for small dollar lending as many clients go to payday lenders, which creates a cycle of debt. These sources identified the following needs and opportunities within the community:

- Increased affordable housing
- Homeownership assistance programs and education, especially for first-time homebuyers
- Investment in the area's redevelopment projects
- Access to capital to address community development needs within the community
- Land lease mortgage products for Land Trust properties
- Financial literacy and credit repair programs
- Small business loans
- Rental assistance programs
- Downpayment and closing cost assistance programs
- Flexible underwriting standards to expand access to credit for first-time homebuyers
- Create more flexible first-time homebuyer mortgages

Dayton MSA AA

The following table provides a summary of the demographics, including housing and business information, for the Dayton MSA AA.

Assessment Area - FS - Dayton MSA						
						2022 - 2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	221	11.76	22.62	36.65	27.60	1.36
Population by Geography	814,049	8.21	20.44	38.22	32.41	0.71
Housing Units by Geography	370,121	10.54	23.30	37.21	28.37	0.58
Owner-Occupied Housing by Geography	212,658	5.24	17.54	41.11	35.87	0.24
Occupied Rental Units by Geography	121,594	14.83	31.40	33.64	19.31	0.81
Vacant Units by Geography	35,869	27.44	29.95	26.22	14.60	1.79
Businesses by Geography	31,998	8.43	18.71	34.44	37.85	0.57
Farms by Geography	1,319	5.53	16.22	43.29	34.65	0.30
Family Distribution by Income Level	203,783	21.55	16.89	20.94	40.62	0.00

Household Distribution by Income Level	334,252	24.77	16.05	17.12	42.06	0.00
Unemployment rate (%)	5.68	12.32	7.92	4.83	3.51	12.75
Households Below Poverty Level (%)	13.66	33.00	21.95	9.81	6.26	40.75
Median Family Income (19430 - Dayton-Kettering-Beavercreek, OH MSA)		$75,125			**Median Housing Value**	$126,700
Median Family Income (19430 - Dayton-Kettering-Beavercreek, OH MSA) for 2024		$92,900			**Median Gross Rent**	$807
					Families Below Poverty Level	9.89
FFIEC File - 2020 Census						
FFIEC File - 2024 Census 2024 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

The Dayton MSA AA consisted of Greene, Miami, and Montgomery counties. As of year-end 2024, the bank operated 24 branches and 43 deposit-taking ATMs in this AA.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, the bank ranked first out of 27 FDIC-insured depository institutions with a 28 percent deposit market share in this AA.

In the performance context, examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be $680. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Based on the 2024 median family income, the calculated maximum affordable monthly mortgage payment was $1,161 for a low-income borrower and $1,858 for a moderate-income borrower. Based on these calculations, housing was affordable for both low- and moderate-income borrowers. Community contacts (see below) noted affordable housing continues to be a community need despite these calculations.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For this AA, 9.9 percent of families were living below the poverty level.

Economic Data

Data from the October 2024 Moody's Analytics report indicates the Dayton metro's economic performance is cooling, with year-over-year employment still up but monthly gains starting to diminish. Auto manufacturing remains a crucial sector for the economy, especially with significant investments in electric vehicle battery production, including Honda, a longstanding pillar of Dayton's economy. Governmental defense spending and the Wright-Patterson Air Force Base provide stability to the area, which provides downstream benefits to housing and

population. The base houses the National Air and Space Intelligence Center and the Air Force Research Laboratory. Major employers include Wright-Patterson Air Force Base, Kettering Health Network, Premiere Health Partners, The Kroger Co., Miami University, and Dayton Children's Hospital. Dayton experienced a net migration inflow that, while below the national average, surpassed the regional growth in 2023. Young adults lead the population gains, attracted to jobs in the manufacturing sector. Area strengths include a quality healthcare system that also serves the surrounding region, high industrial diversity, and stability from the Air Force base and universities. Weaknesses include an outsized share of low-wage jobs and an overreliance on manufacturing, and high employment volatility.

According to the BLS, the non-seasonally adjusted unemployment rate for the Dayton MSA was 4.4 percent as of January 2022 and remained stable at 4.4 percent as of December 2024. The national unemployment rate was 3.9 percent as of December 2024.

Community Contacts

Examiners reviewed information from five community contact interviews conducted during the evaluation period. Contacts included realty companies, a chamber of commerce, an affordable housing agency, and an economic and community development organization. The predominant challenge consistently identified is a low inventory of quality, safe, and affordable housing. The preservation of and addition to the affordable rental housing market will be critical to the local housing market. One contact stated there is a significant need for rehabilitation of existing affordable housing. Many of the affordable housing units are substandard. Another contact indicated there are new housing units that have been developed downtown but are priced too high for low- and moderate-income families. Home repairs and home modifications to help those that are aging stay in their homes are an identified need along with senior housing. There are limited choices available to households seeking multifamily rentals, as a result people are renting a unit beyond their financial means, living in substandard housing, or forced to move outside of the area. One contact stated there are not many private developers that are building new homes, let alone affordable or starter homes. These sources identified the following needs and opportunities within the community:

- Affordable housing development, including rental and senior housing
- Affordable rental properties that are well managed and maintained
- Microloans for home repairs
- Funding for the rehabilitation of existing affordable housing
- Increase marketing of available affordable housing loan products and banking services
- Financial literacy and credit repair programs
- Downpayment and closing cost assistance programs
- Technical assistance for small community organizations
- Multi-year funding, at impactful amounts, to reduce the fundraising burden on community groups
- Creation of a Housing Trust Fund to incentivize private developers
- Investing in CDFIs for affordable housing development
- EQ2 investments (ideally $500,000)
- New Markets Tax Credit investments

- Investments in loan funds
- Small business loans
- Volunteers to serve on loan review committees

Scope of Evaluation in Ohio

Examiners selected two AAs for full-scope reviews. Examiners conducted a full-scope review of the Columbus MSA AA and the Dayton MSA AA.

The Columbus MSA AA accounted for 28.5 percent of deposits, 25.2 percent of branches, and 24.2 percent of lending within the state during the evaluation period. Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked third out of 50 FDIC-insured depository institutions with a 6.7 percent deposit market share. FTB closed six branches in this AA during the evaluation period.

The Dayton MSA AA accounted for 17.7 percent of deposits, 14 percent of branches, and 13.5 percent of lending within the state during the evaluation period. Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked first out of 27 FDIC-insured depository institutions with a 28 percent deposit market share. FTB closed eight branches in this AA during the evaluation period. Additionally, during the evaluation period, FTB received a CRA-public comment and complaint letter related to a branch closure in the Dayton MSA AA.

The Akron MSA, Canton MSA, Cleveland MSA, Lima MSA, Sandusky MSA, Springfield MSA, Toledo MSA, and OH non-MSA AAs received limited-scope reviews. Refer to the table in appendix A for more information.

Examiners based their ratings primarily on the results of the areas that received the full-scope reviews and the bank's performance in the limited-scope areas. The Columbus MSA AA was the most heavily weighted when arriving at the overall conclusion for the state of Ohio.

Examiners placed more emphasis on home mortgage loans than small loans to businesses in arriving at the overall conclusion for all AAs in the rating area as they represented the majority of lending in all AAs. The bank originated or purchased too few small loans to farms in all AAs except the 2022-2023 OH non-MSA AA to conduct a meaningful analysis.

During the evaluation period, MSA boundary changes introduced in July 2023, effective January 1, 2024, by the United States OMB, resulted in the reclassification of Erie County from the non-MSA AA to the Sandusky MSA AA. For 2022-2023, Erie County is included in the OH non-MSA AA and for 2024, Erie County is included in the Sandusky MSA AA. For the Cleveland MSA AA, FTB's delineated AA did not change during the evaluation period; however, the Cleveland MSA number and name changed, which resulted in the need for two separate analyses for this AA.

Bank delineated AAs located in the same MSA are combined, analyzed, and presented as one AA for purposes of this evaluation. Similarly, bank delineated non-MSA AAs within the same state are combined, analyzed, and presented as one AA for purposes of this evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Columbus MSA AA and in the Dayton MSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Table 3: Lending Activity								**2022 - 2024**
Number of Loans								
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Consumer**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Columbus MSA	6,580	1,280	6	28	-	7,894	24.17	28.46
Dayton MSA	3,660	742	10	9	-	4,421	13.54	17.74
Akron MSA	2,050	308	0	7	-	2,365	7.24	5.22
Canton MSA	729	70	0	3	-	802	2.46	0.94
Cleveland MSA	7,886	1,204	1	9	-	9,100	27.86	23.07
Lima MSA	239	42	0	2	-	283	0.87	0.85
Sandusky MSA	50	11	0	0	-	61	0.19	0.56
Springfield MSA	285	32	0	6	-	323	0.99	0.76
Toledo MSA	3,123	487	0	9	-	3,619	11.08	12.52
OH non-MSA	3,294	468	28	3	-	3,793	11.61	9.87
Broader Statewide or Regional Area	0	0	0	2	-	2	0.01	NA
Total	**27,896**	**4,644**	**45**	**78**	-	**32,663**	**100.00**	**100.00**
Dollar Volume of Loans ($000s)								
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Consumer**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Columbus MSA	1,345,982	151,915	432	148,160	-	1,646,399	32.28	28.46
Dayton MSA	400,570	104,914	369	27,700	-	533,553	10.46	17.74
Akron MSA	307,109	51,829	0	31,533	-	390,471	7.66	5.22
Canton MSA	104,069	7,867	0	6,853	-	118,789	2.33	0.94
Cleveland MSA	1,269,543	185,721	8	25,288	-	1,480,560	29.03	23.07

Lima MSA	22,673	2,150	0	2,000	-	26,823	0.53	0.85
Sandusky MSA	5,626	849	0	0	-	6,475	0.13	0.56
Springfield MSA	29,401	4,611	0	17,700	-	51,712	1.01	0.76
Toledo MSA	351,050	69,381	0	23,595	-	444,026	8.71	12.52
OH non-MSA	347,590	46,763	1,741	3,658	-	399,752	7.84	9.87
Broader Statewide or Regional Area	0	0	0	2,000	-	2,000	0.04	NA
Total	**4,183,523**	**626,000**	**2,550**	**288,487**	-	**5,100,560**	**100.00**	**100.00**
Source: 1/1/2022 - 12/31/2024 Bank Data.								
Due to rounding, totals may not equal 100.0%								

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

Columbus MSA AA

Lending levels reflected excellent responsiveness to AA credit needs.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked third out of 50 FDIC-insured depository institutions (top 6 percent) with a 6.7 percent deposit market share.

For home mortgage loans, the bank's market share of 3.2 percent ranked fourth out of 580 lenders (top 1 percent). The top three lenders were Huntington National Bank with 9.6 percent market share, Rocket Mortgage with 3.6 percent market share, and Third Federal Savings and Loan with 3.3 percent market share.

For small loans to businesses, the bank's market share of 0.9 percent ranked 14th out of 141 lenders (top 10 percent). The top three lenders were JPMorgan Chase Bank, N.A. with 30.5 percent market share, American Express National Bank with 22.4 percent market share, and US Bank, N.A. with a 6.4 percent market share. The top small business lenders were institutions with large business credit card portfolios with average loan sizes of $15,000 or less. FTB's average small business loan size was $134,000.

Dayton MSA AA

Lending levels reflected excellent responsiveness to AA credit needs.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked first out of 27 FDIC-insured depository institutions with a 28 percent deposit market share.

For home mortgage loans, the bank's market share of 4.3 percent ranked fourth out of 465 lenders (top 1 percent). The top three lenders were Wright Patt Credit Union Inc with 12.3

percent market share, Union Savings Bank with 6.2 percent market share, and Huntington National Bank with 4.5 percent market share.

For small loans to businesses, the bank's market share of 1.7 percent ranked nineth out of 111 lenders (top 9 percent). The top three lenders were American Express National Bank with 23.3 percent market share, JPMorgan Chase Bank, N.A. with 19.8 percent market share, and US Bank, N.A. with 9 percent market share. The top small business lenders were institutions with large business credit card portfolios with average loan sizes of $19,000 or less. FTB's average small business loan size was $171,000

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AAs. The geographic distribution of home mortgage loans was good and the geographic distribution of small loans to businesses was excellent.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans was good. The geographic distribution of home mortgage loans in the Columbus MSA AA was good and the geographic distribution in the Dayton MSA AA was adequate.

Columbus MSA AA

The geographic distribution of home mortgage loans was good. The percentage of home mortgage loans originated or purchased in low-income geographies approximated the percentage of owner-occupied housing units located in those geographies but was below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies was below the percentage of owner-occupied housing units located in those geographies but was near to the aggregate percentage of all reporting lenders.

Dayton MSA AA

The geographic distribution of home mortgage loans was adequate. The percentage of home mortgage loans originated or purchased in low-income geographies was well below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies was below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was excellent. The geographic distribution of small loans to businesses in the Columbus MSA AA and the Dayton MSA AA was excellent.

Columbus MSA AA

The geographic distribution of small loans to businesses was excellent. The percentage of small loans to businesses originated or purchased in low-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

Dayton MSA AA

The geographic distribution of small loans to businesses was excellent. The percentage of small loans to businesses originated or purchased in low-income geographies was near to the percentage of businesses located in those geographies and exceeded the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AAs. Examiners did not identify any unexplained conspicuous gaps in the full-scope AAs reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution. The distribution of home mortgage loans was excellent and the distribution of loans to businesses of different sizes was good.

Home Mortgage Loans

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

The distribution of home mortgage loans was excellent. The distribution of home mortgage loans in the Columbus MSA AA and the Dayton MSA AA was excellent.

Columbus MSA AA

The distribution of home mortgage loans among individuals of different income levels was excellent. The percentage of home mortgage loans originated or purchased to low-income borrowers was below the percentage of those families in the AA but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate percentage of all reporting lenders.

Dayton MSA AA

The distribution of home mortgage loans among individuals of different income levels was excellent. The percentage of home mortgage loans originated or purchased to low-income borrowers approximated the percentage of those families in the AA and exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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

The distribution of loans to businesses of different sizes was good. The distribution of loans in both the Columbus MSA AA and Dayton MSA AA was good.

Columbus MSA AA

The distribution of loans to businesses of different sizes was good. The percentage of loans to small businesses originated or purchased was below the percentage of small businesses in the AA but exceeded the aggregate percentage of all reporting lenders.

Dayton MSA AA

The distribution of loans to businesses of different sizes was good. The percentage of loans to small businesses originated or purchased was below the percentage of small businesses in the AA but exceeded the aggregate percentage of all reporting lenders.

Community Development Lending

The institution was a leader in making CD loans.

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

Columbus MSA AA

The level of CD lending was excellent, which further supported the Lending Test conclusion. During the evaluation period, FTB originated 28 CD loans totaling $148.2 million or 17 percent of allocated tier 1 capital. By dollar volume, 66 percent funded affordable housing, 30.5 percent funded economic development, and 3.5 percent funded community services. CD loans were responsive to identified community needs including affordable housing. The following are examples of CD loans the bank originated or purchased in the AA:

- An $11 million construction loan to finance an affordable housing development using LIHTC funds. The apartment community will have a mix of 74 one- or two-bedroom apartments.

- A $19.6 million tax exempt construction loan to develop a 100-unit LIHTC apartment complex.

- A $5.3 million construction loan to finance a 42-unit LIHTC apartment complex for seniors with on-site services. All residents earn less than 80 percent of the area median income.

Dayton MSA AA

The level of CD lending was good. CD lending had a positive impact on the Lending Test conclusion. During the evaluation period, FTB originated nine CD loans totaling $27.7 million or 5.1 percent of allocated tier 1 capital. By dollar volume, 65 percent funded affordable housing, 30 percent funded economic development, and 5 percent funded community services. CD loans were responsive to identified community needs including affordable housing. The following are examples of CD loans the bank originated or purchased in the AA:

- A $9.5 million loan to finance a LIHTC affordable housing project in Dayton. The housing complex is designed for those aged 55 and over who earn less than 80 percent of the area median income.

- An $8.5 million loan to finance the construction of a 50-unit LIHTC housing project. The units will be subsidized on a 20-year contract.

- A $700,000 loan to an organization that provides housing, education, advocacy services, job placement, and other critical needs for homeless individuals.

Broader Statewide or Regional area

In addition, the bank made two CD loans totaling $2 million in the BSRA whose purpose, mandate, or function did not include serving the bank's AA. The BSRA lending had a supported the Lending Test rating.

Product Innovation and Flexibility

The institution used innovative and/or flexible lending practices in order to serve AA credit needs. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for details regarding the programs offered.

Columbus MSA AA

The institution used innovative and/or flexible lending practices in order to serve AA credit needs. The bank originated or purchased 817 loans under its flexible lending programs totaling $123.6 million.

Dayton MSA AA

The institution used innovative and/or flexible lending practices in order to serve AA credit needs. The bank originated or purchased 457 loans under its flexible lending programs totaling $58.8 million.

Conclusions for Areas Receiving Limited-Scope Reviews

Refer to Tables 7 through 12 in the state of Ohio section of appendix D for the facts and data that support the limited-scope conclusions.

Based on limited-scope reviews, the bank's performance under the Lending Test in the Akron MSA AA, Canton MSA AA, Cleveland MSA AA, Lima MSA AA, Springfield MSA AA, Toledo MSA AA, and the OH non-MSA AA was consistent with the bank's overall performance under the Lending Test in the full-scope areas. The bank's performance under the Lending Test in the Sandusky MSA AA was weaker than the bank's overall performance under the Lending Test in the full-scope areas. The weaker performance was due to a weaker borrower distribution and a lack of CD lending. Performance in the limited-scope AAs had a minimal impact on the overall state rating.

INVESTMENT TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in both the Columbus MSA AA and the Dayton MSA AA was excellent.

Table 4: Qualified Investments*										
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Columbus MSA	75	41,549	36	53,756	111	27.07	95,305	29.03	4	17,000
Dayton MSA	29	27,264	32	27,887	61	14.88	55,151	16.80	0	0
Akron MSA	30	18,877	8	7,538	38	9.27	26,415	8.05	0	0
Canton MSA	7	588	2	1,002	9	2.20	1,590	0.48	0	0
Cleveland MSA	45	25,813	25	38,962	70	17.07	64,775	19.73	2	8,500
Lima MSA	4	3,281	1	2	5	1.22	3,283	1.00	0	0
Sandusky MSA	1	60	1	1	2	0.49	61	0.02	0	0
Springfield MSA	10	2,442	3	11,326	13	3.17	13,768	4.19	0	0
Toledo MSA	21	13,972	16	23,646	37	9.02	37,618	11.46	0	0
OH non-MSA	32	12,115	11	12,551	43	10.49	24,666	7.51	0	0
Broader Statewide or Regional Area	20	5,652	1	0	21	5.12	5,653	1.72	0	0
Total	274	151,613	136	176,671	410	100.00	328,284	100.00	6	25,500

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

Columbus MSA AA

The institution had an excellent level of qualified investments, including grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current and prior period investments (excluding unfunded commitments) represented 11 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community development needs. Investments were particularly responsive to affordable housing needs. The institution occasionally used innovative and/or complex investments to support CD initiatives. By dollar volume during the current period, 98 percent of total investments and grants supported affordable housing, 1.6 percent funded revitalization and stabilization efforts, 0.3 percent supported community services to low- and moderate-income individuals, and 0.1 percent promoted economic development. The following are examples of qualified investments in the AA:

- The bank, in a leadership position, made a complex $13.7 million investment in a single investor LIHTC fund for the development of a 74-unit housing development where 55 units are restricted to 60 percent of the area median income, including four units reserved for formerly homeless households. The bank demonstrated a multifaceted approach by also providing $11 million in construction financing through a CD loan.

- The bank made an $11.7 million investment in a multi-investor LIHTC fund for a 100-unit apartment complex restricted to individuals at 30 percent, 50 percent, and 60 percent of the area median income. The bank demonstrated a multifaceted approach by also providing $19.6 million in construction financing through a CD loan.

- The bank made a $1.5 million non-tax credit investment to support 150 units of affordable housing. The investment responded to a community-identified need for affordable housing.

Dayton MSA AA

The institution had an excellent level of qualified investments, including grants, but not in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current and prior period investments represented 10.2 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community development needs. Investments were particularly responsive to affordable housing needs. The institution did not use innovative and/or complex investments to support CD initiatives. By dollar volume during the current period, 63.1 percent of total investments and grants supported affordable housing, 36.2 percent promoted economic development, and 0.7 percent supported community services to low- and moderate-income individuals. The following are examples of qualified investments in the AA:

- The bank made a $7.9 million investment in a multi-investor LIHTC fund for the construction of a 144-unit rent-restricted affordable housing apartment complex, restricted to seniors aged 55 and above who earn 50 percent to 60 percent of the area median income. The bank demonstrated a multifaceted approach by also providing $9.5 million in financing through a CD loan.

- The bank made a $9.7 million investment in a multi-investor LIHTC fund for the construction of a 50-unit affordable housing development restricted to households earning 30 percent and 60 percent of the area median income. All 50 units operate with Section 8 rental assistance. The bank demonstrated a multifaceted approach by also providing $8.5 million in construction financing through a CD loan.

- The bank made a $15,000 grant to support an organization whose mission is to end homelessness. The grant supported a project to transform vacant land into a thriving community, as well as creating employment opportunities for low-income households. The bank demonstrated a multifaceted approach by also providing $700,000 in working capital financing through a CD loan.

Broader Statewide or Regional Area

In addition, the bank made 21 investments totaling $5.7 million in projects or organizations in the BSRA whose purpose, mandate, or function included serving the bank's AA. Of these, 20 investments were from the prior period with a remaining book value of $5.7 million. The BSRA investments supported the overall Investment Test rating.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Akron MSA AA, Cleveland MSA AA, Lima MSA AA, Springfield MSA AA, Toledo MSA AA, and OH non-MSA AA was consistent with the bank's overall performance under the Investment Test in the full-scope areas. Performance under the Investment Test in the Canton MSA AA and Sandusky MSA AA was weaker than the bank's overall performance under the Investment Test in the full-scope areas due to a lower level of investments. Performance in the limited-scope AAs had minimal impact on the overall state rating.

SERVICE TEST

The bank's performance under the Service Test in Ohio is rated High Satisfactory. Weaker performance in the limited scope areas negatively impacted the retail service delivery systems conclusion and lowered the Service Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Columbus MSA AA was excellent and in the Dayton MSA AA was good.

Retail Banking Services

Table 5: Distribution of Branch Delivery Systems													2024
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Columbus MSA	28.46	43	25.15	11.63	18.60	25.58	44.19	0.00	9.48	20.24	33.99	34.79	1.51
Dayton MSA	17.74	24	14.04	0.00	25.00	33.33	41.67	0.00	8.21	20.44	38.22	32.41	0.71
Akron MSA	5.22	14	8.19	14.29	0.00	42.86	35.71	7.14	8.39	19.49	39.23	30.78	2.10
Canton MSA	0.94	3	1.75	0.00	0.00	33.33	66.67	0.00	6.68	14.66	49.61	29.05	0.00
Cleveland MSA	23.07	44	25.73	9.09	22.73	34.09	34.09	0.00	9.49	18.33	35.14	35.70	1.34
Lima MSA	0.85	2	1.17	0.00	50.00	50.00	0.00	0.00	8.50	24.86	43.87	22.78	0.00
Sandusky MSA	0.56	1	0.58	0.00	100.00	0.00	0.00	0.00	3.42	26.53	58.00	12.05	0.00
Springfield MSA	0.76	2	1.17	0.00	0.00	100.00	0.00	0.00	7.61	20.73	41.44	30.21	0.00
Toledo MSA	12.52	19	11.11	0.00	26.32	26.32	36.84	10.53	8.42	17.65	34.68	34.50	4.74
OH non-MSA	9.87	19	11.11	10.53	21.05	57.89	10.53	0.00	1.50	14.56	59.10	24.26	0.58
Total	100.00	171	100.00	7.10	20.65	34.19	36.13	1.94	8.05	18.71	39.30	32.50	1.45
Source: FFIEC File - 2024 Census													
1/1/2022 - 12/31/2024 Bank Data													
Due to rounding, totals may not equal 100.0%													

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

Columbus MSA AA

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income

geographies exceeded, and in moderate-income geographies approximated, the percentage of the population living within those geographies.

The bank had several ADS including ATMs, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers and were positively considered in the service delivery systems conclusion. The bank had 69 ATMs in the AA, 62 of which were deposit-taking. Per data provided by the bank, as of the end of the evaluation period, bank customers located in low- and moderate-income geographies used online banking at a rate (45.1 percent) less than customers in middle- and upper-income geographies (53.7 percent), while mobile banking usage rates amongst customers in low- and moderate-income geographies (62 percent) were higher than that of customers in middle- and upper-income geographies (58.8 percent). During the evaluation period, online banking usage increased 5.1 percent for customers located in low- and moderate-income geographies and increased 4.5 percent for customers in middle- and upper-income geographies. Mobile banking usage increased 7.8 percent for customers located in low- and moderate-income geographies and 10.5 percent for customers in middle- and upper-income geographies.

Dayton MSA AA

Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AA. The bank did not have any branches in low-income geographies. The bank's distribution of branches in low-income geographies was significantly below, and in moderate-income geographies exceeded, the percentage of the population living within those geographies. Examiners considered three branches located in middle- or upper-income geographies that were within 1,000 feet of moderate-income geographies within the AA. Additionally, the OCC considered three middle- or upper-income branches that were in close proximity to low-income geographies and served customers residing in those areas as demonstrated by bank customer usage data. These branches improved accessibility and had a positive impact on the retail Service Test conclusion.

The bank had several ADS including ATMs, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers and were positively considered in the service delivery systems conclusion. The bank had 51 ATMs in the AA, 43 of which were deposit-taking. Per data provided by the bank, as of the end of the evaluation period, bank customers located in low- and moderate-income geographies used online banking at a rate (41.8 percent) less than customers in middle- and upper-income geographies (51 percent), while mobile banking usage rates amongst customers in low- and moderate-income geographies (52.5 percent) were the same as that of customers in middle- and upper-income geographies (52.5 percent). During the evaluation period, online banking usage increased 12.4 percent for customers located in low- and moderate-income geographies and increased 6.7 percent for customers in middle- and upper-income geographies. Mobile banking usage increased 11 percent for customers in low- and moderate-income geographies and 12.4 percent for customers in middle- and upper-income geographies.

Table 6: Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Columbus MSA	0	6	0	-3	-1	-2	0
Dayton MSA	1	8	0	-1	-3	-3	0
Akron MSA	0	2	0	0	-2	0	0
Canton MSA	0	0	0	0	0	0	0
Cleveland MSA	0	5	0	0	-2	-3	0
Lima MSA	0	0	0	0	0	0	0
Sandusky MSA	0	0	0	0	0	0	0
Springfield MSA	0	0	0	0	0	0	0
Toledo MSA	0	4	-1	0	-1	-2	0
OH non-MSA	0	3	0	-1	-1	-1	0
Total	1	28	-1	-5	-10	-11	0
1/1/2022 - 12/31/2024 Bank Data.							

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

Columbus MSA AA

To the extent changes have been made, the institution's opening and closing of branches has adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, the bank closed six branches, none of which were in low-income geographies and three of which were in moderate-income geographies. The branch closures were a result of low productivity and nearby branch overlap. Five of the branches closed were Bank Mart (in-store) facilities located inside of a grocery store, two of which were in moderate-income geographies. The bank did not open any branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. Average hours of operation for branches in low- and moderate-income geographies were greater than branches in middle- and upper-income geographies. Branch hours were consistent based on the branch type. There were 41 Standard Banking Center branches that primarily had lobby hours of 9:00 a.m. to 5:00 p.m. Monday through Thursday and 9:00 a.m. to 6:00 p.m. on Friday, with 38 Banking Center branches open Saturday from 9:00 a.m. to 12:00 p.m. There was one Banking Mart (in-store) branch, which was in a moderate-income geography, that had lobby hours of 10:00 a.m. to 7:00 p.m. Monday through Friday and 10:00 a.m. to 5:00 p.m. on Saturday. There were 39 locations with drive-thru facilities, which included four of five branches in low-income geographies and seven of eight branches in moderate-income geographies. The two branches in low- or moderate-income-geographies without a drive-thru were due to physical limitations at the location.

Dayton MSA AA

To the extent changes have been made, the institution's opening and closing of branches has adversely affected the accessibility of its delivery systems, particularly in moderate-income

geographies and/or to low- and moderate-income individuals. During the evaluation period, the bank closed eight branches, none of which were in low-income geographies and two of which were in moderate-income geographies. The branch closures were a result of low productivity and nearby branch overlap. Five of the branches closed were Bank Mart (in-store) facilities located inside of a grocery store, one of which was in a moderate-income geography. The bank opened one branch in a moderate-income geography during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced, the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. Average hours of operation for branches in low- and moderate-income geographies were less than those branches in middle- and upper-income geographies. However, this was attributed to one branch in a middle-income geography open until 3:00 p.m. on Saturday and one branch in an upper-income geography that opened earlier (8:00 a.m.) Monday through Friday. All other branches were Standard Banking Center branches with lobby hours of 9:00 a.m. to 5:00 p.m. Monday through Thursday and 9:00 a.m. to 6:00 p.m. on Friday, with 19 of them open Saturday from 9:00 a.m. to 12:00 p.m. There were 22 locations with drive-thru facilities, which included all branches in low- and moderate-income geographies.

Community Development Services

Columbus MSA AA

The institution provided an adequate level CD services. During the evaluation period, bank employees provided 463 hours of qualified CD service activities to 22 organizations within this AA. Leadership is evident through board or committee participation, with nine employees providing 300 service hours to 22 organizations. Additionally, the bank hosted 27 eBus and Banking to Go events during the evaluation period in the Columbus MSA AA benefiting 1,504 individuals. The bank's assistance was responsive to an identified need in the AA, primarily financial literacy and affordable housing. Service activity examples during the evaluation period include:

- A bank employee provided 85 hours of board services for a nonprofit housing developer. The organization builds quality, affordable homes, primarily financed with private investment leveraged by Federal tax credits. They also provide direction and training to low- and moderate-income individuals in key areas such as the home buying process, setting a budget, and avoiding foreclosure.

- A bank employee provided 50 hours of board services for a community service organization that focuses on fighting poverty. The organization provides support to low- and moderate-income individuals in the community through a variety of services, including housing stability, utility assistance, emergency rental aid, workforce development training, youth services, and energy efficiency programs

- A bank employee provided 58 hours of financial education to small business owners working as a mentor for a local small business support organization. The organization matches small business owners with volunteer mentors that provide experienced advice, consultation on best practices, and education on topics that affect small businesses.

Dayton MSA AA

The institution provided a relatively high level of CD services. During the evaluation period, bank employees provided 337 hours of qualified CD service activities to 16 organizations within this AA. Leadership is evident through board or committee participation, with nine employees providing 288 service hours to 11 organizations. Additionally, the bank hosted 21 eBus and Banking to Go events during the evaluation period in the Dayton MSA AA benefiting 3,119 individuals. The bank's assistance was responsive to an identified need in the AA, primarily financial literacy and affordable housing. Service activity examples during the evaluation period include:

- A bank employee provided 92 hours of board services for a nonprofit organization that provides resources to food and beverage small business startups. They assist in establishing incubator kitchens, provide financial literacy programs, and support agricultural and workplace development initiatives.

- A bank employee provided 55 hours of board services for a nonprofit organization whose mission is to end generational poverty. They assist individuals to establish careers, become entrepreneurs, build wealth, and develop as leaders. Their programs include a financial empowerment center dedicated to helping low- and moderate-income families and individuals achieve financial stability, and a business development and entrepreneurship center, that helps small businesses take advantage of new business opportunities and qualify for financing.

- Two bank employees provided 39 hours of board services for a nonprofit organization that provides essential services, support, and resources to individuals experiencing homelessness. The organization provides access to safe housing, basic necessities, education, health services, and employment opportunities to homeless youth and young adults.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's retail service delivery system performance under the Service Test in the Cleveland MSA AA and OH non-MSA AA was consistent with the bank's overall retail service delivery system performance in the full-scope areas. Retail service delivery system performance under the Service Test in the Akron MSA, Canton MSA, Lima MSA, Sandusky MSA, Springfield MSA, and Toledo MSA AAs was weaker than the bank's overall retail service delivery system performance in the full-scope areas due to weaker branch distributions. Weaker performance in the limited scope areas negatively impacted the retail service delivery systems conclusion and lowered the Service Test rating.

State of South Carolina

CRA rating for the State of South Carolina: Satisfactory
The Lending Test is rated: High Satisfactory
The Investment Test is rated: High Satisfactory
The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflected good responsiveness to AA credit needs.
- The bank exhibited an excellent geographic distribution of loans in its AA.
- The bank exhibited an adequate distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.
- Performance in the limited-scope AAs was weaker than performance in the full-scope AA and negatively impacted the Lending Test rating for the state of South Carolina.
- The bank had an excellent level of qualified CD investments and grants which were responsive in addressing community needs in the full-scope AA. Performance in the limited-scope AAs was weaker than performance in the full-scope AA and negatively impacted the Investment Test rating for the state of South Carolina.
- Service delivery systems were overall accessible to geographies and individuals of different income levels in the institution's AAs with consideration for middle- and upper-income proximate branches and ADS.
- The bank provided a limited level of CD services. CD services were responsive in addressing community needs.

Description of Institution's Operations in South Carolina

The state of South Carolina consists of three AAs including portions of the Charleston-North Charleston, SC MSA (Charleston MSA), the Greenville-Anderson-Greer, SC MSA (Greenville MSA), and the Spartanburg, SC MSA (Spartanburg MSA). Refer to the table in appendix A for a list of counties reviewed.

As of year-end 2024, the bank operated 10 branches and 10 deposit-taking ATMs in this rating area. The bank had $702.5 million in deposits in this rating area, which represented 0.4 percent of the bank's total adjusted deposits. This rating area was the bank's 13th largest in terms of deposits held. During the evaluation period, the bank made $353 million or 1.3 percent of its

total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked 13th out of 46 FDIC-insured depository institutions with a 1.7 percent deposit market share in this rating area. The top three competitors had 40.5 percent of the market share and included Wells Fargo Bank, N.A. with 35 branches and 14.7 percent deposit market share, Truist Bank with 29 branches and 12.9 percent deposit market share, and Bank of America, N.A. with 26 branches and 12.9 percent deposit market share.

Greenville MSA AA

The following table provides a summary of the demographics, including housing and business information, for the Greenville MSA AA.

Assessment Area - FS - Greenville MSA						
						2022 - 2024
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	123	5.69	24.39	33.33	35.77	0.81
Population by Geography	525,534	3.76	18.61	35.30	41.71	0.63
Housing Units by Geography	214,785	3.72	20.18	35.11	40.22	0.77
Owner-Occupied Housing by Geography	135,145	2.38	15.48	35.79	46.13	0.22
Occupied Rental Units by Geography	62,870	6.20	28.87	33.57	29.55	1.81
Vacant Units by Geography	16,770	5.22	25.51	35.45	32.56	1.26
Businesses by Geography	29,680	3.18	17.63	30.18	47.88	1.13
Farms by Geography	889	2.25	18.56	39.71	39.03	0.45
Family Distribution by Income Level	132,726	18.61	16.28	19.96	45.14	0.00
Household Distribution by Income Level	198,015	20.99	15.47	17.66	45.88	0.00
Unemployment rate (%)	3.95	10.19	4.96	4.09	2.82	12.39
Households Below Poverty Level (%)	11.26	34.84	17.75	10.22	6.77	20.78
Median Family Income (24860 - Greenville-Anderson-Greer, SC MSA)		$71,958			**Median Housing Value**	$183,100
Median Family Income (24860 - Greenville-Anderson-Greer, SC MSA) for 2024		$84,700			**Median Gross Rent**	$883
					Families Below Poverty Level	7.69
FFIEC File - 2020 Census						
FFIEC File - 2024 Census 2024 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

The Greenville MSA AA consisted of Greenville County. As of year-end 2024, the bank operated seven branches and seven deposit-taking ATMs in this AA.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, the bank ranked 12th out of 36 FDIC-insured depository institutions with a 1.9 percent deposit market share in this AA. The top three competitors had 36.1 percent of the market share and included Truist Bank with 14 branches and 12.9 percent deposit market share, Wells Fargo Bank, N.A. with 14 branches and 12.8 percent deposit market share, and Bank of America, N.A. with 12 branches and 10.4 percent deposit market share.

In the performance context, examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be $983. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Based on the 2024 median family income, the calculated maximum affordable monthly mortgage payment was $1,059 for a low-income borrower and $1,694 for a moderate-income borrower. Based on these calculations, housing was affordable for both low- and moderate-income borrowers.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For this AA, 7.7 percent of families were living below the poverty level.

Economic Data

Data from the August 2024 Moody's Analytics report indicates Greenville metro job growth is above the national average but below the state average. Recent job gains have been concentrated in the leisure/hospitality sector, with healthcare and transportation also contributing, whereas manufacturing and government sectors have shown weakness. Major employers include Prisma Health, Michelin North America, Clemson University, Milliken & Co., Bon Secours St. Francis Health System, and Duke Energy Corp. Greenville experienced a net migration inflow. The metro added population at three times the national average in 2023, as the area has low living costs, a favorable climate, and attractive amenities. Single family housing construction has weakened. Clemson University has rapidly grown over the past decade and provides a stable source of jobs. Area strengths include Clemson University's stabilizing effect on employment and an expanding population with improving education achievement. Weaknesses include a high share of old-line manufacturing, rising level of low-paying service jobs, and high employment volatility.

According to the BLS, the non-seasonally adjusted unemployment rate for the Greenville MSA was 3.2 percent as of January 2022 and increased to 3.6 percent as of December 2024. The national unemployment rate was 3.9 percent as of December 2024.

Community Contacts

Examiners reviewed information from one community contact interview conducted during the evaluation period. The contact was with an organization that provides community services. The primary needs are funding for the organization as well as volunteerism by financial institutions.

Scope of Evaluation in South Carolina

Examiners selected one AA for a full-scope review. Examiners conducted a full-scope review of the Greenville MSA AA as it is the largest AA in the state of South Carolina in terms of deposits and branches. The Charleston MSA and Spartanburg MSA AAs received limited-scope reviews. Refer to the table in appendix A for more information.

Examiners based their ratings primarily on the results of the areas that received the full-scope reviews and the bank's performance in the limited-scope areas, as applicable. The Greenville MSA AA and the Charleston MSA AAs were the most heavily weighted when arriving at the overall conclusion for the state of South Carolina.

Examiners placed more emphasis on home mortgage loans than small loans to businesses in arriving at the overall conclusion for all AAs in the rating area as they represented the majority of lending in all AAs. The bank did not originate or purchase small loans to farms in any AA in this rating area.

On December 19, 2023, FTB opened a branch in Spartanburg County, creating the Spartanburg, SC MSA AA (Spartanburg MSA). Examiners will only evaluate the Spartanburg AA for 2024.

On July 11, 2023, FTB opened a branch in Charleston County, creating the Charleston-North Charleston, SC MSA AA (Charleston MSA). Because the bank was in this county for less than six months in 2023, an analysis for 2023 would not be meaningful. Charleston County will be included in this evaluation for 2024. On July 30, 2024, FTB opened a branch in Dorchester County, which is part of the Charleston MSA AA. Dorchester County will not be included in the AA or the evaluation because the bank entered this county less than six months before the end of the evaluation period and the analysis would not be meaningful.

On December 17, 2024, FTB opened a branch in Beaufort County, creating the Hilton Head Island-Bluffton-Port Royal SC MSA AA (Hilton Head MSA). This AA will not be included in the evaluation because the bank entered this county and AA less than six months before the end of the evaluation period and the analysis would not be meaningful.

Bank delineated AAs located in the same MSA are combined, analyzed, and presented as one AA for purposes of this evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SOUTH CAROLINA

LENDING TEST

The bank's performance under the Lending Test in South Carolina is rated High Satisfactory. Weaker performance in the limited-scope AAs negatively impacted and lowered the Lending Test rating for the state of South Carolina.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Greenville MSA AA was excellent.

Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Table 3: Lending Activity								**2022 - 2024**
Number of Loans								
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Consumer**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Greenville MSA	355	48	0	3	-	406	58.17	48.62
Charleston MSA	221	18	0	0	-	239	34.24	44.87
Spartanburg MSA	38	9	0	2	-	49	7.02	6.51
Broader Statewide or Regional Area	0	0	0	4	-	4	0.57	NA
Total	**614**	**75**	**0**	**9**	**-**	**698**	**100.00**	**100.00**
Dollar Volume of Loans ($000s)								
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Consumer**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Greenville MSA	132,722	9,913	0	7,800	-	150,435	40.92	48.62
Charleston MSA	191,069	4,029	0	0	-	195,098	53.07	44.87
Spartanburg MSA	13,488	1,738	0	7,500	-	15,226	4.14	6.51
Broader Statewide or Regional Area	0	0	0	6,833	-	6,833	1.86	NA
Total	**337,279**	**15,680**	**0**	**22,133**	**-**	**367,592**	**100.00**	**100.00**
Source: 1/1/2022 - 12/31/2024 Bank Data.								
Due to rounding, totals may not equal 100.0%								

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

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked 12th out of 36 FDIC-insured depository institutions (top 34 percent) with a 1.9 percent deposit market share.

For home mortgage loans, the bank's market share of 0.7 percent ranked 36th out of 479 lenders (top 8 percent). The top three lenders were PennyMac Loan Services LLC with 5.4 percent market share, Rocket Mortgage with 4.9 percent market share, and Amerihome Mortgage Company with a 3.6 percent market share.

For small loans to businesses, the bank's market share of 0.1 percent ranked 32nd out of 102 lenders (top 32 percent). The top three lenders were American Express National Bank with 26.4 percent market share, JPMorgan Chase Bank, N.A. with 14.7 percent market share, and Bank of America, N.A. with 8.1 percent market share. The top small business lenders were institutions with large business credit card portfolios with average loan sizes of $17,000 or less. FTB's average small business loan size was $229,000.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA. The distribution of home mortgage loans was excellent and the distribution of small loans to businesses was good.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans was excellent. The percentage of home mortgage loans originated or purchased in low-income geographies exceeded both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies exceeded both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was good. The percentage of small loans to businesses originated or purchased in low-income geographies was below both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies approximated the percentage of businesses located in those geographies and exceeded the aggregate percentage of all reporting lenders.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AA. Examiners did not identify any unexplained conspicuous gaps in the full-scope AA reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an adequate distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution. The distribution of home mortgage loans was adequate and the distribution of loans to businesses of different sizes was good.

Home Mortgage Loans

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

The distribution of home mortgage loans among individuals of different income levels was adequate. The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below the percentage of those families in the AA and was well below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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

The distribution of loans to businesses of different sizes was good. The percentage of loans to small businesses originated or purchased was below the percentage of small businesses in the AA but exceeded the aggregate percentage of all reporting lenders.

Community Development Lending

The institution was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.

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

The level of CD lending was excellent. During the evaluation period, FTB originated three CD loans totaling $7.8 million or 17.9 percent of allocated tier 1 capital. By dollar volume, 76.9 percent funded economic development and 23.1 percent funded affordable housing. CD loans were responsive to identified community needs including affordable housing. The following is an example of a CD loan the bank originated or purchased in the AA:

- A $1.8 million loan to a housing tax credit syndicator to bridge investor equity in LIHTC projects. This loan supported a 60-unit affordable housing apartment complex.

Broader Statewide or Regional area

In addition, the bank made four CD loans totaling $6.8 million in the broader statewide and regional area whose purpose, mandate, or function did not include serving the bank's AA. The BSRA lending supported the Lending Test rating.

Product Innovation and Flexibility

The institution used innovative and/or flexible lending practices in order to serve AA credit needs. The bank originated or purchased 52 loans under its flexible lending programs totaling $12 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for details regarding the programs offered.

Conclusions for Areas Receiving Limited-Scope Reviews

Refer to Tables 7 through 10 in the state of South Carolina section of appendix D for the facts and data that support the limited-scope conclusions.

Based on limited-scope reviews, the bank's performance under the Lending Test in the Charleston MSA AA and the Spartanburg MSA AA was weaker than the bank's overall performance under the Lending Test in the full-scope area. The weaker performance in the Charleston MSA AA was due to a weaker geographic and borrower distribution, as well as no CD lending. The weaker performance in the Spartanburg MSA AA was due to a weaker geographic and borrower distribution. Performance in the limited-scope AAs was weaker than performance in the full-scope area and negatively impacted the Lending Test rating for the state of South Carolina.

INVESTMENT TEST

The bank's performance under the Investment Test in South Carolina is rated High Satisfactory. Weaker performance in the limited-scope AAs negatively impacted and lowered the Investment Test rating for the state of South Carolina.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in Greenville MSA AA was excellent.

Table 4: Qualified Investments*										
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Greenville MSA	0	0	4	2,038	4	100.00	2,038	100.00	0	0
Charleston MSA	0	0	0	0	0	0.00	0	0.00	0	0
Spartanburg MSA	0	0	0	0	0	0.00	0	0.00	0	0
Broader Statewide or Regional Area	0	0	0	0	0	0.00	0	0.00	0	0
Total	0	0	4	2,038	4	100.00	2,038	100.00	0	0

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

When considering the responsiveness of qualified investments and the bank's efforts that were impacted by strong competition for the available LIHTC opportunities in the AA, the institution had an excellent level of qualified investments, including grants, but not in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current and prior period investments represented 4.7 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community development needs. Investments were particularly responsive to affordable housing needs. The institution did not use innovative and/or complex investments to support CD initiatives. By dollar volume during the current period, 98.2 percent of total investments and grants supported affordable housing, nearly 1 percent promoted economic development, and 0.9 percent supported community services to low- and moderate-income individuals. The following are examples of qualified investments in the AA:

- The bank made a $2 million investment in a multi-investor LIHTC fund for a 180-unit affordable housing complex, where household income is restricted to 60 percent of the area median income. The investment responded to a bank-identified need for affordable housing.

- The bank made a $20,000 grant to a nonprofit organization serving underserved families through financial education, lending, and investing.

- The bank made a $7,500 grant to support an organization's daily food rescue and delivery program. All families and individuals fed through the program are low-income or very low-income.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Charleston MSA AA and Spartanburg MSA AA was weaker than the bank's overall performance under the Investment Test in the full-scope area. The bank did not make any investments, grants or donations in the Charleston MSA AA or the Spartanburg MSA AA.

Performance in the limited-scope AAs, particularly the Charleston MSA AA, had a material impact on the overall state rating, resulting in a lower rating than the full-scope AA.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

Table 5: Distribution of Branch Delivery Systems													2024
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Greenville MSA	48.62	7	70.00	0.00	14.29	0.00	71.43	14.29	3.76	18.61	35.30	41.71	0.63
Charleston MSA*	44.87	2	20.00	0.00	50.00	0.00	50.00	0.00	7.66	19.87	25.50	45.25	1.72
Spartanburg MSA	6.51	1	10.00	0.00	0.00	0.00	100.00	0.00	4.20	14.41	47.23	32.96	1.20
Total	100.00	10	100.00	0.00	20.00	0.00	70.00	10.00	5.14	17.92	35.23	40.58	1.13
Source: FFIEC File - 2024 Census *1/1/2022 - 12/31/2024 Bank Data* *Due to rounding, totals may not equal 100.0%* **# of Bank Branches does not include branch opened in July 2024 in Dorchester County*													

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

Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AA. The bank had no branches in low- income geographies. The bank's distribution of branches in low-income geographies was significantly below, and in moderate-income geographies was near to, the percentage of the population living within those geographies. Examiners considered two upper-income branches and one branch in an unknown income category that were in close proximity to low- or moderate-income geographies and served customers residing in those areas as demonstrated by bank customer usage data. Of the three proximate branches, one served a low-income geography and two served moderate-income geographies. These branches improved accessibility and had a positive impact on the retail Service Test conclusion.

The bank had several ADS including ATMs, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers and were positively considered in the service delivery systems conclusion. The bank had seven ATMs in the AA, all of which were deposit-taking. Per data provided by the bank, as of the end of the evaluation period, bank customers located in low- and moderate-income geographies used online banking at a rate (44.5 percent) slightly less than customers in middle- and upper-income geographies (45.5 percent), while mobile banking usage rates amongst customers in low- and moderate-income geographies (66.4 percent) were higher

than that of customers in middle- and upper-income geographies (58.8 percent). During the evaluation period, online banking usage decreased 8.5 percent for customers located in low- and moderate-income geographies and decreased 11.7 percent for customers in middle- and upper-income geographies. Mobile banking usage increased 13.1 percent for customers in low- and moderate-income geographies and increased 0.4 percent for customers in middle- and upper-income geographies.

Table 6: Distribution of Branch Openings/Closings

Branch Openings/Closings							
Assessment Area	**# of Branch Openings**	**# of Branch Closings**	**Net change in Location of Branches (+ or -)**				
			Low	**Mod**	**Mid**	**Upp**	**NA**
Greenville MSA	6	0	0	1	0	5	0
Charleston MSA*	2	0	0	1	0	1	0
Spartanburg MSA**	1	0	0	0	0	1	0
Total	9	0	0	2	0	7	0

1/1/2022 - 12/31/2024 Bank Data.

**# of Branch Openings includes one branch opened in Charleston County in July 2023 which created the Charleston MSA AA for 2024.*

**# of Branch Openings does not include branch opened in July 2024 in Dorchester County.*

***# of Branch Openings includes one branch opened in Spartanburg County in December 2023 which created the Spartanburg MSA AA for 2024.*

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

To the extent changes have been made, the institution's opening and closing of branches has improved the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank did not close any branches during the evaluation period. The bank opened six branches during the evaluation period, one of which was in a moderate-income geography.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly low- and moderate-income geographies and/or individuals. Average hours of operation for the one branch in a moderate-income geography was comparable to the branches in middle- and upper-income geographies. The bank maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. All branches had the same lobby hours of 9:00 a.m. to 5:00 p.m. Monday through Thursday and 9:00 a.m. to 6:00 p.m. on Friday. Of the seven AA branches, six, including the moderate-income branch, were open from 9:00 a.m. to 12:00 p.m. on Saturdays. Six branch locations in the AA had drive-thru facilities, including the one moderate-income branch.

Community Development Services

The institution provided a limited level of CD services. During the evaluation period, bank employees provided 61 hours of qualified CD service activities to four organizations within this AA. Leadership is evident through board or committee participation, with two employees providing 18 service hours. The bank's assistance was responsive to a bank-identified need for financial education. Service activity examples during the evaluation period include:

- A bank assistance vice president provided nine hours of board service in 2024 to an area nonprofit that provides essential baby items to families in need.

- Bank employees volunteered 26 hours providing financial education to middle school students at an area school where the majority of students qualify for free or reduced-price lunch.

- A bank employee volunteered 13 hours providing financial education to elementary school students at an area school where the majority of students qualify for free or reduced-price lunch.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's retail service delivery systems performance under the Service Test in the Charleston MSA AA was consistent with the bank's overall retail service delivery systems performance in the full-scope area. The bank's retail service delivery systems performance in the Spartanburg MSA AA was weaker than the bank's overall retail service delivery systems performance in the full-scope area due to weaker branch distribution. Performance differences in the limited-scope AAs had minimal impact on the overall state rating.

State of Tennessee

CRA rating for the State of Tennessee: Outstanding
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments and grants which were responsive in addressing community needs.
- Service delivery systems were overall readily accessible to geographies and individuals of different income levels in the institution's AAs with consideration for middle- and upper-income adjacent branches and ADS.
- The bank provided a relatively high level of CD services. CD services were responsive in addressing community needs.

Description of Institution's Operations in Tennessee

The state of Tennessee consists of two AAs including portions of the Knoxville, TN MSA (Knoxville MSA) and the Nashville-Davidson-Murfreesboro-Franklin, TN MSA (Nashville MSA). Refer to the table in appendix A for a list of counties reviewed.

As of year-end 2024, the bank operated 40 branches and 45 deposit-taking ATMs in this rating area. The bank had $3.8 billion in adjusted deposits in this rating area, which represented 2.3 percent of the bank's total adjusted deposits. This rating area was the bank's eighth largest in terms of deposits held. During the evaluation period, the bank made $894.3 million or 3.3 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this rating area.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked seventh out of 70 FDIC-insured depository institutions with a 3.8 percent deposit market share in this rating area. The top three competitors had 46.9 percent of the market share and included Pinnacle Bank with 35 branches and 21.6 percent deposit market share, Bank of America, N.A. with 34 branches and 13.7 percent deposit market share, and Regions Bank with 71 branches and 11.6 percent deposit market share.

Nashville MSA AA

The following tables provide a summary of the demographics, including housing and business information, for the Nashville MSA AA for each evaluation period.

Assessment Area- 2022-2023 Nashville MSA						
						2022 - 2023
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	327	5.81	23.55	36.70	31.19	2.75
Population by Geography	1,501,377	4.98	21.19	38.03	34.66	1.14
Housing Units by Geography	599,814	5.41	22.53	37.96	33.08	1.01
Owner-Occupied Housing by Geography	347,233	2.30	16.64	40.48	40.05	0.54
Occupied Rental Units by Geography	206,902	10.24	31.84	34.52	21.74	1.65
Vacant Units by Geography	45,679	7.25	25.09	34.43	31.51	1.72
Businesses by Geography	73,391	4.02	20.43	29.12	43.53	2.90
Farms by Geography	2,017	2.28	16.36	36.64	43.38	1.34
Family Distribution by Income Level	351,777	19.91	17.06	20.84	42.19	0.00
Household Distribution by Income Level	554,135	21.59	17.13	18.71	42.57	0.00
Unemployment rate (%)	4.09	7.05	5.16	4.48	2.54	4.63
Households Below Poverty Level (%)	10.63	28.98	16.14	8.89	5.77	19.40
Median Family Income (34980 - Nashville-Davidson--Murfreesboro--Franklin, TN MSA)		$83,085	**Median Housing Value**			$246,500
Median Family Income (34980 - Nashville-Davidson--Murfreesboro--Franklin, TN MSA) for 2023		$100,500	**Median Gross Rent**			$1,162
			Families Below Poverty Level			7.88
FFIEC File - 2020 Census						
2023 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

Assessment Area - 2024 Nashville MSA						
						2024
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	348	5.75	23.56	38.22	29.60	2.87
Population by Geography	1,602,351	4.96	21.19	40.01	32.66	1.18
Housing Units by Geography	638,288	5.48	22.65	39.51	31.31	1.05
Owner-Occupied Housing by Geography	372,478	2.43	17.25	42.20	37.48	0.63
Occupied Rental Units by Geography	216,820	10.27	31.37	35.66	21.11	1.59
Vacant Units by Geography	48,990	7.42	25.19	36.05	29.51	1.82
Businesses by Geography	72,295	4.24	20.38	31.73	40.68	2.97
Farms by Geography	2,087	2.25	18.45	38.52	39.15	1.63

Family Distribution by Income Level	376,769	19.73	17.04	20.78	42.45	0.00
Household Distribution by Income Level	589,298	21.58	17.00	18.78	42.64	0.00
Unemployment rate (%)	4.07	6.77	5.15	4.37	2.60	4.33
Households Below Poverty Level (%)	10.57	28.33	16.15	8.69	5.74	18.36
Median Family Income (34980 - Nashville-Davidson--Murfreesboro--Franklin, TN MSA)		$81,652	**Median Housing Value**			$243,700
Median Family Income (34980 - Nashville-Davidson--Murfreesboro--Franklin, TN MSA) for 2024		$101,700	**Median Gross Rent**			$1,139
			Families Below Poverty Level			7.85
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

For 2022-2023, the Nashville MSA AA consisted of Davidson, Rutherford, Sumner, and Williamson counties. For 2024, the Nashville MSA AA consisted of Davidson, Maury, Rutherford, Sumner, and Williamson counties. The bank opened a branch in Maury County on December 14, 2023, adding Maury County to the bank's AA in 2024. As of year-end 2024, the bank operated 38 branches and 43 deposit-taking ATMs in this AA.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, the bank ranked seventh out of 57 FDIC-insured depository institutions with a 4.4 percent deposit market share in this AA. The top three competitors had 51.1 percent of the market share and included Pinnacle Bank with 30 branches and 23.5 percent deposit market share, Bank of America, N.A. with 31 branches and 15.9 percent deposit market share, and Regions Bank with 55 branches and 11.7 percent deposit market share.

In the performance context, examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would range between $1,308 and $1,323. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Based on the 2023 and 2024 median family income, respectively, the calculated maximum affordable monthly mortgage payment ranged between $1,256 and $1,271 for a low-income borrower and between $2,010 and $2,034 for a moderate-income borrower, depending on the MD. Based on these calculations, housing was affordable for moderate-income borrowers, but low-income borrowers would be challenged to qualify for and afford home mortgage financing in this AA.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For this AA, 7.9 percent of families were living below the poverty level.

Economic Data

Data from the August 2024 Moody's Analytics report indicates the Nashville economy is growing. Nashville continues to experience net migration flow into the metro. Job growth, driven by healthcare and government jobs, is above state and national averages. The recent decline in office-based employment has stabilized, though consumer services like leisure/hospitality and retail have plateaued. The job market remains tight. Transportation equipment manufacturing accounts for nearly one third of the metro's factory workforce. The jobless rate is near a record low. Major employers include Vanderbilt University Medical Center, HCA Inc., Nissan North America Inc., Saint Thomas Health Services, and Amazon. Housing affordability remains a significant issue, with housing prices rising and prices near a three-decade high. Residential real estate is among the most overvalued in the country. Area strengths include favorable business tax structure, strong demographics, and a large concentration of prime-age workers. Weaknesses include decreasing affordability within Tennessee, a low concentration of innovative technology producing industries, and above-average employment volatility.

According to the BLS, the non-seasonally adjusted unemployment rate for the Nashville MSA was 3 percent as of January 2022 and remained stable at 3 percent as of December 2024. The national unemployment rate was 3.9 percent as of December 2024.

Community Contacts

Examiners reviewed information from five community contact interviews conducted during the evaluation period. The contacts represented organizations focused on affordable housing, revitalization, small business and economic development, and community development. One of the organizations was a CDFI. The predominant need identified was affordable housing. However, the biggest challenge to building and providing additional affordable housing is the lack of land. One contact stated homeownership affordability is becoming a challenge in the city as the price of housing has increased significantly but incomes have not increased at the same pace. Further, it has become more competitive to keep housing affordable as individuals, investors, CDFIs, and nonprofits are competing to buy homes to maximize profits. Naturally occurring affordable housing (NOAH) is drying up as older complexes that were previously NOAH are being sold and renovated by mostly out of state investors and cash buyers and converting them to higher, more market-rate rents. One contact indicated there are limited CRA opportunities due to the minimal affordable housing and the lack of land to build additional affordable housing. These sources identified the following needs and opportunities within the community:

- Grants for a financial planning program for low- and moderate-income individuals
- Creation of a money management program
- Grants for a new home improvement program
- Improving financial literacy programs to include education on creating and protecting wealth and assets
- Funding to assist eligible not-for-profit agencies to purchase property to provide housing for low-income residents

- Affordable home mortgage products and housing assistance for low-income, first-time homebuyers
- Homebuyer education and counseling
- An affordable second mortgage to assist with the initial cost of purchasing a home
- Financial counseling and literacy classes that are tailored to the individuals
- Small dollar lending for consumers
- Financial counselors that can help complete online applications
- Small business lending
- Financial education on obtaining a small business loan

Scope of Evaluation in Tennessee

Examiners selected one AA for a full-scope review. Examiners conducted a full-scope review of the Nashville MSA AA as it is the largest AA in the state of Tennessee in terms of deposits, branches, and lending activity. The Knoxville MSA AA received a limited-scope review. Refer to the table in appendix A for more information.

Examiners based their ratings primarily on the results of the areas that received the full-scope reviews and the bank's performance in the limited-scope areas, as applicable. The Nashville MSA AA was the most heavily weighted when arriving at the overall conclusion for the state of Tennessee.

Examiners placed more emphasis on home mortgage loans than small loans to businesses in arriving at the overall conclusion for all AAs in the rating area as they represented the majority of lending in all AAs. The bank originated or purchased too few small loans to farms in this rating area to conduct a meaningful analysis.

On December 13, 2024, FTB opened a branch in Robertson County, which is part of the Nashville MSA AA. Robertson County will not be included in the AA or the evaluation because the bank entered this county less than six months before the end of the evaluation period and the analysis would not be meaningful.

Bank delineated AAs located in the same MSA are combined, analyzed, and presented as one AA for purposes of this evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TENNESSEE

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Nashville MSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Table 3: Lending Activity **2022 - 2024**

Number of Loans

Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Nashville MSA	2,522	429	3	14	-	2,968	92.40	94.91
Knoxville MSA	201	42	0	0	-	243	7.57	5.09
Broader Statewide or Regional Area	0	0	0	1	-	1	0.03	NA
Total	**2,723**	**471**	**3**	**15**	**-**	**3,212**	**100.00**	**100.00**

Dollar Volume of Loans ($000s)

Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Nashville MSA	769,216	70,203	273	84,682	-	924,374	94.22	94.91
Knoxville MSA	48,140	6,434	0	0	-	54,574	5.56	5.09
Broader Statewide or Regional Area	0	0	0	2,143	-	2,143	0.22	NA
Total	**817,356**	**76,637**	**273**	**86,825**	**-**	**981,091**	**100.00**	**100.00**

Source: 1/1/2022 - 12/31/2024 Bank Data.

Due to rounding, totals may not equal 100.0%

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

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked seventh out of 57 FDIC-insured depository institutions (top 12 percent) with a 4.4 percent deposit market share.

For home mortgage loans, the bank's market share of 1.4 percent ranked 17th out of 763 lenders (top 3 percent). The top three lenders were PennyMac Loan Services LLC with 4.1 percent market share, Rocket Mortgage with 3.9 percent market share, and Pinnacle Bank with 3.5 percent market share.

For small loans to businesses, the bank's market share of 0.3 percent ranked 21st out of 192 lenders (top 11 percent). The top three lenders were American Express National Bank with 25.3 percent market share, JPMorgan Chase Bank, N.A. with 22.4 percent market share, and Bank of America, N.A. with 9.5 percent market share. The top small business lenders were institutions with large business credit card portfolios with average loan sizes of $18,000 or less. FTB's average small business loan size was $145,000.

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AAs. The distribution of home mortgage loans was adequate and the distribution of small loans to businesses was good.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans was adequate.

2022-2023
The geographic distribution of home mortgage loans during the 2022-2023 analysis period was poor. The percentage of home mortgage loans originated or purchased in low-income geographies was below the percentage of owner-occupied housing units located in those geographies and was well below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies was well below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

2024
The geographic distribution of home mortgage loans during the 2024 analysis period was excellent. The percentage of home mortgage loans originated or purchased in low-income geographies exceeded the percentage of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in moderate-income geographies exceeded the percentage of owner-occupied housing units located in those geographies.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was good.

2022-2023
The geographic distribution of small loans to businesses during the 2022-2023 analysis period was good. The percentage of small loans to businesses originated or purchased in low-income geographies was below both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies was near to both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

2024

The geographic distribution of small loans to businesses during the 2024 analysis period was excellent. The percentage of small loans to businesses originated or purchased in low-income geographies exceeded the percentage of businesses located in those geographies. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded the percentage of businesses located in those geographies.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AA. Examiners did not identify any unexplained conspicuous gaps in the full-scope AA reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution. The distribution of home mortgage loans was excellent and the distribution of loans to businesses of different sizes was good.

Home Mortgage Loans

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

The distribution of home mortgage loans among individuals of different income levels was excellent.

2022-2023

The distribution of home mortgage loans among individuals of different income levels during the 2022-2023 analysis period was excellent. The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below the percentage of those families in the AA but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate percentage of all reporting lenders.

While the percentage of home mortgage to low-income borrowers was significantly below the percentage of low-income families in the AA, based on housing affordability calculations, low-income borrowers would be challenged to afford a home mortgage loan. Therefore, additional consideration was given to the bank's lending compared to aggregate.

2024

The distribution of home mortgage loans among individuals of different income levels during the 2024 analysis period was good. The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below the percentage of those families in the AA.

The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded the percentage of those families in the AA.

As noted above, based on housing affordability calculations, low-income borrowers would be challenged to afford a home mortgage loan in the AA. As aggregate data was not available at the time of this evaluation, examiners placed more emphasis on performance to moderate-income borrowers given this performance context.

Small Loans to Businesses

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

The distribution of loans to businesses of different sizes was good.

2022-2023
The distribution of loans to businesses of different sizes during the 2022-2023 analysis period was good. The percentage of loans to small businesses originated or purchased was below the percentage of small businesses in the AA but exceeded the aggregate percentage of all reporting lenders.

2024
The distribution of loans to businesses of different sizes during the 2024 analysis period was good. The percentage of loans to small businesses originated or purchased was near to the percentage of small businesses in the AA.

Community Development Lending

The institution was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.

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

The level of CD lending was excellent. During the evaluation period, FTB originated 14 CD loans totaling $84.7 million or 18.5 percent of allocated tier 1 capital. By dollar volume, 56.7 percent funded economic development, 24.3 percent funded affordable housing, 9.5 percent funded community services, and 9.5 percent funded revitalization and stabilization efforts. CD loans were responsive to identified community needs including affordable housing and economic development. The following are examples of CD loans the bank originated or purchased in the AA:

- A $12 million construction bridge loan, with 9 percent LIHTC equity, to finance the demolition of an existing building and the new construction of 46 housing units for households earning less than 80 percent of the area median income.

- An $8.6 million loan to finance the development of 34 units of affordable housing in Murfreesboro. The project involves the demolition of a 1960 public housing building and the new construction of 14 single-family homes and 20 duplex units. A total of 27 units will be restricted to 80 percent of the area median income. The bank demonstrated a multifaceted approach by also making a $9.4 million equity investment.

- A $30 million loan to a Small Business Investment Company, with $2.1 million benefiting the Nashville AA. The fund supports small businesses throughout the bank's footprint and nationwide.

Broader Statewide or Regional area

In addition, the bank made one CD loan totaling $2.1 million in the BSRA whose purpose, mandate, or function did not include serving the bank's AA. The BSRA lending supported the Lending Test rating.

Product Innovation and Flexibility

The institution made limited us of innovative and/or flexible lending practices to serve AA credit needs. The bank originated or purchased 287 loans under its flexible lending programs totaling $68 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for details regarding the programs offered.

Conclusions for Area Receiving a Limited-Scope Review

Refer to Tables 7 through 10 in the state of Tennessee section of appendix D for the facts and data that support the limited-scope conclusions.

Based on a limited-scope review, the bank's performance under the Lending Test in the Knoxville MSA AA was weaker than the bank's overall performance under the Lending Test in the full-scope area. The weaker performance was due to the lack of CD lending and weaker borrower distribution and lending activity. Performance in the limited-scope AA had a minimal impact on the overall state rating.

INVESTMENT TEST

The bank's performance under the Investment Test in Tennessee is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Nashville MSA AA was excellent.

Table 4: Qualified Investments*										
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Nashville MSA	7	26,391	45	19,544	52	86.67	45,935	82.86	0	0
Knoxville MSA	1	5,891	5	1,219	6	10.00	7,110	12.83	0	0
Broader Statewide or Regional Area	2	2,392	0	0	2	3.33	2,392	4.31	0	0
Total	10	34,674	50	20,763	60	100.00	55,437	100.00	0	0

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

The institution had an excellent level of qualified investments, including grants, but not in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current and prior period investments represented 10 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community development needs. Investments were particularly responsive to affordable housing needs. The institution did not use innovative and/or complex investments to support CD initiatives. By dollar volume during the current period, 97.6 percent of total investments and grants supported affordable housing, 2.1 percent supported community services to low- and moderate-income individuals, and 0.3 percent promoted economic development. The following are examples of qualified investments in the AA:

- The bank made a $9.4 million investment in a multi-investor LIHTC fund to construct 34 affordable housing units comprised of 14 single family homes and 20 duplex units. The bank demonstrated a multifaceted approach by also providing $8.6 million in financing.

- The bank made a $8 million investment in a multi-investor LIHTC fund for the construction of 311 affordable housing units.

- The bank made a $1.6 million investment in a multi-investor LIHTC fund for affordable housing.

Broader Statewide or Regional Area

In addition, the bank made two investments during the prior period with a remaining book value of $2.4 million in projects or organizations in the BSRA whose purpose, mandate, or function included serving the bank's AA. The BSRA investments supported the overall Investment Test rating.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Knoxville MSA AA was consistent with the bank's overall performance under the Investment

Test in the full-scope area. Performance in the limited-scope AA had minimal impact on the overall state rating.

SERVICE TEST

The bank's performance under the Service Test in Tennessee is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Nashville MSA AA was excellent.

Retail Banking Services

Table 5: Distribution of Branch Delivery Systems													2022 - 2024
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Nashville MSA*	94.91	38	95.00	2.63	18.42	28.95	47.37	2.63	4.96	21.19	40.01	32.66	1.18
Knoxville MSA	5.09	2	5.00	0.00	0.00	0.00	100.00	0.00	7.82	11.43	38.13	40.01	2.61
Total	100.00	40	100.00	2.60	18.18	27.27	49.35	2.60	5.35	19.55	39.19	34.56	1.35
Source: FFIEC File - 2024 Census													
1/1/2022 - 12/31/2024 Bank Data													
Due to rounding, totals may not equal 100.0%													
**# of Bank Branches does not include branch opened in December 2024 in Robertson County*													

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

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income geographies was below, and in moderate-income geographies approximated, the percentage of the population living within those geographies. Examiners further considered four middle- or upper-income adjacent branches that were within 1,000 feet of low- or moderate-income geographies within the AA. These branches improved accessibility and had a positive impact on the retail Service Test conclusion.

The bank had several ADS including ATMs, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers and were positively considered in the service delivery systems conclusion. The bank had 47 ATMs in the AA, 43 of which were deposit-taking. Per data provided by the bank, as of the end of the evaluation period, bank customers located in low- and moderate-income geographies used online banking at a rate (46.5 percent) greater than customers in middle- and upper-income geographies (44.3 percent). Mobile banking usage rates amongst customers in low- and moderate-income geographies (59.3 percent) were also higher than that of customers in middle- and upper-income geographies (52.2 percent). During the evaluation period, online banking usage increased 0.6 percent for customers located in low- and moderate-income geographies and increased 11.6 percent for customers in middle- and upper-income

geographies. Mobile banking usage decreased 8.8 percent for customers located in low- and moderate-income geographies and increased 12.3 percent for customers in middle- and upper-income geographies.

Table 6: Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Nashville MSA*	2	2	0	0	1	-1	0
Knoxville MSA	0	0	0	0	0	0	0
Total	2	2	0	0	1	-1	0
1/1/2022 - 12/31/2024 Bank Data.							
**# of Branch Openings does not include one branch opened in December 2024 in Robertson County*							

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

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, the bank closed two branches, neither of which were in low- or moderate-income geographies. The branch closures were a result of low productivity and nearby branch overlap. The bank also opened two branches during the evaluation period, neither of which were in low- or moderate-income geographies.

Services, including where appropriate, business hours did not vary in a way that inconvenienced its AA, particularly low- and moderate-income geographies and/or individuals. The bank maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. Average hours of operation for branches in low- and moderate-income geographies were comparable to those branches in middle- and upper-income geographies. The downtown Nashville branch was open from 8:00 am to 5:00 pm Monday through Friday. The remaining 37 branches in the AA (including all low- and moderate-income branches) had lobby hours of 9:00 a.m. to 5:00 p.m. Monday through Thursday, and 9:00 a.m. to 6:00 p.m. on Friday. There were 36 branches open from 9:00 a.m. to 12:00 p.m. on Saturdays, including all but one moderate-income branch. There were 36 locations with drive-thru facilities, which included all branches in low- and moderate-income geographies.

Community Development Services

The institution provided a relatively high level of CD services. During the evaluation period, bank employees provided 868 hours of qualified CD service activities to 23 organizations within this AA. Leadership is evident through board or committee participation, with 10 employees providing 404 service hours to 13 organizations. Additionally, the bank hosted 14 eBus and Banking to Go events during the evaluation period in the Nashville MSA benefiting 605 individuals. The bank's assistance was responsive to an identified need in the AA, primarily financial literacy and affordable housing. Service activity examples during the evaluation period include:

- Two bank employees provided 72 hours of board services for a nonprofit residential reentry organization. The organization provides housing and basic needs, health and well-being services, life skills training and development, and legal support to men returning to the community from state correctional facilities and county jails.

- Two bank employees provided 74 hours of board services for a community service organization that assists low- and moderate-income families, seniors, and people facing an unexpected crisis to avoid homelessness and stay in their homes.

- A bank employee provided 33 hours of financial education to a nonprofit affordable housing organization. The organization provides a range of services to low-income individuals and families, including homebuyer education, mortgage lending, and home ownership opportunities.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's retail service delivery system performance under the Service Test in the Knoxville MSA AA was weaker than the bank's overall retail service delivery system performance in the full-scope area due to weaker branch distribution. Performance differences in the limited-scope AA had minimal impact on the overall state rating.

State of West Virginia

CRA rating for the State of West Virginia: Satisfactory
The Lending Test is rated: Low Satisfactory
The Investment Test is rated: Outstanding
The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflected good responsiveness to AA credit needs.
- The bank exhibited an adequate geographic distribution of loans in its AA.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses of different sizes.
- The institution did not originate CD loans in the AA. CD lending had a negative impact on the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments and grants which were responsive in addressing community needs.
- Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the institution's AA with consideration for middle- and upper-income proximate branches and ADS.
- The bank provided an adequate level of CD services. CD services were responsive in addressing community needs.

Description of Institution's Operations in West Virginia

The state of West Virginia consists of one AA, which is a portion of the Charleston, WV MSA (Charleston MSA). Refer to the table in appendix A for a list of counties reviewed.

As of year-end 2024, the bank operated two branches and two deposit-taking ATMs in this rating area. The bank had $126.3 million in deposits in this rating area, which represented 0.1 percent of the bank's total adjusted deposits. This rating area was the bank's 17th largest in terms of deposits held. During the evaluation period, the bank made $34.4 million or 0.1 percent of its total dollar volume of home mortgage loans and small loans to businesses in this rating area.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked ninth out of 12 FDIC-insured depository institutions with a 1.8 percent deposit market share in this rating area. The top three competitors had 64.1 percent of the market share and included Truist Bank with seven branches and 28.5 percent deposit market share, United Bank with four branches and 22.4 percent deposit market share, and City National Bank of West Virginia with 11 branches and 13.2 percent deposit market share.

Charleston MSA AA

The following table provides a summary of the demographics, including housing and business information, for the Charleston MSA AA.

Assessment Area - FS - Charleston WV MSA						
						2022 - 2024
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	57	1.75	14.04	57.89	22.81	3.51
Population by Geography	180,745	0.72	12.02	58.15	26.61	2.51
Housing Units by Geography	92,339	0.69	12.06	59.17	25.30	2.78
Owner-Occupied Housing by Geography	54,908	0.34	10.61	58.97	27.55	2.52
Occupied Rental Units by Geography	23,229	1.26	14.06	59.59	21.92	3.18
Vacant Units by Geography	14,202	1.12	14.39	59.25	22.12	3.12
Businesses by Geography	6,982	0.85	10.83	48.21	38.73	1.39
Farms by Geography	172	1.16	6.40	58.72	28.49	5.23
Family Distribution by Income Level	47,230	22.56	16.01	19.63	41.79	0.00
Household Distribution by Income Level	78,137	24.66	14.94	17.03	43.38	0.00
Unemployment rate (%)	5.69	10.66	8.04	5.56	4.80	7.75
Households Below Poverty Level (%)	16.81	42.38	21.46	17.13	10.78	41.74
Median Family Income (16620 - Charleston, WV MSA)		$60,851			**Median Housing Value**	$105,800
Median Family Income (16620 - Charleston, WV MSA) for 2024		$74,800			**Median Gross Rent**	$736
					Families Below Poverty Level	13.28
FFIEC File - 2020 Census						
FFIEC File - 2024 Census 2024 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

The Charleston MSA AA consisted of Kanawha County.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, the bank ranked ninth out of 12 FDIC-insured depository institutions with a 1.8 percent deposit market share in this AA. The top three competitors had 64.1 percent of the market share and included Truist Bank with seven branches and 28.5 percent deposit market share, United Bank with four branches and 22.4 percent deposit market share, and City National Bank of West Virginia with 11 branches and 13.2 percent deposit market share.

In the performance context, examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be $568. One method used to determine housing affordability assumes a

maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Based on the 2024 median family income, the calculated maximum affordable monthly mortgage payment was $935 for a low-income borrower and $1,496 for a moderate-income borrower. Based on these calculations, housing was affordable for both low- and moderate-income borrowers. Community contacts (see below) noted affordable housing continues to be a community need despite these calculations.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For this AA, 13.3 percent of families were living below the poverty level.

Economic Data

Data from the April 2024 Moody's Analytics report indicates that the Charleston economy continues to struggle. Employment is on par with pre-pandemic levels; however, it is notably weaker than the region and nation. The main industries are mining/construction and government. Charleston's economic structure is heavily reliant on coal mining, a sector that has significantly contracted. The coal industry has not rebounded from pandemic-related losses and faces competition from cheaper and cleaner energy sources like natural gas. The public sector, particularly state government, is a substantial part of Charleson's economy due to its role as West Virginia's state capital. While state government employment has stabilized since filling the positions vacated during the pandemic, additional hiring is not expected in the future. Major employers include Charleston Area Medical Center, Herbert J. Thomas Memorial Hospital Association, Frontier Communications, Walmart Inc., and Dow Chemical Co. Area strengths include low business and living costs and below-average employment volatility. Charleston faces significant demographic challenges, with the population declining nearly every year since 1980. The 2023 population decrease was severe, ranking among the top declines nationally. The senior citizen population has been the only age cohort to grow, but even that group's growth is below the national average. Other metro area weaknesses include a low quality of life and high poverty rate.

According to the BLS, the non-seasonally adjusted unemployment rate for the Charleston MSA was 4.7 percent as of January 2022 and decreased to 3.5 percent as of December 2024. The national unemployment rate was 3.9 percent as of December 2024.

Community Contacts

Examiners reviewed information from two community contact interviews conducted during the evaluation period. One contact focused on affordable housing and the other was with a local county commission that manages the county budget. Based on the interview notes, the community faces significant economic and housing challenges. These sources identified the following needs within the community:

- Affordable housing development, particularly replacement of aging and uninhabitable homes

- Demolition funding to remove deteriorated housing stock and improve community conditions
- Multifamily housing development and financing
- Down payment and mortgage support for low- and moderate-income households
- Non-traditional small business lending and greater access to capital for entrepreneurs
- Access to capital for small businesses
- Participation with local agencies that provide financial literacy and homebuyer education programs

Scope of Evaluation in West Virginia

Examiners conducted a full-scope review of the Charleston MSA AA, which is the only AA in the state of West Virginia.

Examiners based their ratings primarily on the results of the areas that received the full-scope review.

Examiners placed more emphasis on home mortgage loans than small loans to businesses in arriving at the overall conclusion as they represented the majority of lending in the AA. The bank did not originate or purchase small loans to farms in this rating area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WEST VIRGINIA

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

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

Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Table 3: Lending Activity								2022 - 2024
Number of Loans								
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Consumer**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Charleston MSA	165	44	0	0	-	209	100.00	100.00
Broader Statewide or Regional Area	0	0	0	0	-	0	NA	NA
Total	**165**	**44**	**0**	**0**	**-**	**209**	**100.00**	**100.00**
Dollar Volume of Loans ($000s)								
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Consumer**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Charleston MSA	22,689	11,699	0	0	-	34,388	100.00	100.00
Broader Statewide or Regional Area	0	0	0	0	-	0	NA	NA
Total	**22,689**	**11,699**	**0**	**0**	**-**	**34,388**	**100.00**	**100.00**
Source: 1/1/2022 - 12/31/2024 Bank Data.								
Due to rounding, totals may not equal 100.0%								

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

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, FTB ranked ninth out of 12 FDIC-insured depository institutions (top 75 percent) with a 1.8 percent deposit market share.

For home mortgage loans, the bank's market share of 1.5 percent ranked 21st out of 143 lenders (top 15 percent). The top three lenders were City National Bank of West Virginia with 13.1 percent market share, Rocket Mortgage with 5.9 percent market share, and The Poca Valley Bank with 5.3 percent market share.

For small loans to businesses, the bank's market share of 0.7 percent ranked 17th out of 67 lenders (top 26 percent). The top three lenders were American Express National Bank with 23.2 percent market share, JPMorgan Chase Bank, N.A. with 11.8 percent market share, and Synchrony Bank with 8.3 percent market share. The top small business lenders were institutions with large business credit card portfolios with average loan sizes of $13,000 or less. FTB's average small business loan size was $257,000.

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AA. The geographic distribution of home mortgage loans was adequate and the geographic distribution of small loans to businesses was poor.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans was adequate. The percentage of home mortgage loans originated or purchased in low-income geographies exceeded both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies was well below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was poor. The bank did not originate or purchase any small business loans in low-income geographies; however, only 0.9 percent of businesses were in low-income census tracts. The percentage of small loans to businesses originated or purchased in moderate-income geographies was well below both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AA. Examiners did not identify any unexplained conspicuous gaps in the full-scope AA reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution. The distribution of home mortgage loans was good and the distribution of small loans to businesses was adequate.

Home Mortgage Loans

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

The distribution of home mortgage loans among individuals of different income levels was good. The percentage of home mortgage loans originated or purchased to low-income borrowers was well below the percentage of those families in the AA but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to

moderate-income borrowers exceeded the percentage of those families in the AA but was below the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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

The distribution of loans to businesses of different sizes was adequate. The percentage of loans to small businesses originated or purchased was well below the percentage of small businesses in the AA but approximated the aggregate percentage of all reporting lenders.

Community Development Lending

The institution made few, if any, CD loans. CD lending had a negative impact on the Lending Test conclusion.

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

The level of CD lending was very poor. During the evaluation period, FTB originated no CD loans. The bank was not responsive to identified community credit needs.

Product Innovation and Flexibility

The institution used innovative and/or flexible lending practices in order to serve AA credit needs. The bank originated or purchased 21 loans under its flexible lending programs totaling $7.4 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for details regarding the programs offered.

INVESTMENT TEST

The bank's performance under the Investment Test in West Virginia is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Charleston MSA AA was excellent.

Table 4: Qualified Investments*										
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Charleston MSA	9	851	4	2,100	13	86.67	2,951	69.26	0	0
Broader Statewide or Regional Area	2	1,310	0	0	2	13.33	1,310	30.74	0	0
Total	11	2,161	4	2,100	15	100.00	4,261	100.00	0	0

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

The institution had an excellent level of qualified investments, including grants, but not in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current and prior period investments represented 18.3 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community development needs. Investments were particularly responsive to affordable housing needs. The institution did not use innovative and/or complex investments to support CD initiatives. By dollar volume during the current period, 99 percent of total investments and grants supported affordable housing and 1 percent supported community services to low- and moderate-income individuals. The following are examples of qualified investments in the AA:

- The bank made a responsive $2.1 million investment in a multi-investor LIHTC fund for a 40-unit affordable housing project.

- The bank made two grants totaling $10,000 to support a foundation providing health services primarily to low- and moderate-income individuals. This grant was responsive to a need identified by the bank for health services for low- and moderate-income individuals.

- There were nine responsive investments made by the bank prior to 2022 which had a remaining book value of $850,653. All nine were LIHTC investments for affordable housing.

Broader Statewide or Regional Area

In addition, the bank made two investments during the prior period with a remaining book value of $1.3 million in projects or organizations in the BSRA whose purpose, mandate, or function included serving the bank's AA. The bank was responsive to the community development investment needs in the Charleston MSA AA, therefore, BSRA investments were considered and further supported the overall Investment Test conclusion.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

Table 5: Distribution of Branch Delivery Systems													2022 - 2024
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Charleston MSA	100.00	2	100.00	0.00	0.00	50.00	50.00	0.00	0.72	12.02	58.15	26.61	2.51
Total	100.00	2	100.00	0.00	0.00	50.00	50.00	0.00	0.72	12.02	58.15	26.61	2.51
Source: FFIEC File - 2024 Census *1/1/2022 - 12/31/2024 Bank Data* *Due to rounding, totals may not equal 100.0%*													

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

Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the institution's AA. The bank did not have any branches in low- or moderate-income geographies. However, examiners considered the low volume of branches in the AA. Examiners further considered one upper-income branch that was in close proximity to both low- and moderate-income geographies and served customers residing in those areas as demonstrated by bank customer usage data. This branch improved accessibility and had a positive impact on the retail Service Test conclusion.

The bank had several ADS including ATMs, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers and were positively considered in the service delivery systems conclusion. The bank had two ATMs in the AA, both of which were deposit-taking. Per data provided by the bank, as of the end of the evaluation period, customers located in low- and moderate-income geographies used online banking at a rate (43.9 percent) slightly less than customers in middle- and upper-income geographies (45.4 percent). Similarly, mobile banking usage rates amongst customers in low- and moderate-income geographies (56.1 percent) were lower than that of customers in middle- and upper-income geographies (60.6 percent). During the evaluation period, online banking usage increased 15.1 percent for customers located in low- and moderate-income geographies and 4.6 percent for customers in middle- and upper-income geographies. Mobile banking usage decreased 0.6 percent for customers in low- and moderate-income geographies and increased 7 percent for customers in middle- and upper-income geographies.

Table 6: Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Charleston MSA	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0
Total							
1/1/2022 - 12/31/2024 Bank Data.							

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

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly low- and moderate-income geographies and/or individuals. The bank maintained standard business hours and offered traditional banking products and services at both branch locations in the AA. Both AA branches had the same lobby hours of 9:00 a.m. to 5:00 p.m. Monday through Thursday. On Fridays, the downtown branch location was open from 9:00 a.m. to 5:00 p.m., while the other branch location was open from 9:00 a.m. to 6:00 p.m. Of the two branches in the AA, one was open on Saturday, from 9:00 a.m. to 12:00 p.m. Both branch locations had drive-thru facilities.

Community Development Services

The institution provided an adequate level of CD services. During the evaluation period, bank employees provided 40 hours of qualified CD service activities to two organizations within this AA. The bank's assistance was responsive to a need for financial literacy, including homebuyer education. Service activity examples during the evaluation period include:

- A bank employee volunteered 10 service hours providing financial education at a local university that offers TRIO programs supporting low-income and first-generation students navigate and succeed in higher education.

- Bank employees provided 30 hours of financial education to clients of a local affordable housing organization on topics including credit building, budgeting, and ways to achieve and maintain homeownership.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term "full-scope," and those that received a less comprehensive review, designated by the term "limited-scope."

Time Period Reviewed:	01/01/22 to 12/31/24	
Bank Products Reviewed:	Home mortgage, small business, small farm, community development loans, qualified investments, community development services	
Affiliates	**Affiliate Relationship**	**Products Reviewed**
Fifth Third Community Development Corporation	Affiliate	Qualified investments
Fifth Third Community Development Company, LLC	Subsidiary	Qualified investments
Fifth Third Foundation	Subsidiary	Qualified investments (grants/donations)
Fifth Third Chicagoland Foundation	Subsidiary	Qualified investments (grants/donations)
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	**Type of Exam**	**Other Information**
MMSAs		
2024: 16740 Charlotte-Concord-Gastonia, NC-SC MMSA (Charlotte MMSA)	Full-Scope	NC: Cabarrus, Iredell, Lincoln, Mecklenburg, Rowan, and Union SC: Lancaster
2022-2023: 16980 Chicago-Naperville-Elgin, IL-IN-WI MMSA (Chicago MMSA)	Full-Scope	IL: Cook, DeKalb, Du Page, Kane, Kendall, Lake, McHenry, and Will IN: Jasper, Lake, and Porter
2024: 16980 Chicago-Naperville-Elgin, IL-IN MMSA (Chicago MMSA)	Full-Scope	IL: Cook, DeKalb, Du Page, Kane, Kendall, Lake, McHenry, and Will IN: Jasper, Lake, and Porter
17140 Cincinnati, OH-KY-IN MMSA (Cincinnati MMSA)	Full-Scope	IN: Dearborn KY: Boone, Campbell, Grant, Kenton, and Pendleton OH: Brown, Butler, Clermont, Hamilton, and Warren
2022-2023: 21780 Evansville, IN-KY MMSA (Evansville MMSA)	Full-Scope	IN: Posey, Vanderburgh, and Warrick KY: Henderson
26580 Huntington-Ashland, WV-KY-OH MMSA (Huntington MMSA)	Full-Scope	KY: Boyd WV: Cabell, Putnam, and Wayne
31140 Louisville/Jefferson County, KY-IN MMSA (Louisville MMSA)	Full-Scope	IN: Clark and Floyd KY: Jefferson, Oldham, and Shelby
43780 South Bend-Mishawaka, IN-MI MMSA (South Bend MMSA)	Full-Scope	IN: St. Joseph MI: Cass
State		
FLORIDA		

15980 Cape Coral-Fort Myers, FL MSA (Cape Coral MSA)	Limited-Scope	Lee
19660 Deltona-Daytona Beach-Ormond Beach, FL MSA (Deltona MSA)	Limited-Scope	Volusia
27260 Jacksonville, FL MSA (Jacksonville MSA)	Limited-Scope	Clay, Duval, and St. Johns
29460 Lakeland-Winter Haven, FL MSA (Lakeland MSA)	Limited-Scope	Polk
33100 Miami-Fort Lauderdale-West Palm Beach, FL MSA (Miami MSA)	Limited-Scope	Broward, Miami-Dade, and Palm Beach
34940 Naples-Marco Island, FL MSA (Naples MSA)	Full-Scope	Collier
35840 North Port-Bradenton-Sarasota, FL MSA (North Port MSA)	Limited-Scope	Manatee and Sarasota
36740 Orlando-Kissimmee-Sanford, FL MSA (Orlando MSA)	Limited-Scope	Lake, Orange, Osceola, and Seminole
2023-2024: 37340 Palm Bay-Melbourne-Titusville, FL MSA (Palm Bay MSA)	Limited-Scope	Brevard
39460 Punta Gorda, FL MSA (Punta Gorda MSA)	Limited-Scope	Charlotte
2022-2023: 45300 Tampa-St. Petersburg-Clearwater, FL MSA (Tampa MSA)	Full-Scope	Hillsborough, Pasco, and Pinellas
2024: 45300 Tampa-St. Petersburg-Clearwater, FL MSA (Tampa MSA)	Full-Scope	Hillsborough, Pasco, and Pinellas
GEORGIA		
2022-2023: 12060 Atlanta-Sandy Springs-Alpharetta, GA MSA (Atlanta MSA)	Full-Scope	Cobb, DeKalb, Fulton, Gwinnett, and Walton
2024: 12060 Atlanta-Sandy Springs-Roswell, GA MSA (Atlanta MSA)	Full-Scope	Cobb, DeKalb, Fulton, Gwinnett, and Walton
12260 Augusta-Richmond County, GA-SC MSA (Augusta MSA)	Limited-Scope	Columbia and Richmond
ILLINOIS		
2022-2023: 16060 Carbondale-Marion, IL MSA (Carbondale MSA)	Limited-Scope	Williamson
40420 Rockford, IL MSA (Rockford MSA)	Limited-Scope	Winnebago
2022-2023: IL non-MSA	Full-Scope	Effingham, Jefferson, Stephenson, and Whiteside
2024: IL non-MSA	Full-Scope	Effingham, Jefferson, Stephenson, Whiteside, and Williamson
INDIANA		
14020 Bloomington, IN MSA (Bloomington MSA)	Limited-Scope	Monroe
18020 Columbus, IN MSA (Columbus MSA)	Limited-Scope	Bartholomew
21140 Elkhart-Goshen, IN MSA (Elkhart MSA)	Limited-Scope	Elkhart
2024: 21780 Evansville, IN MSA (Evansville MSA)	Limited-Scope	Posey, Vanderburgh, and Warrick
23060 Fort Wayne, IN MSA (Fort Wayne MSA)	Limited-Scope	Allen
26900 Indianapolis-Carmel-Greenwood, IN MSA (Indianapolis MSA)	Full-Scope	Brown, Hamilton, Hancock, Hendricks, Johnson, Marion, Morgan, and Shelby
29200 Lafayette-West Lafayette, IN MSA (Lafayette MSA)	Limited-Scope	Tippecanoe
33140 Michigan City-La Porte, IN MSA (Michigan City MSA)	Limited-Scope	LaPorte
2022-2023: 45460 Terre Haute, IN MSA (Terre Haute MSA)	Limited-Scope	Parke, Sullivan, and Vigo
2024: 45460 Terre Haute, IN MSA (Terre Haute MSA)	Limited-Scope	Sullivan and Vigo
2022-2023: IN non-MSA	Limited-Scope	Adams, Decatur, Dubois, Fayette, Gibson, Knox, Perry, Ripley, Spencer, and Steuben
2024: IN non-MSA	Limited-Scope	Adams, Decatur, Dubois, Fayette, Gibson, Knox, Parke, Perry, Ripley, Spencer, and Steuben
KENTUCKY		

30460 Lexington-Fayette, KY MSA (Lexington MSA)	Full-Scope	Bourbon, Fayette, Jessamine, and Scott
36980 Owensboro, KY MSA (Owensboro MSA)	Limited-Scope	Daviess
2022-2023: KY non-MSA	Limited-Scope	Franklin, Harrison, Hopkins, Lyon, Madison, Mercer, and Union
2024: KY non-MSA	Limited-Scope	Franklin, Harrison, Henderson, Hopkins, Lyon, Madison, Mercer, and Union
MICHIGAN		
11460 Ann Arbor, MI MSA (Ann Arbor MSA)	Limited-Scope	Washtenaw
12980 Battle Creek, MI MSA (Battle Creek MSA)	Limited-Scope	Calhoun
13020 Bay City, MI MSA (Bay City MSA)	Limited-Scope	Bay
19820 Detroit-Warren-Dearborn, MI MSA (Detroit MSA)	Full-Scope	Livingston, Macomb, Oakland, St. Clair, and Wayne
22420 Flint, MI MSA (Flint MSA)	Limited-Scope	Genesee
24340 Grand Rapids-Wyoming-Kentwood, MI MSA (Grand Rapids MSA)	Full-Scope	Kent, Montcalm, and Ottawa
27100 Jackson, MI MSA (Jackson MSA)	Limited-Scope	Jackson
28020 Kalamazoo-Portage, MI MSA (Kalamazoo MSA)	Limited-Scope	Kalamazoo
2022-2023: 29620 Lansing-East Lansing, MI MSA (Lansing MSA)	Limited Scope	Clinton, Eaton, Ingham, and Shiawassee
2024: 29620 Lansing-East Lansing, MI MSA (Lansing MSA)	Limited-Scope	Clinton, Eaton, and Ingham
33220 Midland, MI MSA (Midland MSA)	Limited-Scope	Midland
33780 Monroe, MI MSA (Monroe MSA)	Limited-Scope	Monroe
34740 Muskegon-Norton Shores, MI MSA (Muskegon MSA)	Limited-Scope	Muskegon
35660 Niles, MI MSA (Niles MSA)	Limited-Scope	Berrien
40980 Saginaw, MI MSA (Saginaw MSA)	Limited-Scope	Saginaw
2024: 45900 Traverse City, MI MSA (Traverse City MSA)	Limited-Scope	Grand Traverse and Leelanau
2022-2023: MI non-MSA	Limited-Scope	Allegan, Antrim, Emmet, Grand Traverse, Hillsdale, Isabella, Leelanau, Mason, Mecosta, Missaukee, Newaygo, Oceana, Otsego, St Joseph, Van Buren, and Wexford
2024: MI non-MSA	Limited-Scope	Allegan, Antrim, Emmet, Hillsdale, Isabella, Mason, Mecosta, Missaukee, Newaygo, Oceana, Otsego, Shiawassee, St Joseph, Van Buren, and Wexford
NORTH CAROLINA		
11700 Asheville, NC MSA (Asheville MSA)	Limited-Scope	Buncombe
2022-2023: 16740 Charlotte-Concord-Gastonia, NC-SC MSA (Charlotte MSA)	Full-Scope	Cabarrus, Iredell, Lincoln, Mecklenburg, Rowan, and Union
20500 Durham-Chapel Hill, NC MSA (Durham MSA)	Limited-Scope	Durham and Orange
25860 Hickory-Lenoir-Morganton, NC MSA (Hickory MSA)	Limited-Scope	Catawba
39580 Raleigh-Cary, NC MSA (Raleigh MSA)	Full-Scope	Wake
NC non-MSA	Limited-Scope	Alleghany, Ashe, Avery, Cleveland, Rutherford, and Transylvania
OHIO		
10420 Akron, OH MSA (Akron MSA)	Limited-Scope	Portage and Summit
15940 Canton-Massillon, OH MSA (Canton MSA)	Limited-Scope	Stark
2022-2023: 17420 Cleveland, OH MSA (Cleveland MSA)	Limited-Scope	Cuyahoga, Geauga, Lake, Lorain, and Medina
2024: 17410 Cleveland, OH MSA (Cleveland MSA)	Limited-Scope	Cuyahoga, Geauga, Lake, Lorain, and Medina
18140 Columbus, OH MSA (Columbus MSA)	Full-Scope	Delaware, Fairfield, Franklin, Licking, Pickaway, and Union

19430 Dayton-Kettering-Beavercreek, OH MSA (Dayton MSA)	Full-Scope	Greene, Miami, and Montgomery
30620 Lima, OH MSA (Lima MSA)	Limited-Scope	Allen
2024: 41780 Sandusky, OH MSA (Sandusky MSA)	Limited-Scope	Erie
44220 Springfield, OH MSA (Springfield MSA)	Limited-Scope	Clark
45780 Toledo, OH MSA (Toledo MSA)	Limited-Scope	Fulton, Lucas, and Wood
2022-2023: OH non-MSA	Limited-Scope	Adams, Auglaize, Champaign, Clinton, Darke, Defiance, Erie, Fayette, Hancock, Highland, Logan, Marion, Preble, Ross, Sandusky, Scioto, Seneca, and Shelby
2024: OH non-MSA	Limited-Scope	Adams, Auglaize, Champaign, Clinton, Darke, Defiance, Fayette, Hancock, Highland, Logan, Marion, Preble, Ross, Sandusky, Scioto, Seneca, and Shelby
SOUTH CAROLINA		
2024: 16700 Charleston-North Charleston, SC MSA (Charleston MSA)	Limited-Scope	Charleston
24860 Greenville-Anderson-Greer, SC MSA (Greenville MSA)	Full-Scope	Greenville
2024: 43900 Spartanburg, SC MSA (Spartanburg MSA)	Limited-Scope	Spartanburg
TENNESSEE		
28940 Knoxville, TN MSA (Knoxville MSA)	Limited-Scope	Knox
2022-2023: 34980 Nashville-Davidson--Murfreesboro--Franklin, TN MSA (Nashville MSA)	Full-Scope	Davidson, Rutherford, Sumner, and Williamson
2024: 34980 Nashville-Davidson--Murfreesboro--Franklin, TN MSA (Nashville MSA)	Full-Scope	Davidson, Maury, Rutherford, Sumner, and Williamson
WEST VIRGINIA		
16620 Charleston, WV MSA (Charleston MSA)	Full-Scope	Kanawha

Appendix B: Summary of MMSA and State Ratings

RATINGS				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/ Multistate Rating
Fifth Third Bank N.A.	Outstanding	Outstanding	High Satisfactory	Outstanding
MMSA or State:				
Charlotte MMSA	Outstanding	Outstanding	Outstanding	Outstanding
Chicago MMSA	Outstanding	Outstanding	High Satisfactory	Outstanding
Cincinnati MMSA	Outstanding	Outstanding	Outstanding	Outstanding
Evansville MMSA	Outstanding	Outstanding	High Satisfactory	Outstanding
Huntington MMSA	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Louisville/ MMSA	Outstanding	Outstanding	High Satisfactory	Outstanding
South Bend MMSA	Outstanding	Outstanding	High Satisfactory	Outstanding
Florida	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Georgia	Outstanding	Outstanding	High Satisfactory	Outstanding
Illinois	Outstanding	Outstanding	Outstanding	Outstanding
Indiana	Outstanding	Outstanding	High Satisfactory	Outstanding
Kentucky	Outstanding	Outstanding	Low Satisfactory	Outstanding
Michigan	Outstanding	Outstanding	Outstanding	Outstanding
North Carolina	Outstanding	Outstanding	Outstanding	Outstanding
Ohio	Outstanding	Outstanding	High Satisfactory	Outstanding
South Carolina	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Tennessee	Outstanding	Outstanding	Outstanding	Outstanding
West Virginia	Low Satisfactory	Outstanding	Low Satisfactory	Satisfactory

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2 of this title, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (10) and (13) of this title.

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

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of CD loans and qualified investments, branch distribution, and CD services).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the "bank" include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased loans are treated the same as originations; and (2) "aggregate" is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA reporting lenders in the MMSA/AA. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

Table 7. **Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.

Table 8. **Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/AA. The table also presents aggregate peer data for the years the data is available.

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

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

Table 11. **Assessment Area Distribution of Loans to Farms by Income Category of the Geography –** Compares the percentage distribution of the number of small loans (less than or equal to $500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's AA.

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

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

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

Charlotte MMSA

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2024
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**
2024 Charlotte MMSA	1,079	278,599	100.00	--	2.14	4.45	--	24.23	27.90	--	33.31	31.42	--	39.86	35.77	--	0.47	0.46	--
Total	**1,079**	**278,599**	**100.00**	**--**	**2.14**	**4.45**	**--**	**24.23**	**27.90**	**--**	**33.31**	**31.42**	**--**	**39.86**	**35.77**	**--**	**0.47**	**0.46**	**--**

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

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2024
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Borrowers**			**Moderate-Income Borrowers**			**Middle-Income Borrowers**			**Upper-Income Borrowers**			**Not Available-Income Borrowers**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**
2024 Charlotte MMSA	1,079	278,599	100.00	--	20.85	11.21	--	17.45	19.83	--	19.46	24.93	--	42.24	42.08	--	--	1.95	--
Total	**1,079**	**278,599**	**100.00**	**--**	**20.85**	**11.21**	**--**	**17.45**	**19.83**	**--**	**19.46**	**24.93**	**--**	**42.24**	**42.08**	**--**	**--**	**1.95**	**--**

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

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2024
Assessment Area:	**Total Loans to Small Businesses**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**
2024 Charlotte MMSA	438	57,399	100.00	--	4.47	5.25	--	25.00	31.96	--	28.06	28.54	--	40.69	33.79	--	1.77	0.46	--
Total	**438**	**57,399**	**100.00**	**--**	**4.47**	**5.25**	**--**	**25.00**	**31.96**	**--**	**28.06**	**28.54**	**--**	**40.69**	**33.79**	**--**	**1.77**	**0.46**	**--**

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
2024 Charlotte MMSA	438	57,399	100.00	--	86.09	66.44	--	6.52	30.59	7.39	2.97
Total	**438**	**57,399**	**100.00**	**--**	**86.09**	**66.44**	**--**	**6.52**	**30.59**	**7.39**	**2.97**

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Chicago MMSA

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2023
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**
2022-2023 Chicago MMSA	9,752	2,192,908	100.00	420,109	4.44	2.64	4.32	18.06	14.07	16.69	37.47	36.97	37.39	39.70	45.98	41.26	0.33	0.35	0.33
Total	**9,752**	**2,192,908**	**100.00**	**420,109**	**4.44**	**2.64**	**4.32**	**18.06**	**14.07**	**16.69**	**37.47**	**36.97**	**37.39**	**39.70**	**45.98**	**41.26**	**0.33**	**0.35**	**0.33**

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

Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2024
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**
2024 Chicago MMSA	3,973	1,033,389	100.00	--	4.54	4.20	--	18.49	20.56	--	37.14	31.97	--	39.50	43.07	--	0.33	0.20	--
Total	**3,973**	**1,033,389**	**100.00**	**--**	**4.54**	**4.20**	**--**	**18.49**	**20.56**	**--**	**37.14**	**31.97**	**--**	**39.50**	**43.07**	**--**	**0.33**	**0.20**	**--**

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

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2022 - 2023**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
2022-2023 Chicago MMSA	9,752	2,192,908	100.00	420,109	22.81	12.19	9.36	16.65	24.04	21.68	19.33	24.09	21.43	41.21	35.89	30.66	--	3.79	16.88
Total	**9,752**	**2,192,908**	**100.00**	**420,109**	**22.81**	**12.19**	**9.36**	**16.65**	**24.04**	**21.68**	**19.33**	**24.09**	**21.43**	**41.21**	**35.89**	**30.66**	**--**	**3.79**	**16.88**

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

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2024**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
2024 Chicago MMSA	3,973	1,033,389	100.00	--	22.95	10.60	--	16.72	20.51	--	19.35	25.82	--	40.98	40.75	--	--	2.32	--
Total	**3,973**	**1,033,389**	**100.00**	**--**	**22.95**	**10.60**	**--**	**16.72**	**20.51**	**--**	**19.35**	**25.82**	**--**	**40.98**	**40.75**	**--**	**--**	**2.32**	**--**

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

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022 - 2023**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
2022-2023 Chicago MMSA	4,195	801,273	100.00	522,218	5.74	4.82	4.50	16.58	15.90	16.00	32.58	36.11	34.41	44.57	42.86	44.69	0.52	0.31	0.41
Total	**4,195**	**801,273**	**100.00**	**522,218**	**5.74**	**4.82**	**4.50**	**16.58**	**15.90**	**16.00**	**32.58**	**36.11**	**34.41**	**44.57**	**42.86**	**44.69**	**0.52**	**0.31**	**0.41**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2024**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
2024 Chicago MMSA	2,100	355,275	100.00	--	5.79	7.19	--	17.02	27.05	--	32.59	29.10	--	44.11	36.48	--	0.50	0.19	--
Total	**2,100**	**355,275**	**100.00**	**--**	**5.79**	**7.19**	**--**	**17.02**	**27.05**	**--**	**32.59**	**29.10**	**--**	**44.11**	**36.48**	**--**	**0.50**	**0.19**	**--**

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2022 - 2023**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
2022-2023 Chicago MMSA	4,195	801,273	100.00	522,218	80.37	58.74	54.63	11.28	36.95	8.35	4.31
Total	**4,195**	**801,273**	**100.00**	**522,218**	**80.37**	**58.74**	**54.63**	**11.28**	**36.95**	**8.35**	**4.31**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2024**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
2024 Chicago MMSA	2,100	355,275	100.00	--	80.30	60.10	--	10.69	31.00	9.01	8.90
Total	**2,100**	**355,275**	**100.00**	**--**	**80.30**	**60.10**	**--**	**10.69**	**31.00**	**9.01**	**8.90**

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Cincinnati MMSA

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Cincinnati MMSA	13,315	1,899,807	100.00	134,631	3.44	2.58	3.69	17.45	16.98	19.80	41.22	40.36	40.97	37.38	39.77	35.00	0.51	0.31	0.51
Total	**13,315**	**1,899,807**	**100.00**	**134,631**	**3.44**	**2.58**	**3.69**	**17.45**	**16.98**	**19.80**	**41.22**	**40.36**	**40.97**	**37.38**	**39.77**	**35.00**	**0.51**	**0.31**	**0.51**

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

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Cincinnati MMSA	13,315	1,899,807	100.00	134,631	20.76	16.72	11.37	17.17	24.73	21.78	21.01	22.52	21.64	41.06	27.54	30.09	--	8.49	15.13
Total	**13,315**	**1,899,807**	**100.00**	**134,631**	**20.76**	**16.72**	**11.37**	**17.17**	**24.73**	**21.78**	**21.01**	**22.52**	**21.64**	**41.06**	**27.54**	**30.09**	**--**	**8.49**	**15.13**

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

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2024
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Cincinnati MMSA	3,187	432,764	100.00	86,553	6.03	8.32	5.44	19.94	26.76	18.39	34.62	30.03	35.68	38.28	33.98	39.51	1.14	0.91	0.98
Total	**3,187**	**432,764**	**100.00**	**86,553**	**6.03**	**8.32**	**5.44**	**19.94**	**26.76**	**18.39**	**34.62**	**30.03**	**35.68**	**38.28**	**33.98**	**39.51**	**1.14**	**0.91**	**0.98**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2022 - 2024											
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
Cincinnati MMSA	3,187	432,764	100.00	86,553	81.00	60.78	53.23	8.77	31.16	10.23	8.06
Total	**3,187**	**432,764**	**100.00**	**86,553**	**81.00**	**60.78**	**53.23**	**8.77**	**31.16**	**10.23**	**8.06**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Evansville MMSA

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2023
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**
2022-2023 Evansville MMSA	1,191	128,181	100.00	18,676	5.16	3.44	4.61	18.10	20.91	19.61	43.08	38.54	39.00	33.47	37.11	36.67	0.19	0.00	0.09
Total	**1,191**	**128,181**	**100.00**	**18,676**	**5.16**	**3.44**	**4.61**	**18.10**	**20.91**	**19.61**	**43.08**	**38.54**	**39.00**	**33.47**	**37.11**	**36.67**	**0.19**	**0.00**	**0.09**

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

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022 - 2023
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Borrowers**			**Moderate-Income Borrowers**			**Middle-Income Borrowers**			**Upper-Income Borrowers**			**Not Available-Income Borrowers**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**
2022-2023 Evansville MMSA	1,191	128,181	100.00	18,676	21.25	21.75	11.67	17.70	28.80	21.73	21.02	24.77	20.56	40.03	20.82	25.10	--	3.86	20.94
Total	**1,191**	**128,181**	**100.00**	**18,676**	**21.25**	**21.75**	**11.67**	**17.70**	**28.80**	**21.73**	**21.02**	**24.77**	**20.56**	**40.03**	**20.82**	**25.10**	**--**	**3.86**	**20.94**

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

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2023
Assessment Area:	**Total Loans to Small Businesses**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**
2022-2023 Evansville MMSA	161	22,187	100.00	9,551	8.01	4.35	8.25	22.17	31.06	20.49	32.07	26.71	32.46	31.62	26.71	34.45	6.12	11.18	4.36
Total	**161**	**22,187**	**100.00**	**9,551**	**8.01**	**4.35**	**8.25**	**22.17**	**31.06**	**20.49**	**32.07**	**26.71**	**32.46**	**31.62**	**26.71**	**34.45**	**6.12**	**11.18**	**4.36**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
2022-2023 Evansville MMSA	161	22,187	100.00	9,551	77.71	62.11	51.91	10.30	36.65	11.98	1.24
Total	**161**	**22,187**	**100.00**	**9,551**	**77.71**	**62.11**	**51.91**	**10.30**	**36.65**	**11.98**	**1.24**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Huntington MMSA

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2024
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**
Huntington MMSA	430	47,248	100.00	9,093	1.68	0.47	1.88	14.88	11.86	13.44	47.76	48.60	50.29	35.68	39.07	34.39	--	--	--
Total	**430**	**47,248**	**100.00**	**9,093**	**1.68**	**0.47**	**1.88**	**14.88**	**11.86**	**13.44**	**47.76**	**48.60**	**50.29**	**35.68**	**39.07**	**34.39**	**--**	**--**	**--**

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

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2024
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Borrowers**			**Moderate-Income Borrowers**			**Middle-Income Borrowers**			**Upper-Income Borrowers**			**Not Available-Income Borrowers**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**
Huntington MMSA	430	47,248	100.00	9,093	20.79	9.30	7.90	15.59	22.33	19.54	20.18	23.95	22.01	43.44	43.02	36.90	--	1.40	13.66
Total	**430**	**47,248**	**100.00**	**9,093**	**20.79**	**9.30**	**7.90**	**15.59**	**22.33**	**19.54**	**20.18**	**23.95**	**22.01**	**43.44**	**43.02**	**36.90**	**--**	**1.40**	**13.66**

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

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2024
Assessment Area:	**Total Loans to Small Businesses**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**
Huntington MMSA	32	2,698	100.00	6,108	10.14	9.38	8.63	20.48	34.38	15.96	39.07	28.13	43.88	30.31	28.13	31.53	--	--	--
Total	**32**	**2,698**	**100.00**	**6,108**	**10.14**	**9.38**	**8.63**	**20.48**	**34.38**	**15.96**	**39.07**	**28.13**	**43.88**	**30.31**	**28.13**	**31.53**	**--**	**--**	**--**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues								2022 - 2024			
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
Huntington MMSA	32	2,698	100.00	6,108	73.56	68.75	51.72	11.44	28.13	15.00	3.13
Total	**32**	**2,698**	**100.00**	**6,108**	**73.56**	**68.75**	**51.72**	**11.44**	**28.13**	**15.00**	**3.13**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Louisville MMSA

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Louisville MMSA	3,327	492,090	100.00	64,797	3.37	2.34	3.70	18.19	15.78	17.74	39.85	37.21	39.34	38.14	44.24	38.80	0.45	0.42	0.39
Total	**3,327**	**492,090**	**100.00**	**64,797**	**3.37**	**2.34**	**3.70**	**18.19**	**15.78**	**17.74**	**39.85**	**37.21**	**39.34**	**38.14**	**44.24**	**38.80**	**0.45**	**0.42**	**0.39**

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

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Louisville MMSA	3,327	492,090	100.00	64,797	20.40	14.19	10.61	17.96	22.69	21.79	19.84	23.23	20.66	41.81	36.49	33.04	--	3.40	13.91
Total	**3,327**	**492,090**	**100.00**	**64,797**	**20.40**	**14.19**	**10.61**	**17.96**	**22.69**	**21.79**	**19.84**	**23.23**	**20.66**	**41.81**	**36.49**	**33.04**	**--**	**3.40**	**13.91**

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

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2024
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Louisville MMSA	604	85,496	100.00	45,596	5.95	5.46	4.67	18.17	25.50	15.86	36.12	31.62	36.24	38.23	34.77	41.91	1.53	2.65	1.31
Total	**604**	**85,496**	**100.00**	**45,596**	**5.95**	**5.46**	**4.67**	**18.17**	**25.50**	**15.86**	**36.12**	**31.62**	**36.24**	**38.23**	**34.77**	**41.91**	**1.53**	**2.65**	**1.31**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2022 - 2024

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Louisville MMSA	604	85,496	100.00	45,596	82.18	63.08	51.10	8.41	31.95	9.40	4.97
Total	**604**	**85,496**	**100.00**	**45,596**	**82.18**	**63.08**	**51.10**	**8.41**	**31.95**	**9.40**	**4.97**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

South Bend MMSA

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2024
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**
South Bend MMSA	375	48,067	100.00	18,412	3.27	1.07	2.76	17.62	20.53	18.54	44.16	46.67	42.82	34.63	31.47	35.47	0.32	0.27	0.36
Total	**375**	**48,067**	**100.00**	**18,412**	**3.27**	**1.07**	**2.76**	**17.62**	**20.53**	**18.54**	**44.16**	**46.67**	**42.82**	**34.63**	**31.47**	**35.47**	**0.32**	**0.27**	**0.36**

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

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022 - 2024
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Borrowers**			**Moderate-Income Borrowers**			**Middle-Income Borrowers**			**Upper-Income Borrowers**			**Not Available-Income Borrowers**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**
South Bend MMSA	375	48,067	100.00	18,412	20.26	16.80	14.36	17.62	22.93	23.06	21.57	23.73	21.20	40.55	33.87	29.84	--	2.67	11.54
Total	**375**	**48,067**	**100.00**	**18,412**	**20.26**	**16.80**	**14.36**	**17.62**	**22.93**	**23.06**	**21.57**	**23.73**	**21.20**	**40.55**	**33.87**	**29.84**	**--**	**2.67**	**11.54**

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

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2022 - 2024
Assessment Area:	**Total Loans to Small Businesses**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**
South Bend MMSA	87	17,875	100.00	9,345	5.79	2.30	4.22	23.83	29.89	21.07	40.30	44.83	40.32	29.54	21.84	33.98	0.54	1.15	0.42
Total	**87**	**17,875**	**100.00**	**9,345**	**5.79**	**2.30**	**4.22**	**23.83**	**29.89**	**21.07**	**40.30**	**44.83**	**40.32**	**29.54**	**21.84**	**33.98**	**0.54**	**1.15**	**0.42**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues								2022 - 2024			
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
South Bend MMSA	87	17,875	100.00	9,345	77.62	55.17	53.92	9.80	33.33	12.57	11.49
Total	**87**	**17,875**	**100.00**	**9,345**	**77.62**	**55.17**	**53.92**	**9.80**	**33.33**	**12.57**	**11.49**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

State of Florida

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2024
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**
Naples MSA	865	320,248	7.73	27,278	2.25	0.92	1.16	17.43	20.12	19.28	40.69	42.77	44.35	38.39	35.03	34.13	1.24	1.16	1.06
Cape Coral MSA	1,322	321,241	11.82	61,706	0.95	0.15	0.91	17.11	9.83	19.85	49.59	51.74	50.37	32.11	37.90	28.38	0.24	0.38	0.48
Deltona MSA	562	127,474	5.03	41,116	1.77	1.96	1.67	12.01	8.19	9.70	58.22	51.42	57.17	28.00	38.43	31.46	--	--	--
Jacksonville MSA	976	282,700	8.73	111,393	3.56	0.61	2.76	20.86	11.07	19.61	39.79	37.70	44.58	35.34	49.39	32.42	0.45	1.23	0.62
Lakeland MSA	455	106,337	4.07	61,716	1.03	0.66	0.80	20.02	12.75	17.79	46.96	43.52	48.92	31.19	42.20	31.83	0.81	0.88	0.65
Miami MSA	2,777	1,116,253	24.83	275,861	2.91	2.05	2.64	21.81	19.45	21.00	32.09	33.85	32.31	42.16	43.46	42.99	1.02	1.19	1.04
North Port MSA	1,377	378,252	12.31	67,619	1.22	0.22	0.51	18.10	11.33	14.86	46.68	43.86	41.28	33.83	43.94	42.32	0.17	0.65	1.01
Orlando MSA	2,563	709,056	22.92	159,493	1.45	0.82	1.47	22.76	13.85	19.39	37.70	36.56	41.27	37.83	48.54	37.65	0.25	0.23	0.19
Punta Gorda MSA	286	65,961	2.56	18,171	--	--	--	14.83	9.09	11.76	67.21	72.38	67.67	17.97	18.53	20.56	--	--	--
Total	**11,183**	**3,427,522**	**100.00**	**824,353**	**2.22**	**0.99**	**1.83**	**20.38**	**14.24**	**18.85**	**39.36**	**41.11**	**41.45**	**37.41**	**42.95**	**37.18**	**0.63**	**0.71**	**0.67**

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

Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2023
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**
2022-2023 Tampa MSA	2,379	626,333	100.00	199,838	1.57	1.26	1.76	23.10	17.23	22.12	37.66	34.30	35.29	37.16	46.66	40.38	0.51	0.55	0.44
Total	**2,379**	**626,333**	**100.00**	**199,838**	**1.57**	**1.26**	**1.76**	**23.10**	**17.23**	**22.12**	**37.66**	**34.30**	**35.29**	**37.16**	**46.66**	**40.38**	**0.51**	**0.55**	**0.44**

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

Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2024
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**
2024 Tampa MSA	1,141	350,728	100.00	--	1.56	1.49	--	23.98	36.72	--	36.84	25.94	--	37.11	35.41	--	0.51	0.44	--
Total	**1,141**	**350,728**	**100.00**	**--**	**1.56**	**1.49**	**--**	**23.98**	**36.72**	**--**	**36.84**	**25.94**	**--**	**37.11**	**35.41**	**--**	**0.51**	**0.44**	**--**

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

Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2023 - 2024**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
2023-2024 Palm Bay MSA	135	46,791	100.00	21,431	0.85	0.00	0.99	18.36	9.63	21.08	45.63	51.85	43.53	34.63	38.52	33.85	0.53	0.00	0.54
Total	**135**	**46,791**	**100.00**	**21,431**	**0.85**	0.00	**0.99**	**18.36**	**9.63**	**21.08**	**45.63**	**51.85**	**43.53**	**34.63**	**38.52**	**33.85**	**0.53**	0.00	**0.54**

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

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2022 - 2024**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Naples MSA	865	320,248	7.73	27,278	21.93	5.78	3.45	18.03	17.80	10.69	19.55	23.70	17.73	40.49	50.29	53.01	--	2.43	15.13
Cape Coral MSA	1,322	321,241	11.82	61,706	19.27	5.82	3.60	18.96	15.96	13.77	20.85	26.40	22.06	40.92	47.81	41.85	--	4.01	18.71
Deltona MSA	562	127,474	5.03	41,116	19.30	5.34	4.20	18.96	19.22	14.60	21.80	25.98	23.25	39.94	46.26	38.94	--	3.20	19.01
Jacksonville MSA	976	282,700	8.73	111,393	21.47	5.02	5.30	18.29	12.09	15.94	19.83	26.13	21.38	40.40	54.41	36.55	--	2.36	20.83
Lakeland MSA	455	106,337	4.07	61,716	19.51	1.76	2.17	19.32	10.99	10.35	20.44	29.01	23.69	40.73	54.73	38.68	--	3.52	25.11
Miami MSA	2,777	1,116,253	24.83	275,861	22.46	1.69	2.74	17.65	8.68	8.36	18.02	20.53	15.95	41.88	67.30	52.67	--	1.80	20.27
North Port MSA	1,377	378,252	12.31	67,619	18.80	7.04	4.78	19.63	17.65	13.96	20.40	25.49	20.38	41.16	47.35	43.92	--	2.47	16.96
Orlando MSA	2,563	709,056	22.92	159,493	21.28	3.98	3.38	18.04	12.80	11.97	19.24	24.97	21.17	41.45	55.60	43.95	--	2.65	19.53
Punta Gorda MSA	286	65,961	2.56	18,171	16.72	3.50	3.45	20.43	16.43	12.52	22.80	26.57	20.59	40.05	51.05	44.84	--	2.45	18.60
Total	**11,183**	**3,427,522**	**100.00**	**824,353**	**21.31**	**4.20**	**3.51**	**18.20**	**13.41**	**11.58**	**19.17**	**24.36**	**19.62**	**41.32**	**55.43**	**45.39**	**--**	**2.59**	**19.91**

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

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2022 - 2023**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
2022-2023 Tampa MSA	2,379	626,333	100.00	199,838	20.76	5.72	4.37	17.94	16.48	13.68	19.05	22.45	21.10	42.24	52.63	43.10	--	2.73	17.75
Total	**2,379**	**626,333**	**100.00**	**199,838**	**20.76**	**5.72**	**4.37**	**17.94**	**16.48**	**13.68**	**19.05**	**22.45**	**21.10**	**42.24**	**52.63**	**43.10**	**--**	**2.73**	**17.75**

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

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2024**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
2024 Tampa MSA	1,141	350,728	100.00	--	20.68	5.17	--	17.93	23.93	--	19.11	20.60	--	42.28	48.47	--	--	1.84	--
Total	**1,141**	**350,728**	**100.00**	**--**	**20.68**	**5.17**	**--**	**17.93**	**23.93**	**--**	**19.11**	**20.60**	**--**	**42.28**	**48.47**	**--**	**--**	**1.84**	**--**

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

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2023 - 2024**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
2023-2024 Palm Bay MSA	135	46,791	100.00	21,431	20.03	8.15	4.56	18.47	10.37	14.26	20.16	25.19	22.29	41.33	51.85	36.46	--	4.44	22.43
Total	**135**	**46,791**	**100.00**	**21,431**	**20.03**	**8.15**	**4.56**	**18.47**	**10.37**	**14.26**	**20.16**	**25.19**	**22.29**	**41.33**	**51.85**	**36.46**	**--**	**4.44**	**22.43**

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

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2024
Assessment Area:	**Total Loans to Small Businesses**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**
Naples MSA	446	40,063	13.56	34,515	2.81	2.47	2.24	14.69	19.96	16.53	40.44	42.38	45.60	41.03	35.20	34.77	1.03	--	0.85
Cape Coral MSA	368	47,354	11.19	57,425	2.48	0.27	1.82	24.30	26.09	22.12	44.18	44.57	47.31	28.41	28.80	28.31	0.63	0.27	0.44
Deltona MSA	140	17,449	4.26	31,713	4.08	7.86	3.68	17.10	25.00	16.05	52.92	47.14	52.23	25.90	20.00	28.04	--	--	--
Jacksonville MSA	249	47,986	7.57	87,405	5.15	6.43	4.35	23.04	19.68	19.49	38.44	40.56	38.76	31.23	32.13	35.76	2.14	1.20	1.64
Lakeland MSA	93	7,580	2.83	34,975	0.79	0.00	0.65	24.37	31.18	23.37	45.35	38.71	45.39	28.78	30.11	29.91	0.71	--	0.69
Miami MSA	469	112,779	14.26	732,586	2.75	3.41	2.83	23.17	22.81	21.97	28.59	23.24	29.37	43.21	46.06	43.29	2.29	4.48	2.55
North Port MSA	360	46,529	10.95	62,236	1.08	0.56	0.99	15.93	14.44	14.50	47.77	43.89	44.97	34.96	40.56	39.13	0.26	0.56	0.40
Orlando MSA	1,121	142,090	34.09	211,932	2.38	2.14	1.85	26.74	28.99	24.76	33.53	34.79	33.47	36.42	33.45	38.85	0.93	0.62	1.07
Punta Gorda MSA	42	7,611	1.28	10,545	--	--	--	17.86	28.57	15.01	64.77	59.52	65.92	17.37	11.90	19.07	--	--	--
Total	**3,288**	**469,441**	**100.00**	**1,263,332**	**2.74**	**2.46**	**2.56**	**23.00**	**24.15**	**21.59**	**34.32**	**37.65**	**34.06**	**38.30**	**34.70**	**39.95**	**1.64**	**1.03**	**1.85**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2023
Assessment Area:	**Total Loans to Small Businesses**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**
2022-2023 Tampa MSA	649	80,693	100.00	210,586	3.36	3.85	3.11	21.79	23.42	20.50	33.37	34.36	33.12	39.67	36.06	41.38	1.81	2.31	1.89
Total	**649**	**80,693**	**100.00**	**210,586**	**3.36**	**3.85**	**3.11**	**21.79**	**23.42**	**20.50**	**33.37**	**34.36**	**33.12**	**39.67**	**36.06**	**41.38**	**1.81**	**2.31**	**1.89**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2024
Assessment Area:	**Total Loans to Small Businesses**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**
2024 Tampa MSA	348	37,060	100.00	--	3.10	3.16	--	21.65	35.06	--	32.72	29.02	--	41.02	30.46	--	1.51	2.30	--
Total	**348**	**37,060**	**100.00**	**--**	**3.10**	**3.16**	**--**	**21.65**	**35.06**	**--**	**32.72**	**29.02**	**--**	**41.02**	**30.46**	**--**	**1.51**	**2.30**	**--**

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2023 - 2024
Assessment Area:	**Total Loans to Small Businesses**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**
2023-2024 Palm Bay MSA	18	4,301	100.00	16,344	2.52	0.00	2.76	20.50	16.67	20.97	41.06	33.33	39.37	35.33	50.00	36.39	0.59	0.00	0.51
Total	**18**	**4,301**	**100.00**	**16,344**	**2.52**	0.00	**2.76**	**20.50**	**16.67**	**20.97**	**41.06**	**33.33**	**39.37**	**35.33**	**50.00**	**36.39**	**0.59**	0.00	**0.51**

Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2023, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues								2022 - 2024			
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
Naples MSA	446	40,063	13.56	34,515	84.12	75.56	51.87	8.83	20.63	7.06	3.81
Cape Coral MSA	368	47,354	11.19	57,425	85.45	64.67	53.04	7.10	31.52	7.45	3.80
Deltona MSA	140	17,449	4.26	31,713	84.75	60.00	54.53	8.21	29.29	7.04	10.71
Jacksonville MSA	249	47,986	7.57	87,405	84.44	53.01	51.52	7.54	41.77	8.02	5.22
Lakeland MSA	93	7,580	2.83	34,975	85.47	76.34	55.47	7.07	20.43	7.46	3.23
Miami MSA	469	112,779	14.26	732,586	85.61	60.77	53.21	7.57	35.39	6.82	3.84
North Port MSA	360	46,529	10.95	62,236	84.39	66.67	54.68	8.44	28.61	7.17	4.72
Orlando MSA	1,121	142,090	34.09	211,932	85.44	69.67	53.73	7.05	27.30	7.51	3.03
Punta Gorda MSA	42	7,611	1.28	10,545	84.66	76.19	55.31	7.94	21.43	7.39	2.38
Total	**3,288**	**469,441**	**100.00**	**1,263,332**	**85.31**	**66.91**	**53.32**	**7.54**	**29.08**	**7.15**	**4.01**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues								2022 - 2023			
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
2022-2023 Tampa MSA	649	80,693	100.00	210,586	85.91	66.87	53.44	7.81	27.58	6.29	5.55
Total	**649**	**80,693**	**100.00**	**210,586**	**85.91**	**66.87**	**53.44**	**7.81**	**27.58**	**6.29**	**5.55**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
2024 Tampa MSA	348	37,060	100.00	--	84.88	70.40	--	7.69	22.41	7.44	7.18
Total	**348**	**37,060**	**100.00**	**--**	**84.88**	**70.40**	**--**	**7.69**	**22.41**	**7.44**	**7.18**

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
2023-2024 Palm Bay MSA	18	4,301	100.00	16,344	84.12	50.00	54.42	8.26	38.89	7.61	11.11
Total	**18**	**4,301**	**100.00**	**16,344**	**84.12**	**50.00**	**54.42**	**8.26**	**38.89**	**7.61**	**11.11**

Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2023, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

State of Georgia

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2024
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**
Augusta MSA	168	25,706	100.00	20,827	5.77	1.79	3.64	14.09	11.31	11.26	36.46	41.07	38.21	42.28	43.45	45.67	1.39	2.38	1.21
Total	**168**	**25,706**	**100.00**	**20,827**	**5.77**	**1.79**	**3.64**	**14.09**	**11.31**	**11.26**	**36.46**	**41.07**	**38.21**	**42.28**	**43.45**	**45.67**	**1.39**	**2.38**	**1.21**

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

Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2023
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**
2022-2023 Atlanta MSA	1,683	507,121	100.00	209,574	3.69	3.39	4.70	16.94	16.93	18.61	29.83	28.88	30.30	47.75	48.60	43.94	1.78	2.20	2.43
Total	**1,683**	**507,121**	**100.00**	**209,574**	**3.69**	**3.39**	**4.70**	**16.94**	**16.93**	**18.61**	**29.83**	**28.88**	**30.30**	**47.75**	**48.60**	**43.94**	**1.78**	**2.20**	**2.43**

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

Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2024**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
2024 Atlanta MSA	435	134,521	100.00	--	3.67	8.28	--	15.42	27.13	--	31.54	21.15	--	47.58	42.30	--	1.78	1.15	--
Total	**435**	**134,521**	**100.00**	**--**	**3.67**	**8.28**	**--**	**15.42**	**27.13**	**--**	**31.54**	**21.15**	**--**	**47.58**	**42.30**	**--**	**1.78**	**1.15**	**--**

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

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2022 - 2024**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Augusta MSA	168	25,706	100.00	20,827	22.72	11.90	3.83	14.59	22.62	14.31	19.51	24.40	21.62	43.19	38.69	39.09	--	2.38	21.16
Total	**168**	**25,706**	**100.00**	**20,827**	**22.72**	**11.90**	**3.83**	**14.59**	**22.62**	**14.31**	**19.51**	**24.40**	**21.62**	**43.19**	**38.69**	**39.09**	**--**	**2.38**	**21.16**

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

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2022 - 2023**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
2022-2023 Atlanta MSA	1,683	507,121	100.00	209,574	21.39	6.48	5.28	16.11	19.37	16.36	18.34	23.35	20.16	44.16	48.31	39.42	--	2.50	18.78
Total	**1,683**	**507,121**	**100.00**	**209,574**	**21.39**	**6.48**	**5.28**	**16.11**	**19.37**	**16.36**	**18.34**	**23.35**	**20.16**	**44.16**	**48.31**	**39.42**	**--**	**2.50**	**18.78**

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

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2024		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
2024 Atlanta MSA	435	134,521	100.00	--	21.13	8.28	--	16.03	13.56	--	18.25	23.45	--	44.60	52.18	--	--	2.53	--
Total	**435**	**134,521**	**100.00**	**--**	**21.13**	**8.28**	**--**	**16.03**	**13.56**	**--**	**18.25**	**23.45**	**--**	**44.60**	**52.18**	**--**	**--**	**2.53**	**--**

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

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2024
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Augusta MSA	18	5,323	100.00	14,615	9.37	22.22	7.36	17.26	22.22	13.40	34.03	27.78	34.75	31.63	22.22	38.67	7.70	5.56	5.81
Total	**18**	**5,323**	**100.00**	**14,615**	**9.37**	**22.22**	**7.36**	**17.26**	**22.22**	**13.40**	**34.03**	**27.78**	**34.75**	**31.63**	**22.22**	**38.67**	**7.70**	**5.56**	**5.81**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2023
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
2022-2023 Atlanta MSA	328	81,875	100.00	319,080	5.79	4.27	4.90	21.36	20.73	19.94	25.16	20.12	26.29	43.93	52.74	45.56	3.75	2.13	3.31
Total	**328**	**81,875**	**100.00**	**319,080**	**5.79**	**4.27**	**4.90**	**21.36**	**20.73**	**19.94**	**25.16**	**20.12**	**26.29**	**43.93**	**52.74**	**45.56**	**3.75**	**2.13**	**3.31**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2024
Assessment Area:	**Total Loans to Small Businesses**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**
2024 Atlanta MSA	194	38,900	100.00	--	5.98	5.67	--	20.02	19.59	--	27.54	34.02	--	42.98	38.66	--	3.48	2.06	--
Total	**194**	**38,900**	**100.00**	**--**	**5.98**	**5.67**	**--**	**20.02**	**19.59**	**--**	**27.54**	**34.02**	**--**	**42.98**	**38.66**	**--**	**3.48**	**2.06**	**--**

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2024
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
Augusta MSA	18	5,323	100.00	14,615	84.08	55.56	51.67	6.91	38.89	9.00	5.56
Total	**18**	**5,323**	**100.00**	**14,615**	**84.08**	**55.56**	**51.67**	**6.91**	**38.89**	**9.00**	**5.56**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2023
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
2022-2023 Atlanta MSA	328	81,875	100.00	319,080	88.16	50.00	49.50	6.46	44.51	5.39	5.49
Total	**328**	**81,875**	**100.00**	**319,080**	**88.16**	**50.00**	**49.50**	**6.46**	**44.51**	**5.39**	**5.49**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
2024 Atlanta MSA	194	38,900	100.00	--	88.31	58.76	--	5.89	37.63	5.80	3.61
Total	**194**	**38,900**	**100.00**	**--**	**88.31**	**58.76**	**--**	**5.89**	**37.63**	**5.80**	**3.61**

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

State of Illinois

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2024
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**
Rockford MSA	128	14,130	100.00	13,627	3.70	2.34	3.34	22.20	16.41	23.07	36.17	43.75	38.56	37.62	37.50	34.78	0.31	0.00	0.25
Total	**128**	**14,130**	**100.00**	**13,627**	**3.70**	**2.34**	**3.34**	**22.20**	**16.41**	**23.07**	**36.17**	**43.75**	**38.56**	**37.62**	**37.50**	**34.78**	**0.31**	**0.00**	**0.25**

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

Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2023
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**
2022-2023 IL non-MSA	189	14,545	78.10	5,468	2.00	3.17	1.44	15.37	19.05	18.23	56.37	52.38	55.96	26.25	25.40	24.36	--	--	--
2022-2023 Carbondale MSA	53	4,422	21.90	2,891	--	--	--	19.51	20.75	24.80	55.95	54.72	50.47	22.00	22.64	21.79	2.55	1.89	2.94
Total	**242**	**18,967**	**100.00**	**8,359**	**1.45**	**2.48**	**0.95**	**16.51**	**19.42**	**20.50**	**56.26**	**52.89**	**54.06**	**25.09**	**24.79**	**23.47**	**0.70**	**0.41**	**1.02**

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

Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2024
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**
2024 IL non-MSA	97	9,125	100.00	--	1.45	3.09	--	15.51	12.37	--	58.41	59.79	--	23.93	24.74	--	0.70	0.00	--
Total	**97**	**9,125**	**100.00**	**--**	**1.45**	**3.09**	**--**	**15.51**	**12.37**	**--**	**58.41**	**59.79**	**--**	**23.93**	**24.74**	**--**	**0.70**	**0.00**	**--**

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

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2024
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Borrowers**			**Moderate-Income Borrowers**			**Middle-Income Borrowers**			**Upper-Income Borrowers**			**Not Available-Income Borrowers**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**
Rockford MSA	128	14,130	100.00	13,627	22.82	10.16	12.97	17.78	25.78	23.63	19.60	28.13	22.57	39.80	31.25	24.99	--	4.69	15.85
Total	**128**	**14,130**	**100.00**	**13,627**	**22.82**	**10.16**	**12.97**	**17.78**	**25.78**	**23.63**	**19.60**	**28.13**	**22.57**	**39.80**	**31.25**	**24.99**	**--**	**4.69**	**15.85**

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

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2023
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Borrowers**			**Moderate-Income Borrowers**			**Middle-Income Borrowers**			**Upper-Income Borrowers**			**Not Available-Income Borrowers**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**
2022-2023 IL non-MSA	189	14,545	78.10	5,468	19.82	19.58	13.30	18.40	32.80	25.05	22.04	22.75	21.73	39.74	22.75	24.38	--	2.12	15.54
2022-2023 Carbondale MSA	53	4,422	21.90	2,891	20.98	13.21	10.48	17.71	24.53	20.20	18.88	20.75	20.55	42.43	32.08	30.02	--	9.43	18.75
Total	**242**	**18,967**	**100.00**	**8,359**	**20.13**	**18.18**	**12.32**	**18.21**	**30.99**	**23.38**	**21.18**	**22.31**	**21.32**	**40.48**	**24.79**	**26.33**	**--**	**3.72**	**16.65**

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

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2024**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
2024 IL non-MSA	97	9,125	100.00	--	19.88	15.46	--	18.07	26.80	--	21.12	20.62	--	40.93	35.05	--	--	2.06	--
Total	**97**	**9,125**	**100.00**	**--**	**19.88**	**15.46**	**--**	**18.07**	**26.80**	**--**	**21.12**	**20.62**	**--**	**40.93**	**35.05**	**--**	**--**	**2.06**	**--**

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

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022 - 2024**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Rockford MSA	36	6,456	100.00	8,660	5.25	2.78	4.86	25.95	33.33	23.76	31.97	22.22	32.09	33.43	41.67	36.92	3.40	--	2.37
Total	**36**	**6,456**	**100.00**	**8,660**	**5.25**	**2.78**	**4.86**	**25.95**	**33.33**	**23.76**	**31.97**	**22.22**	**32.09**	**33.43**	**41.67**	**36.92**	**3.40**	**--**	**2.37**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022 - 2023**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
2022-2023 IL non-MSA	28	3,470	87.50	3,980	5.10	3.57	3.49	20.06	21.43	19.32	51.02	10.71	53.59	23.81	64.29	23.59	--	--	--
2022-2023 Carbondale MSA	4	111	12.50	1,952	--	--	--	14.89	0.00	13.58	51.21	100.00	51.02	24.82	0.00	27.36	9.08	0.00	8.04
Total	**32**	**3,581**	**100.00**	**5,932**	**3.65**	**3.13**	**2.34**	**18.59**	**18.75**	**17.43**	**51.07**	**21.88**	**52.75**	**24.10**	**56.25**	**24.83**	**2.58**	0.00	**2.65**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2024
Assessment Area:	**Total Loans to Small Businesses**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**
2024 IL non-MSA	22	759	100.00	--	3.54	9.09	--	17.95	54.55	--	52.36	9.09	--	23.70	27.27	--	2.45	--	--
Total	**22**	**759**	**100.00**	**--**	**3.54**	**9.09**	**--**	**17.95**	**54.55**	**--**	**52.36**	**9.09**	**--**	**23.70**	**27.27**	**--**	**2.45**	**--**	**--**

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2024
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
Rockford MSA	36	6,456	100.00	8,660	75.07	38.89	53.61	12.32	41.67	12.61	19.44
Total	**36**	**6,456**	**100.00**	**8,660**	**75.07**	**38.89**	**53.61**	**12.32**	**41.67**	**12.61**	**19.44**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2023
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
2022-2023 IL non-MSA	28	3,470	87.50	3,980	71.46	75.00	56.03	12.87	21.43	15.67	3.57
2022-2023 Carbondale MSA	4	111	12.50	1,952	72.43	75.00	54.00	13.19	25.00	14.37	0.00
Total	**32**	**3,581**	**100.00**	**5,932**	**71.74**	**75.00**	**55.36**	**12.96**	**21.88**	**15.30**	**3.13**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2024											
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
2024 IL non-MSA	22	759	100.00	--	72.14	54.55	--	12.30	13.64	15.56	31.82
Total	**22**	**759**	**100.00**	**--**	**72.14**	**54.55**	**--**	**12.30**	**13.64**	**15.56**	**31.82**
Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.											
Due to rounding, totals may not equal 100.0%											

State of Indiana

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2024
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**
Indianapolis MSA	5,143	896,963	68.19	128,269	4.58	3.79	5.07	14.90	14.99	15.23	41.33	41.22	42.48	38.21	39.57	36.29	0.97	0.43	0.91
Bloomington MSA	250	35,828	3.31	6,613	2.23	2.40	3.18	14.10	14.80	11.99	38.66	36.00	38.71	43.08	44.80	44.37	1.92	2.00	1.74
Columbus MSA	249	33,518	3.30	5,546	--	--	--	15.01	16.06	17.13	72.53	69.88	70.77	12.46	14.06	12.08	--	--	--
Elkhart MSA	134	18,090	1.78	11,463	2.32	2.24	2.48	16.91	20.90	15.70	53.49	52.24	51.71	27.27	24.63	30.10	--	--	--
Fort Wayne MSA	1,136	179,188	15.06	23,767	3.53	1.85	2.40	17.88	13.64	17.01	41.79	35.39	36.69	36.64	49.12	43.72	0.16	0.00	0.18
Lafayette MSA	181	24,541	2.40	9,141	2.81	4.42	3.45	12.40	8.84	13.71	45.40	50.28	42.94	39.39	36.46	39.78	--	--	0.13
Michigan City MSA	449	51,632	5.95	6,343	--	--	--	18.62	19.82	16.93	56.19	59.47	56.65	25.13	20.71	26.33	0.06	0.00	0.08
Total	**7,542**	**1,239,761**	**100.00**	**191,142**	**3.75**	**3.09**	**4.13**	**15.45**	**15.06**	**15.40**	**43.95**	**42.61**	**43.50**	**36.15**	**38.88**	**36.26**	**0.71**	**0.36**	**0.70**

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

Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2023
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**
2022-2023 IN non-MSA	1,021	108,127	68.80	15,233	0.49	0.00	0.18	6.63	6.76	8.19	68.54	67.09	68.58	24.34	26.15	23.04	--	--	--
2022-2023 Terre Haute MSA	463	37,807	31.20	6,211	3.66	2.59	3.32	20.85	16.63	21.06	40.01	45.14	38.88	35.45	35.64	36.69	0.03	0.00	0.02
Total	**1,484**	**145,934**	**100.00**	**21,444**	**1.44**	**0.81**	**1.09**	**10.87**	**9.84**	**11.91**	**60.04**	**60.24**	**59.98**	**27.65**	**29.11**	**26.99**	**0.01**	**0.00**	**0.00**

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

Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2024
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**
2024 Evansville MSA	271	31,052	33.25	--	6.35	5.17	--	17.20	19.56	--	43.64	41.33	--	32.59	33.95	--	0.22	--	--
2024 IN non-MSA	366	40,860	44.91	--	0.47	0.00	--	6.29	6.56	--	65.37	65.03	--	27.87	28.42	--	--	--	--
2024 Terre Haute MSA	178	13,781	21.84	--	4.18	3.37	--	19.82	17.98	--	40.68	43.82	--	35.27	34.83	--	0.04	--	--
Total	**815**	**85,693**	**100.00**	**--**	**3.30**	**2.45**	**--**	**12.62**	**13.37**	**--**	**53.12**	**52.52**	**--**	**30.86**	**31.66**	**--**	**0.09**	**--**	**--**

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

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2024
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Borrowers**			**Moderate-Income Borrowers**			**Middle-Income Borrowers**			**Upper-Income Borrowers**			**Not Available-Income Borrowers**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**
Indianapolis MSA	5,143	896,963	68.19	128,269	20.10	15.28	9.85	17.69	24.38	21.36	20.63	23.57	21.64	41.58	33.74	31.54	--	3.03	15.60
Bloomington MSA	250	35,828	3.31	6,613	19.11	16.40	9.18	16.98	27.20	18.07	20.09	25.60	21.67	43.82	28.40	35.07	--	2.40	16.01
Columbus MSA	249	33,518	3.30	5,546	21.88	18.88	14.14	17.57	23.69	23.49	21.73	27.71	23.01	38.82	24.50	25.23	--	5.22	14.14
Elkhart MSA	134	18,090	1.78	11,463	19.21	15.67	9.89	18.45	26.12	25.20	22.68	29.10	26.80	39.66	25.37	26.45	--	3.73	11.65
Fort Wayne MSA	1,136	179,188	15.06	23,767	19.45	12.50	11.46	18.62	24.56	23.43	21.90	24.65	22.67	40.03	34.60	29.45	--	3.70	12.99
Lafayette MSA	181	24,541	2.40	9,141	20.94	6.63	8.63	16.75	21.55	20.39	20.60	25.97	22.80	41.71	41.99	36.16	--	3.87	12.02
Michigan City MSA	449	51,632	5.95	6,343	21.39	18.26	10.86	16.04	32.96	23.30	23.47	21.16	22.13	39.10	25.84	28.00	--	1.78	15.70
Total	**7,542**	**1,239,761**	**100.00**	**191,142**	**20.06**	**15.00**	**10.13**	**17.72**	**24.95**	**21.82**	**21.06**	**23.95**	**22.19**	**41.16**	**32.96**	**31.02**	**--**	**3.14**	**14.85**

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

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2023
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Borrowers**			**Moderate-Income Borrowers**			**Middle-Income Borrowers**			**Upper-Income Borrowers**			**Not Available-Income Borrowers**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**
2022-2023 IN non-MSA	1,021	108,127	68.80	15,233	18.00	16.06	12.29	18.01	30.46	24.41	21.90	25.95	22.81	42.09	24.09	25.27	--	3.43	15.22
2022-2023 Terre Haute MSA	463	37,807	31.20	6,211	22.97	15.55	9.79	17.03	30.24	22.59	21.80	23.76	21.82	38.20	27.00	30.56	--	3.46	15.25
Total	**1,484**	**145,934**	**100.00**	**21,444**	**19.50**	**15.90**	**11.57**	**17.72**	**30.39**	**23.88**	**21.87**	**25.27**	**22.52**	**40.91**	**25.00**	**26.80**	**--**	**3.44**	**15.23**

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

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2024
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Borrowers**			**Moderate-Income Borrowers**			**Middle-Income Borrowers**			**Upper-Income Borrowers**			**Not Available-Income Borrowers**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**
2024 Evansville MSA	271	31,052	33.25	--	21.35	18.45	--	18.06	31.73	--	21.23	22.88	--	39.35	23.99	--	--	2.95	--
2024 IN non-MSA	366	40,860	44.91	--	17.85	15.85	--	17.67	31.42	--	21.93	24.59	--	42.56	27.05	--	--	1.09	--
2024 Terre Haute MSA	178	13,781	21.84	--	22.99	16.85	--	16.94	23.03	--	21.36	24.16	--	38.71	34.83	--	--	1.12	--
Total	**815**	**85,693**	**100.00**	**--**	**20.03**	**16.93**	**--**	**17.70**	**29.69**	**--**	**21.57**	**23.93**	**--**	**40.70**	**27.73**	**--**	**--**	**1.72**	**--**

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

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2024
Assessment Area:	**Total Loans to Small Businesses**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**
Indianapolis MSA	939	133,452	78.58	81,975	7.35	7.77	5.58	18.49	22.47	15.57	36.46	35.78	38.47	34.52	30.14	38.27	3.18	3.83	2.11
Bloomington MSA	44	5,428	3.68	4,015	12.81	20.45	13.10	14.67	29.55	14.20	31.69	31.82	32.88	35.42	18.18	36.71	5.41	0.00	3.11
Columbus MSA	14	1,667	1.17	2,389	--	--	--	28.47	28.57	19.25	58.51	71.43	66.09	13.02	0.00	14.65	--	--	--
Elkhart MSA	27	6,492	2.26	6,716	2.62	0.00	1.41	19.58	29.63	16.74	55.56	51.85	49.27	22.24	18.52	32.58	--	--	--
Fort Wayne MSA	106	15,054	8.87	13,084	4.76	2.83	3.45	18.46	29.25	19.31	40.13	33.96	36.65	32.03	30.19	36.27	4.61	3.77	4.33
Lafayette MSA	20	1,419	1.67	4,758	8.59	5.00	7.71	25.95	25.00	21.19	34.04	45.00	37.60	27.61	20.00	31.15	3.81	5.00	2.35
Michigan City MSA	45	3,398	3.77	3,370	--	--	--	28.51	44.44	24.81	49.22	40.00	48.13	22.10	15.56	26.74	0.16	0.00	0.33
Total	**1,195**	**166,910**	**100.00**	**116,307**	**6.67**	**7.20**	**5.17**	**19.22**	**24.44**	**16.58**	**38.54**	**36.57**	**39.51**	**32.43**	**28.37**	**36.55**	**3.15**	**3.43**	**2.18**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2023
Assessment Area:	**Total Loans to Small Businesses**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**
2022-2023 IN non-MSA	107	13,116	79.26	7,446	0.57	0.00	0.20	10.37	8.41	7.75	65.09	63.55	65.04	23.97	28.04	27.01	--	--	--
2022-2023 Terre Haute MSA	28	1,327	20.74	3,071	6.57	3.57	7.42	17.14	25.00	17.00	40.06	35.71	39.82	29.40	35.71	31.36	6.83	0.00	4.40
Total	**135**	**14,443**	**100.00**	**10,517**	**2.32**	**0.74**	**2.31**	**12.34**	**11.85**	**10.45**	**57.80**	**57.78**	**57.68**	**25.55**	**29.63**	**28.28**	**1.99**	0.00	**1.28**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2024
Assessment Area:	**Total Loans to Small Businesses**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**
2024 Evansville MSA	92	7,176	52.57	--	9.37	13.04	--	19.87	41.30	--	33.89	27.17	--	29.47	11.96	--	7.39	6.52	--
2024 IN non-MSA	62	3,402	35.43	--	0.54	0.00	--	10.21	38.71	--	62.83	37.10	--	26.43	24.19	--	--	--	--
2024 Terre Haute MSA	21	1,463	12.00	--	8.19	0.00	--	18.73	61.90	--	40.78	23.81	--	26.80	14.29	--	5.50	0.00	--
Total	**175**	**12,041**	**100.00**	**--**	**5.28**	**6.86**	**--**	**15.42**	**42.86**	**--**	**47.73**	**30.29**	**--**	**27.73**	**16.57**	**--**	**3.84**	**3.43**	**--**

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues										2022 - 2024	
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
Indianapolis MSA	939	133,452	78.58	81,975	83.32	61.87	52.13	7.93	32.37	8.76	5.75
Bloomington MSA	44	5,428	3.68	4,015	81.55	77.27	51.86	8.83	18.18	9.62	4.55
Columbus MSA	14	1,667	1.17	2,389	75.58	64.29	52.24	11.33	35.71	13.09	0.00
Elkhart MSA	27	6,492	2.26	6,716	75.22	33.33	46.62	12.71	51.85	12.07	14.81
Fort Wayne MSA	106	15,054	8.87	13,084	80.16	67.92	53.16	9.18	25.47	10.66	6.60
Lafayette MSA	20	1,419	1.67	4,758	79.46	55.00	53.91	7.75	25.00	12.79	20.00
Michigan City MSA	45	3,398	3.77	3,370	77.84	60.00	49.05	9.30	17.78	12.85	22.22
Total	**1,195**	**166,910**	**100.00**	**116,307**	**81.89**	**62.18**	**51.90**	**8.50**	**31.05**	**9.61**	**6.78**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues										2022 - 2023	
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
2022-2023 IN non-MSA	107	13,116	79.26	7,446	75.33	71.96	56.06	11.42	24.30	13.25	3.74
2022-2023 Terre Haute MSA	28	1,327	20.74	3,071	74.27	85.71	49.59	11.22	14.29	14.51	0.00
Total	**135**	**14,443**	**100.00**	**10,517**	**75.02**	**74.81**	**54.17**	**11.36**	**22.22**	**13.62**	**2.96**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
2024 Evansville MSA	92	7,176	52.57	--	77.52	68.48	--	10.01	22.83	12.47	8.70
2024 IN non-MSA	62	3,402	35.43	--	75.35	87.10	--	10.85	9.68	13.81	3.23
2024 Terre Haute MSA	21	1,463	12.00	--	74.57	71.43	--	10.74	23.81	14.69	4.76
Total	**175**	**12,041**	**100.00**	**--**	**76.13**	**75.43**	**--**	**10.49**	**18.29**	**13.39**	**6.29**

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

State of Kentucky

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2024
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**
Lexington MSA	1,215	229,809	84.32	25,146	3.28	4.12	3.74	17.91	12.59	16.46	40.68	38.93	42.28	37.74	43.87	36.97	0.39	0.49	0.51
Owensboro MSA	226	19,942	15.68	5,680	--	--	--	16.63	17.26	16.14	57.94	59.73	59.24	24.65	22.57	23.36	0.78	0.44	1.25
Total	**1,441**	**249,751**	**100.00**	**30,826**	**2.61**	**3.47**	**3.05**	**17.65**	**13.32**	**16.40**	**44.20**	**42.19**	**45.41**	**35.07**	**40.53**	**34.46**	**0.47**	**0.49**	**0.65**

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

Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2023
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**
2022-2023 KY non-MSA	653	67,738	100.00	13,785	0.45	0.00	0.81	3.58	2.60	3.88	43.30	51.00	39.83	52.67	46.40	55.47	--	--	--
Total	**653**	**67,738**	**100.00**	**13,785**	**0.45**	**0.00**	**0.81**	**3.58**	**2.60**	**3.88**	**43.30**	**51.00**	**39.83**	**52.67**	**46.40**	**55.47**	**--**	**--**	**--**

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

Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2024
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**
2024 KY non-MSA	253	28,489	100.00	--	0.38	0.79	--	3.36	1.98	--	45.32	55.73	--	50.93	41.50	--	--	--	--
Total	**253**	**28,489**	**100.00**	**--**	**0.38**	**0.79**	**--**	**3.36**	**1.98**	**--**	**45.32**	**55.73**	**--**	**50.93**	**41.50**	**--**	**--**	**--**	**--**

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

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2024
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Borrowers**			**Moderate-Income Borrowers**			**Middle-Income Borrowers**			**Upper-Income Borrowers**			**Not Available-Income Borrowers**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**
Lexington MSA	1,215	229,809	84.32	25,146	21.80	12.35	8.07	16.91	21.07	18.77	19.88	23.70	21.22	41.41	38.77	36.77	--	4.12	15.18
Owensboro MSA	226	19,942	15.68	5,680	21.62	23.01	11.25	17.52	28.76	22.45	19.69	26.99	22.01	41.17	19.91	28.22	--	1.33	16.07
Total	**1,441**	**249,751**	**100.00**	**30,826**	**21.76**	**14.02**	**8.66**	**17.03**	**22.28**	**19.44**	**19.85**	**24.22**	**21.37**	**41.36**	**35.81**	**35.19**	**--**	**3.68**	**15.34**

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

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2023
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Borrowers**			**Moderate-Income Borrowers**			**Middle-Income Borrowers**			**Upper-Income Borrowers**			**Not Available-Income Borrowers**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**
2022-2023 KY non-MSA	653	67,738	100.00	13,785	16.10	6.89	3.68	14.04	20.06	13.55	19.30	25.27	22.72	50.57	44.56	42.87	--	3.22	17.19
Total	**653**	**67,738**	**100.00**	**13,785**	**16.10**	**6.89**	**3.68**	**14.04**	**20.06**	**13.55**	**19.30**	**25.27**	**22.72**	**50.57**	**44.56**	**42.87**	**--**	**3.22**	**17.19**

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

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2024**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
2024 KY non-MSA	253	28,489	100.00	--	16.23	7.11	--	13.59	18.97	--	19.24	24.51	--	50.95	47.43	--	--	1.98	--
Total	**253**	**28,489**	**100.00**	**--**	**16.23**	**7.11**	**--**	**13.59**	**18.97**	**--**	**19.24**	**24.51**	**--**	**50.95**	**47.43**	**--**	**--**	**1.98**	**--**

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

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022 - 2024**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Lexington MSA	269	42,003	93.08	21,241	4.66	3.72	4.56	18.46	25.65	17.22	36.09	21.93	38.07	35.03	42.75	35.84	5.76	5.95	4.31
Owensboro MSA	20	922	6.92	3,494	--	--	--	21.23	35.00	22.04	47.55	40.00	47.17	23.13	25.00	26.47	8.08	0.00	4.32
Total	**289**	**42,925**	**100.00**	**24,735**	**4.04**	**3.46**	**3.92**	**18.83**	**26.30**	**17.90**	**37.61**	**23.18**	**39.36**	**33.44**	**41.52**	**34.51**	**6.07**	**5.54**	**4.31**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022 - 2023**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
2022-2023 KY non-MSA	56	3,719	100.00	8,040	1.68	0.00	1.22	14.73	3.57	8.68	36.76	35.71	39.69	46.82	60.71	50.41	0.01	0.00	--
Total	**56**	**3,719**	**100.00**	**8,040**	**1.68**	**0.00**	**1.22**	**14.73**	**3.57**	**8.68**	**36.76**	**35.71**	**39.69**	**46.82**	**60.71**	**50.41**	**0.01**	**0.00**	**--**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2024
Assessment Area:	**Total Loans to Small Businesses**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**
2024 KY non-MSA	43	3,909	100.00	--	1.41	0.00	--	13.78	0.00	--	39.11	53.49	--	45.69	46.51	--	0.01	0.00	--
Total	**43**	**3,909**	**100.00**	**--**	**1.41**	**0.00**	**--**	**13.78**	**0.00**	**--**	**39.11**	**53.49**	**--**	**45.69**	**46.51**	**--**	**0.01**	**0.00**	**--**

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2024
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
Lexington MSA	269	42,003	93.08	21,241	81.67	62.45	53.21	8.41	32.34	9.92	5.20
Owensboro MSA	20	922	6.92	3,494	76.64	80.00	56.47	10.41	15.00	12.95	5.00
Total	**289**	**42,925**	**100.00**	**24,735**	**81.00**	**63.67**	**53.67**	**8.67**	**31.14**	**10.32**	**5.19**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2023
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
2022-2023 KY non-MSA	56	3,719	100.00	8,040	77.78	71.43	58.47	8.79	19.64	13.44	8.93
Total	**56**	**3,719**	**100.00**	**8,040**	**77.78**	**71.43**	**58.47**	**8.79**	**19.64**	**13.44**	**8.93**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2024											
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
2024 KY non-MSA	43	3,909	100.00	--	78.15	69.77	--	8.22	23.26	13.63	6.98
Total	**43**	**3,909**	**100.00**	**--**	**78.15**	**69.77**	**--**	**8.22**	**23.26**	**13.63**	**6.98**

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

State of Michigan

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**
Detroit MSA	5,103	797,657	35.11	209,179	4.51	2.61	3.59	21.28	17.62	19.40	34.94	38.78	36.77	38.82	40.88	39.90	0.46	0.12	0.33
Grand Rapids MSA	4,892	806,769	33.65	60,634	1.39	1.53	2.38	15.38	15.00	18.14	49.37	47.77	47.35	32.79	34.61	31.30	1.07	1.08	0.82
Ann Arbor MSA	246	65,776	1.69	16,083	4.72	4.47	5.71	8.65	6.50	9.82	46.92	50.81	49.74	39.34	37.80	33.91	0.37	0.41	0.77
Battle Creek MSA	398	52,407	2.74	7,003	3.88	5.53	4.66	21.50	24.37	22.65	41.66	38.44	40.58	32.96	31.66	32.09	--	--	--
Bay City MSA	83	8,662	0.57	4,726	--	--	--	24.05	19.28	23.70	52.38	51.81	54.72	22.85	26.51	20.50	0.72	2.41	1.08
Flint MSA	392	41,277	2.70	20,161	6.71	2.04	2.57	17.46	14.54	12.00	33.48	25.77	34.94	39.88	54.34	48.41	2.47	3.32	2.07
Jackson MSA	265	31,124	1.82	7,994	1.76	1.13	1.88	23.51	27.17	24.98	42.98	47.17	42.42	31.66	24.53	29.77	0.09	--	0.34
Kalamazoo MSA	818	127,091	5.63	14,604	2.80	0.98	3.73	18.44	16.01	20.62	42.65	40.83	39.55	36.00	41.93	35.81	0.12	0.24	0.29
Midland MSA	84	10,054	0.58	4,295	2.17	1.19	2.10	16.48	14.29	18.37	58.91	54.76	56.76	22.45	29.76	22.77	--	--	--
Monroe MSA	639	73,989	4.40	8,767	2.77	0.31	2.65	10.75	10.64	10.40	61.18	58.37	61.77	25.30	30.67	25.16	--	--	0.01
Muskegon MSA	903	99,058	6.21	10,242	5.88	4.10	6.89	10.52	11.96	12.26	52.84	44.96	51.17	30.75	38.98	29.63	--	--	--
Niles MSA	578	79,016	3.98	9,093	5.58	2.25	2.89	13.56	15.74	15.20	43.98	44.29	43.99	36.31	37.72	37.60	0.56	0.00	0.32
Saginaw MSA	135	17,038	0.93	7,581	2.80	0.00	1.24	21.27	16.30	19.52	34.26	42.22	34.18	41.66	41.48	45.02	--	--	--
Total	**14,536**	**2,209,918**	**100.00**	**380,362**	**3.97**	**2.15**	**3.36**	**19.00**	**15.98**	**18.17**	**39.66**	**43.58**	**40.74**	**36.77**	**37.75**	**37.21**	**0.59**	**0.53**	**0.49**

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

Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2023
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**
2022-2023 Lansing MSA	1,158	130,576	35.82	25,782	2.15	2.25	2.68	15.19	12.35	17.32	52.30	54.49	52.04	30.23	30.83	27.76	0.13	0.09	0.17
2022-2023 MI non-MSA	2,075	294,217	64.18	39,483	0.31	0.39	0.21	8.72	7.57	8.39	66.44	62.94	63.27	24.36	28.82	27.78	0.17	0.29	0.22
Total	**3,233**	**424,793**	**100.00**	**65,265**	**1.01**	**1.05**	**1.19**	**11.20**	**9.28**	**11.92**	**61.01**	**59.91**	**58.83**	**26.61**	**29.54**	**27.77**	**0.16**	**0.22**	**0.20**

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

Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2024
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**
2024 Lansing MSA	299	39,196	28.31	--	2.52	1.67	--	15.34	18.73	--	49.39	51.84	--	32.59	27.42	--	0.16	0.33	--
2024 MI non-MSA	587	83,776	55.59	--	0.04	0.00	--	6.48	6.98	--	69.11	62.01	--	24.18	30.32	--	0.19	0.68	--
2024 Traverse City MSA	170	40,569	16.10	--	--	--	--	8.01	7.06	--	61.96	64.12	--	30.03	28.82	--	--	--	--
Total	**1,056**	**163,540**	**100.00**	**--**	**0.85**	**0.47**	**--**	**9.53**	**10.32**	**--**	**61.95**	**59.47**	**--**	**27.51**	**29.26**	**--**	**0.16**	**0.47**	**--**

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

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2024
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Borrowers**			**Moderate-Income Borrowers**			**Middle-Income Borrowers**			**Upper-Income Borrowers**			**Not Available-Income Borrowers**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**
Detroit MSA	5,103	797,657	35.11	209,179	21.80	14.11	11.86	16.98	23.63	22.51	19.91	23.99	22.91	41.31	34.45	31.16	--	3.82	11.56
Grand Rapids MSA	4,892	806,769	33.65	60,634	18.13	16.97	10.27	18.18	25.94	23.38	23.05	23.41	23.46	40.65	29.03	31.92	--	4.66	10.96
Ann Arbor MSA	246	65,776	1.69	16,083	20.80	6.10	11.73	17.66	23.17	21.72	21.43	27.24	21.94	40.11	41.06	33.74	--	2.44	10.87
Battle Creek MSA	398	52,407	2.74	7,003	21.87	13.32	10.94	17.19	36.18	26.40	19.75	25.38	24.93	41.19	22.36	26.20	--	2.76	11.52
Bay City MSA	83	8,662	0.57	4,726	21.03	13.25	16.72	17.50	26.51	24.90	20.48	31.33	22.37	41.00	26.51	23.76	--	2.41	12.25
Flint MSA	392	41,277	2.70	20,161	21.26	13.52	8.28	17.47	27.30	20.79	20.76	22.70	23.76	40.50	30.36	31.16	--	6.12	16.01
Jackson MSA	265	31,124	1.82	7,994	18.75	16.23	14.92	19.04	29.06	25.39	20.95	22.26	22.50	41.27	27.92	25.32	--	4.53	11.86
Kalamazoo MSA	818	127,091	5.63	14,604	21.46	13.81	11.91	18.32	26.04	22.48	19.68	23.35	22.40	40.54	33.62	31.38	--	3.18	11.83
Midland MSA	84	10,054	0.58	4,295	19.78	11.90	14.34	18.15	33.33	24.03	22.03	21.43	21.47	40.04	32.14	27.24	--	1.19	12.92
Monroe MSA	639	73,989	4.40	8,767	19.63	12.36	9.95	18.22	27.39	23.94	22.39	24.10	25.57	39.76	34.12	27.75	--	2.03	12.79
Muskegon MSA	903	99,058	6.21	10,242	20.37	15.50	9.15	18.69	25.36	23.39	21.16	26.80	23.62	39.77	26.58	29.26	--	5.76	14.58
Niles MSA	578	79,016	3.98	9,093	22.82	19.20	9.94	17.71	23.53	18.78	17.77	21.28	21.40	41.70	33.22	39.33	--	2.77	10.55
Saginaw MSA	135	17,038	0.93	7,581	20.70	12.59	9.09	17.66	17.78	21.78	21.24	25.93	23.22	40.39	38.52	32.79	--	5.19	13.12
Total	**14,536**	**2,209,918**	**100.00**	**380,362**	**21.02**	**15.10**	**11.33**	**17.42**	**25.36**	**22.66**	**20.57**	**23.90**	**23.04**	**40.99**	**31.56**	**31.14**	**--**	**4.08**	**11.83**

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

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2023
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Borrowers**			**Moderate-Income Borrowers**			**Middle-Income Borrowers**			**Upper-Income Borrowers**			**Not Available-Income Borrowers**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**
2022-2023 Lansing MSA	1,158	130,576	35.82	25,782	20.27	17.88	13.14	17.83	28.84	25.14	21.98	23.49	23.40	39.91	25.99	26.46	--	3.80	11.86
2022-2023 MI non-MSA	2,075	294,217	64.18	39,483	17.74	13.83	6.88	17.75	23.47	19.46	22.24	25.20	22.58	42.26	33.11	40.57	--	4.39	10.52
Total	**3,233**	**424,793**	**100.00**	**65,265**	**18.74**	**15.28**	**9.35**	**17.78**	**25.39**	**21.70**	**22.14**	**24.59**	**22.91**	**41.34**	**30.56**	**34.99**	**--**	**4.18**	**11.05**

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

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2024
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Borrowers**			**Moderate-Income Borrowers**			**Middle-Income Borrowers**			**Upper-Income Borrowers**			**Not Available-Income Borrowers**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**
2024 Lansing MSA	299	39,196	28.31	--	20.30	12.71	--	17.23	33.11	--	21.90	19.40	--	40.57	31.44	--	--	3.34	--
2024 MI non-MSA	587	83,776	55.59	--	17.53	11.58	--	17.85	25.38	--	22.44	25.04	--	42.18	35.09	--	--	2.90	--
2024 Traverse City MSA	170	40,569	16.10	--	17.46	8.82	--	16.89	27.65	--	23.64	25.88	--	42.01	35.88	--	--	1.76	--
Total	**1,056**	**163,540**	**100.00**	**--**	**18.46**	**11.46**	**--**	**17.55**	**27.94**	**--**	**22.36**	**23.58**	**--**	**41.63**	**34.19**	**--**	**--**	**2.84**	**--**

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

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2024
Assessment Area:	**Total Loans to Small Businesses**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**
Detroit MSA	2,198	381,202	50.47	203,436	7.01	5.64	5.71	22.56	24.84	20.23	30.21	30.30	31.00	38.18	37.58	41.05	2.04	1.64	2.01
Grand Rapids MSA	1,197	185,003	27.49	37,021	2.14	2.92	2.00	19.06	22.47	18.40	43.30	40.60	43.43	34.74	32.75	35.51	0.77	1.25	0.65
Ann Arbor MSA	59	7,559	1.35	16,217	7.93	10.17	6.51	9.59	3.39	8.37	40.65	45.76	43.41	37.89	38.98	39.96	3.93	1.69	1.74
Battle Creek MSA	54	8,585	1.24	2,531	5.79	3.70	4.90	31.15	53.70	26.71	37.78	22.22	37.38	25.28	20.37	31.02	--	--	--
Bay City MSA	14	597	0.32	2,089	--	--	--	29.24	35.71	27.19	46.32	42.86	47.63	22.74	21.43	24.13	1.70	0.00	1.05
Flint MSA	151	29,119	3.47	10,282	5.64	5.30	3.48	19.39	21.85	16.89	33.06	26.49	30.88	35.77	39.07	43.17	6.13	7.28	5.57
Jackson MSA	34	7,126	0.78	3,682	3.32	--	2.58	29.07	29.41	29.36	37.69	32.35	38.54	23.98	29.41	25.69	5.94	8.82	3.83
Kalamazoo MSA	201	26,361	4.62	7,577	7.08	4.48	6.74	18.40	26.87	16.51	40.57	36.32	39.08	33.54	32.34	37.46	0.41	0.00	0.21
Midland MSA	32	3,227	0.73	2,287	6.10	9.38	4.33	20.89	12.50	18.06	46.51	46.88	51.25	26.50	31.25	26.37	--	--	--
Monroe MSA	93	11,793	2.14	4,472	3.52	2.15	1.79	12.63	8.60	11.61	61.12	63.44	64.92	22.73	25.81	21.67	--	--	0.02
Muskegon MSA	159	23,367	3.65	3,858	12.06	9.43	9.15	16.41	26.42	19.52	45.56	37.74	45.33	25.98	26.42	26.00	--	--	--
Niles MSA	104	9,948	2.39	4,784	10.79	5.77	7.32	13.15	26.92	11.64	39.32	47.12	41.49	36.20	20.19	39.42	0.54	0.00	0.13
Saginaw MSA	59	9,921	1.35	4,323	4.74	10.17	3.15	28.21	59.32	22.88	30.54	13.56	31.53	36.52	16.95	42.45	--	--	--
Total	**4,355**	**703,808**	**100.00**	**302,559**	**6.34**	**4.96**	**5.13**	**21.22**	**24.45**	**19.12**	**34.00**	**34.72**	**34.66**	**36.44**	**34.35**	**39.31**	**2.00**	**1.52**	**1.78**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2023
Assessment Area:	**Total Loans to Small Businesses**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**
2022-2023 Lansing MSA	199	36,313	31.69	14,351	4.53	5.53	4.27	21.46	19.10	17.26	44.79	42.71	44.09	25.98	30.15	32.74	3.23	2.51	1.64
2022-2023 MI non-MSA	429	71,678	68.31	24,119	0.35	0.00	0.26	10.68	11.66	9.04	60.25	62.24	59.70	27.92	24.24	30.51	0.81	1.86	0.49
Total	**628**	**107,991**	**100.00**	**38,470**	**2.02**	**1.75**	**1.76**	**14.99**	**14.01**	**12.11**	**54.07**	**56.05**	**53.88**	**27.14**	**26.11**	**31.34**	**1.78**	**2.07**	**0.92**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2024
Assessment Area:	**Total Loans to Small Businesses**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**
2024 Lansing MSA	96	9,631	34.41	--	4.91	17.71	--	21.57	28.13	--	43.75	22.92	--	26.76	30.21	--	3.01	1.04	--
2024 MI non-MSA	141	16,519	50.54	--	0.19	0.00	--	9.88	31.91	--	65.86	48.94	--	23.18	18.44	--	0.89	0.71	--
2024 Traverse City MSA	42	8,083	15.05	--	--	--	--	9.15	14.29	--	58.96	61.90	--	31.89	23.81	--	--	--	--
Total	**279**	**34,233**	**100.00**	**--**	**1.99**	**6.09**	**--**	**14.30**	**27.96**	**--**	**56.31**	**41.94**	**--**	**25.82**	**23.30**	**--**	**1.58**	**0.72**	**--**

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2024
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
Detroit MSA	2,198	381,202	50.47	203,436	83.70	55.28	51.36	8.61	39.08	7.69	5.64
Grand Rapids MSA	1,197	185,003	27.49	37,021	79.97	57.39	49.66	10.08	36.26	9.95	6.35
Ann Arbor MSA	59	7,559	1.35	16,217	80.67	61.02	51.19	9.44	18.64	9.89	20.34
Battle Creek MSA	54	8,585	1.24	2,531	74.77	48.15	51.52	11.76	50.00	13.47	1.85
Bay City MSA	14	597	0.32	2,089	74.75	64.29	52.32	11.13	21.43	14.12	14.29
Flint MSA	151	29,119	3.47	10,282	81.20	49.01	49.57	9.11	42.38	9.68	8.61
Jackson MSA	34	7,126	0.78	3,682	77.43	44.12	50.46	10.95	52.94	11.63	2.94
Kalamazoo MSA	201	26,361	4.62	7,577	78.10	55.22	50.20	10.94	40.30	10.96	4.48
Midland MSA	32	3,227	0.73	2,287	78.26	62.50	59.69	10.90	18.75	10.83	18.75
Monroe MSA	93	11,793	2.14	4,472	79.58	59.14	60.00	10.05	33.33	10.37	7.53
Muskegon MSA	159	23,367	3.65	3,858	78.10	56.60	52.44	10.51	36.48	11.39	6.92
Niles MSA	104	9,948	2.39	4,784	76.74	62.50	54.16	11.24	28.85	12.01	8.65
Saginaw MSA	59	9,921	1.35	4,323	76.48	55.93	49.16	10.89	40.68	12.64	3.39
Total	**4,355**	**703,808**	**100.00**	**302,559**	**82.10**	**55.94**	**51.27**	**9.17**	**37.80**	**8.73**	**6.27**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
2022-2023 Lansing MSA	199	36,313	31.69	14,351	74.48	49.75	51.95	11.98	44.22	13.54	6.03
2022-2023 MI non-MSA	429	71,678	68.31	24,119	74.04	58.97	55.24	13.12	34.27	12.84	6.76
Total	**628**	**107,991**	**100.00**	**38,470**	**74.21**	**56.05**	**54.01**	**12.66**	**37.42**	**13.12**	**6.53**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
2024 Lansing MSA	96	9,631	34.41	--	80.14	61.46	--	8.81	28.13	11.04	10.42
2024 MI non-MSA	141	16,519	50.54	--	76.85	63.12	--	10.81	27.66	12.34	9.22
2024 Traverse City MSA	42	8,083	15.05	--	80.95	54.76	--	9.73	35.71	9.32	9.52
Total	**279**	**34,233**	**100.00**	**--**	**78.71**	**61.29**	**--**	**9.88**	**29.03**	**11.40**	**9.68**

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

State of North Carolina

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2024
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**
Raleigh MSA	1,186	457,655	59.03	83,719	2.99	5.40	3.43	14.83	21.16	15.90	36.18	31.37	39.88	44.71	40.56	39.34	1.30	1.52	1.45
Asheville MSA	99	32,050	4.93	14,951	1.42	0.00	1.99	18.03	20.20	15.46	52.34	45.45	50.65	28.21	34.34	31.88	--	--	--
Durham MSA	244	82,876	12.15	27,085	5.06	3.28	6.55	13.13	11.89	16.56	36.73	32.79	33.95	45.06	52.05	42.94	0.02	0.00	0.00
Hickory MSA	139	28,004	6.92	10,459	--	--	--	11.30	5.76	10.47	49.57	42.45	46.57	39.13	51.80	42.94	--	--	--
NC non-MSA	341	53,318	16.97	14,364	0.68	0.88	1.45	15.55	10.85	14.73	70.29	65.69	66.14	13.49	22.58	17.66	--	--	--
Total	**2,009**	**653,903**	**100.00**	**150,578**	**2.65**	**3.73**	**3.42**	**14.70**	**17.17**	**15.48**	**43.85**	**38.83**	**42.85**	**38.18**	**39.37**	**37.43**	**0.62**	**0.90**	**0.80**

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

Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2023
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**
2022-2023 Charlotte MSA	2,516	523,196	100.00	142,201	1.92	1.35	2.53	24.37	16.73	21.49	32.90	36.37	34.22	40.52	45.27	41.41	0.29	0.28	0.34
Total	**2,516**	**523,196**	**100.00**	**142,201**	**1.92**	**1.35**	**2.53**	**24.37**	**16.73**	**21.49**	**32.90**	**36.37**	**34.22**	**40.52**	**45.27**	**41.41**	**0.29**	**0.28**	**0.34**

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

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2024
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Borrowers**			**Moderate-Income Borrowers**			**Middle-Income Borrowers**			**Upper-Income Borrowers**			**Not Available-Income Borrowers**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**
Raleigh MSA	1,186	457,655	59.03	83,719	19.49	7.76	6.26	15.74	20.15	16.16	20.37	22.77	23.18	44.40	46.46	42.62	--	2.87	11.78
Asheville MSA	99	32,050	4.93	14,951	19.35	4.04	5.24	18.39	18.18	14.76	20.63	26.26	20.27	41.63	49.49	49.33	--	2.02	10.40
Durham MSA	244	82,876	12.15	27,085	22.47	6.15	5.93	15.71	13.11	16.44	18.62	17.21	21.48	43.20	61.48	44.93	--	2.05	11.23
Hickory MSA	139	28,004	6.92	10,459	16.14	10.07	5.09	18.38	16.55	17.20	21.07	15.83	21.19	44.41	53.96	43.20	--	3.60	13.33
NC non-MSA	341	53,318	16.97	14,364	22.52	9.38	5.11	19.76	19.65	15.93	19.38	33.14	22.18	38.35	36.66	44.31	--	1.17	12.48
Total	**2,009**	**653,903**	**100.00**	**150,578**	**20.17**	**7.81**	**5.91**	**16.73**	**18.87**	**16.12**	**19.99**	**23.54**	**22.35**	**43.11**	**47.29**	**43.90**	**--**	**2.49**	**11.72**

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

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2023
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Borrowers**			**Moderate-Income Borrowers**			**Middle-Income Borrowers**			**Upper-Income Borrowers**			**Not Available-Income Borrowers**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**
2022-2023 Charlotte MSA	2,516	523,196	100.00	142,201	20.76	11.80	6.20	17.39	21.82	16.33	19.38	24.32	21.29	42.47	38.47	42.64	--	3.58	13.55
Total	**2,516**	**523,196**	**100.00**	**142,201**	**20.76**	**11.80**	**6.20**	**17.39**	**21.82**	**16.33**	**19.38**	**24.32**	**21.29**	**42.47**	**38.47**	**42.64**	**--**	**3.58**	**13.55**

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

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2022 - 2024		
Assessment Area:	**Total Loans to Small Businesses**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**
Raleigh MSA	177	33,154	51.01	71,702	4.91	7.34	4.57	15.53	14.69	15.39	35.38	31.07	34.37	43.00	44.63	44.07	1.17	2.26	1.60
Asheville MSA	24	3,909	6.92	16,909	1.08	0.00	1.33	21.81	20.83	20.42	51.69	54.17	49.48	25.42	25.00	28.77	--	--	--
Durham MSA	37	5,899	10.66	24,516	8.77	10.81	5.67	15.97	8.11	16.37	35.11	27.03	36.28	37.95	45.95	40.37	2.20	8.11	1.30
Hickory MSA	38	7,855	10.95	6,979	--	--	--	16.55	15.79	16.15	43.40	55.26	43.99	40.05	28.95	39.86	--	--	--
NC non-MSA	71	5,585	20.46	9,611	2.19	4.23	1.14	19.15	22.54	16.15	60.80	52.11	64.44	17.86	21.13	18.27	--	--	--
Total	**347**	**56,402**	**100.00**	**129,717**	**4.70**	**5.76**	**3.85**	**16.74**	**16.14**	**16.33**	**39.63**	**39.19**	**39.45**	**37.86**	**36.89**	**39.24**	**1.07**	**2.02**	**1.13**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2022 - 2023		
Assessment Area:	**Total Loans to Small Businesses**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**
2022-2023 Charlotte MSA	785	108,763	100.00	136,498	4.21	5.48	3.84	25.09	20.89	23.46	27.66	36.82	29.81	41.28	36.18	41.57	1.75	0.64	1.32
Total	**785**	**108,763**	**100.00**	**136,498**	**4.21**	**5.48**	**3.84**	**25.09**	**20.89**	**23.46**	**27.66**	**36.82**	**29.81**	**41.28**	**36.18**	**41.57**	**1.75**	**0.64**	**1.32**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues								2022 - 2024			
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
Raleigh MSA	177	33,154	51.01	71,702	86.21	63.84	52.46	6.33	31.07	7.46	5.08
Asheville MSA	24	3,909	6.92	16,909	85.27	70.83	54.21	7.48	29.17	7.25	0.00
Durham MSA	37	5,899	10.66	24,516	85.27	72.97	53.91	6.86	24.32	7.87	2.70
Hickory MSA	38	7,855	10.95	6,979	79.93	36.84	55.57	10.15	44.74	9.93	18.42
NC non-MSA	71	5,585	20.46	9,611	81.85	70.42	59.05	8.50	26.76	9.65	2.82
Total	**347**	**56,402**	**100.00**	**129,717**	**85.27**	**63.69**	**53.62**	**6.93**	**30.84**	**7.80**	**5.48**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues								2022 - 2023			
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
2022-2023 Charlotte MSA	785	108,763	100.00	136,498	85.05	66.11	52.89	7.48	30.70	7.47	3.18
Total	**785**	**108,763**	**100.00**	**136,498**	**85.05**	**66.11**	**52.89**	**7.48**	**30.70**	**7.47**	**3.18**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

State of Ohio

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2024
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**
Columbus MSA	6,580	1,345,892	39.48	121,809	4.65	4.47	5.89	16.53	13.86	16.09	37.35	33.60	36.38	41.23	47.77	40.81	0.25	0.30	0.46
Dayton MSA	3,660	400,570	21.96	45,304	5.24	2.73	4.20	17.54	14.34	17.19	41.11	46.72	40.90	35.87	35.96	37.48	0.24	0.25	0.17
Akron MSA	2,050	307,109	12.30	40,540	5.14	3.56	5.09	17.37	11.71	17.95	42.85	40.68	41.32	34.50	44.00	35.16	0.15	0.05	0.27
Canton MSA	729	104,069	4.37	21,014	3.49	1.23	2.96	11.14	9.47	11.08	52.93	45.68	52.38	32.45	43.62	33.42	--	--	--
Lima MSA	239	22,673	1.43	4,972	5.10	2.51	3.28	18.73	22.59	21.04	50.30	50.63	46.34	25.88	24.27	29.28	--	--	--
Springfield MSA	285	29,401	1.71	6,986	4.43	3.51	2.65	14.59	12.98	18.22	42.84	49.12	44.69	38.14	34.39	34.27	--	--	--
Toledo MSA	3,123	351,050	18.74	27,366	4.46	2.82	2.73	15.11	15.18	14.44	38.95	33.43	39.46	39.47	46.75	41.83	2.00	1.83	1.26
Total	**16,666**	**2,560,765**	**100.00**	**267,991**	**4.71**	**3.48**	**4.80**	**16.18**	**13.87**	**16.14**	**40.98**	**38.36**	**39.86**	**37.71**	**43.77**	**38.53**	**0.42**	**0.52**	**0.41**

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

Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2023
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**
2022-2023 Cleveland MSA	5,663	889,821	100.00	114,335	5.69	2.95	4.75	14.97	11.20	14.60	39.91	41.44	40.96	38.53	44.09	39.08	0.90	0.32	0.53
Total	**5,663**	**889,821**	**100.00**	**114,335**	**5.69**	**2.95**	**4.75**	**14.97**	**11.20**	**14.60**	**39.91**	**41.44**	**40.96**	**38.53**	**44.09**	**39.08**	**0.90**	**0.32**	**0.53**

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

Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2023
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**
2022-2023 OH non-MSA	2,479	260,168	100.00	41,862	1.15	1.13	1.19	11.73	14.60	12.49	60.05	60.31	60.31	27.07	23.96	25.89	--	--	--
Total	**2,479**	**260,168**	**100.00**	**41,862**	**1.15**	**1.13**	**1.19**	**11.73**	**14.60**	**12.49**	**60.05**	**60.31**	**60.31**	**27.07**	**23.96**	**25.89**	**--**	**--**	**--**

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

Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2024
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**
2024 OH non-MSA	815	87,422	26.39	--	0.91	0.49	--	11.70	16.20	--	60.44	60.49	--	26.95	22.82	--	--	--	--
2024 Sandusky MSA	50	5,626	1.62	--	2.43	0.00	--	22.37	20.00	--	60.78	70.00	--	14.42	10.00	--	--	--	--
2024 Cleveland MSA	2,223	379,722	71.99	--	5.42	6.03	--	14.78	21.64	--	38.53	34.91	--	40.37	37.20	--	0.90	0.22	--
Total	**3,088**	**472,770**	**100.00**	**--**	**4.02**	**4.47**	**--**	**14.08**	**20.17**	**--**	**45.54**	**42.23**	**--**	**35.75**	**32.97**	**--**	**0.61**	**0.16**	**--**

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

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2024
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Borrowers**			**Moderate-Income Borrowers**			**Middle-Income Borrowers**			**Upper-Income Borrowers**			**Not Available-Income Borrowers**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**
Columbus MSA	6,580	1,345,892	39.48	121,809	21.51	12.51	8.19	17.07	22.25	19.36	20.13	23.09	21.75	41.29	39.35	35.55	--	2.81	15.16
Dayton MSA	3,660	400,570	21.96	45,304	21.55	20.77	10.96	16.89	25.82	20.68	20.94	22.98	22.38	40.62	26.97	30.38	--	3.47	15.59
Akron MSA	2,050	307,109	12.30	40,540	20.72	12.59	11.07	17.68	24.88	22.20	21.26	25.12	21.75	40.35	34.78	31.15	--	2.63	13.83
Canton MSA	729	104,069	4.37	21,014	19.53	9.33	10.12	18.62	22.63	23.74	21.44	25.10	22.54	40.41	40.05	30.09	--	2.88	13.51
Lima MSA	239	22,673	1.43	4,972	19.18	14.23	9.61	18.97	28.03	24.94	22.40	24.27	22.87	39.45	29.29	30.19	--	4.18	12.39
Springfield MSA	285	29,401	1.71	6,986	20.34	10.53	8.53	17.37	27.72	22.82	21.75	27.37	23.86	40.54	31.23	28.10	--	3.16	16.69
Toledo MSA	3,123	351,050	18.74	27,366	22.37	15.05	11.28	16.37	25.39	23.09	19.86	24.78	22.94	41.40	31.99	32.26	--	2.79	10.43
Total	**16,666**	**2,560,765**	**100.00**	**267,991**	**21.25**	**14.66**	**9.59**	**17.22**	**24.14**	**20.93**	**20.62**	**23.81**	**22.11**	**40.91**	**34.44**	**32.95**	**--**	**2.96**	**14.41**

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

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2023
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Borrowers**			**Moderate-Income Borrowers**			**Middle-Income Borrowers**			**Upper-Income Borrowers**			**Not Available-Income Borrowers**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**
2022-2023 Cleveland MSA	5,663	889,821	100.00	114,335	22.27	12.84	10.04	17.19	26.66	21.77	19.47	23.13	20.85	41.07	34.20	32.70	--	3.16	14.65
Total	**5,663**	**889,821**	**100.00**	**114,335**	**22.27**	**12.84**	**10.04**	**17.19**	**26.66**	**21.77**	**19.47**	**23.13**	**20.85**	**41.07**	**34.20**	**32.70**	**--**	**3.16**	**14.65**

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

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2022 - 2023**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
2022-2023 OH non-MSA	2,479	260,168	100.00	41,862	19.07	12.87	9.02	17.67	26.58	23.37	21.85	28.04	24.45	41.41	28.44	28.86	--	4.07	14.30
Total	**2,479**	**260,168**	**100.00**	**41,862**	**19.07**	**12.87**	**9.02**	**17.67**	**26.58**	**23.37**	**21.85**	**28.04**	**24.45**	**41.41**	**28.44**	**28.86**	**--**	**4.07**	**14.30**

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

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2024**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
2024 OH non-MSA	815	87,422	26.39	--	19.14	14.23	--	17.59	28.59	--	21.70	26.13	--	41.57	29.20	--	--	1.84	--
2024 Sandusky MSA	50	5,626	1.62	--	18.44	18.00	--	20.42	42.00	--	22.85	18.00	--	38.28	18.00	--	--	4.00	--
2024 Cleveland MSA	2,223	379,722	71.99	--	21.81	15.11	--	16.98	24.34	--	19.28	22.90	--	41.93	35.67	--	--	1.98	--
Total	**3,088**	**472,770**	**100.00**	**--**	**20.93**	**14.93**	**--**	**17.25**	**25.74**	**--**	**20.09**	**23.67**	**--**	**41.72**	**33.68**	**--**	**--**	**1.98**	**--**

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

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022 - 2024**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Columbus MSA	1,280	151,915	43.23	86,081	9.48	11.33	7.29	18.30	18.67	14.36	31.82	30.16	31.67	39.24	38.98	45.90	1.17	0.86	0.78
Dayton MSA	742	104,914	25.06	26,274	8.43	7.55	6.73	18.71	23.18	16.11	34.44	32.61	34.15	37.85	36.39	42.73	0.57	0.27	0.28
Akron MSA	308	51,829	10.40	28,305	9.91	6.82	6.03	15.73	17.21	13.76	35.49	37.01	37.24	36.10	38.64	41.61	2.78	0.32	1.36
Canton MSA	70	7,867	2.36	12,761	4.48	7.14	4.44	11.70	10.00	10.00	40.31	38.57	47.92	43.51	44.29	37.65	--	--	--
Lima MSA	42	2,150	1.42	2,464	7.39	2.38	6.49	26.44	45.24	19.56	42.28	23.81	46.35	23.89	28.57	27.60	--	--	--

Springfield MSA	32	4,611	1.08	3,095	6.08	--	4.23	20.70	12.50	17.54	40.58	37.50	38.64	32.63	50.00	39.58	--	--	--
Toledo MSA	487	69,381	16.45	17,578	8.01	9.45	6.05	17.76	23.82	14.34	32.53	25.87	35.69	34.72	33.26	38.80	6.97	7.60	5.12
Total	**2,961**	**392,667**	**100.00**	**176,558**	**8.69**	**9.25**	**6.61**	**17.54**	**20.60**	**14.34**	**33.93**	**30.97**	**34.83**	**37.99**	**37.45**	**43.07**	**1.84**	**1.72**	**1.15**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022 - 2023**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
2022-2023 Cleveland MSA	792	128,916	100.00	90,386	9.54	5.18	7.11	16.67	12.88	14.64	30.42	30.56	31.26	41.65	50.38	45.75	1.72	1.01	1.23
Total	**792**	**128,916**	**100.00**	**90,386**	**9.54**	**5.18**	**7.11**	**16.67**	**12.88**	**14.64**	**30.42**	**30.56**	**31.26**	**41.65**	**50.38**	**45.75**	**1.72**	**1.01**	**1.23**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022 - 2023**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
2022-2023 OH non-MSA	281	35,654	100.00	24,513	2.79	3.56	1.90	15.86	14.95	12.22	55.79	55.87	57.12	25.55	25.62	28.75	0.01	0.00	0.01
Total	**281**	**35,654**	**100.00**	**24,513**	**2.79**	**3.56**	**1.90**	**15.86**	**14.95**	**12.22**	**55.79**	**55.87**	**57.12**	**25.55**	**25.62**	**28.75**	**0.01**	0.00	**0.01**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2024
Assessment Area:	**Total Loans to Small Businesses**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**
2024 OH non-MSA	187	11,109	30.66	--	2.51	1.07	--	16.20	48.66	--	56.66	37.43	--	24.63	12.83	--	0.01	--	--
2024 Sandusky MSA	11	849	1.80	--	3.67	0.00	--	22.55	27.27	--	57.51	72.73	--	16.27	0.00	--	--	--	--
2024 Cleveland MSA	412	56,805	67.54	--	9.15	8.50	--	16.48	26.46	--	29.55	22.57	--	43.06	41.26	--	1.76	1.21	--
Total	**610**	**68,763**	**100.00**	**--**	**7.74**	**6.07**	**--**	**16.57**	**33.28**	**--**	**35.44**	**28.03**	**--**	**38.87**	**31.80**	**--**	**1.38**	**0.82**	**--**

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											
										2022 - 2024	
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
Columbus MSA	1,280	151,915	43.23	86,081	82.78	64.92	54.47	8.02	28.52	9.19	6.56
Dayton MSA	742	104,914	25.06	26,274	79.90	61.05	54.64	9.43	33.29	10.66	5.66
Akron MSA	308	51,829	10.40	28,305	80.73	57.14	50.37	9.79	33.12	9.48	9.74
Canton MSA	70	7,867	2.36	12,761	82.47	70.00	49.10	8.06	28.57	9.47	1.43
Lima MSA	42	2,150	1.42	2,464	74.41	80.95	52.48	11.39	16.67	14.20	2.38
Springfield MSA	32	4,611	1.08	3,095	78.59	53.13	56.83	9.93	40.63	11.48	6.25
Toledo MSA	487	69,381	16.45	17,578	79.26	63.66	52.74	9.83	31.21	10.91	5.13
Total	**2,961**	**392,667**	**100.00**	**176,558**	**81.37**	**63.15**	**53.29**	**8.82**	**30.60**	**9.81**	**6.25**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues								2022 - 2023			
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
2022-2023 Cleveland MSA	792	128,916	100.00	90,386	82.35	58.96	51.48	9.71	35.73	7.94	5.30
Total	**792**	**128,916**	**100.00**	**90,386**	**82.35**	**58.96**	**51.48**	**9.71**	**35.73**	**7.94**	**5.30**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues								2022 - 2023			
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
2022-2023 OH non-MSA	281	35,654	100.00	24,513	75.68	71.89	59.59	11.07	25.98	13.24	2.14
Total	**281**	**35,654**	**100.00**	**24,513**	**75.68**	**71.89**	**59.59**	**11.07**	**25.98**	**13.24**	**2.14**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues								2024			
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
2024 OH non-MSA	187	11,109	30.66	--	75.56	62.03	--	10.68	19.79	13.77	18.18
2024 Sandusky MSA	11	849	1.80	--	77.38	72.73	--	10.75	27.27	11.87	--
2024 Cleveland MSA	412	56,805	67.54	--	82.44	59.95	--	9.14	33.01	8.42	7.04
Total	**610**	**68,763**	**100.00**	**--**	**80.99**	**60.82**	**--**	**9.47**	**28.85**	**9.54**	**10.33**

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 11: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022 - 2023
Assessment Area:	**Total Loans to Farm**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Farms**	**% Bank Loans**	**% Aggregate**	**% Farms**	**% Bank Loans**	**% Aggregate**	**% Farms**	**% Bank Loans**	**% Aggregate**	**% Farms**	**% Bank Loans**	**% Aggregate**	**% Farms**	**% Bank Loans**	**% Aggregate**
2022-2023 OH non-MSA	22	1,072	100.00	2,232	0.49	0.00	0.31	4.95	0.00	3.54	61.38	77.27	65.01	33.18	22.73	31.14	--	--	--
Total	**22**	**1,072**	**100.00**	**2,232**	**0.49**	**0.00**	**0.31**	**4.95**	**0.00**	**3.54**	**61.38**	**77.27**	**65.01**	**33.18**	**22.73**	**31.14**	**--**	**--**	**--**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 12: Assessment Area Distribution of Loans to Farms by Gross Annual Revenue											2022 - 2023
Assessment Area:	**Total Loans to Farms**				**Farms with Revenues <= 1MM**			**Farms with Revenues > 1MM**		**Farms with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Farms**	**% Bank Loans**	**% Aggregate**	**% Farms**	**% Bank Loans**	**% Farms**	**% Bank Loans**
2022-2023 OH non-MSA	22	1,072	100.00	2,232	90.88	81.82	55.06	7.95	9.09	1.17	9.09
Total	**22**	**1,072**	**100.00**	**2,232**	**90.88**	**81.82**	**55.06**	**7.95**	**9.09**	**1.17**	**9.09**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

State of South Carolina

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2024
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**
Greenville MSA	355	132,722	100.00	34,148	2.38	2.54	2.38	15.48	17.75	14.50	35.79	23.38	36.73	46.13	56.06	46.07	0.22	0.28	0.32
Total	**355**	**132,722**	**100.00**	**34,148**	**2.38**	**2.54**	**2.38**	**15.48**	**17.75**	**14.50**	**35.79**	**23.38**	**36.73**	**46.13**	**56.06**	**46.07**	**0.22**	**0.28**	**0.32**

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

Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2024
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**
2024 Charleston SC MSA	221	191,069	85.33	--	4.43	1.36	--	15.88	3.17	--	25.56	24.43	--	52.94	70.59	--	1.18	0.45	--
2024 Spartanburg MSA	38	13,488	14.67	--	2.32	0.00	--	9.69	7.89	--	50.33	34.21	--	37.17	57.89	--	0.49	0.00	--
Total	**259**	**204,556**	**100.00**	**--**	**3.47**	**1.16**	**--**	**13.07**	**3.86**	**--**	**36.82**	**25.87**	**--**	**45.77**	**68.73**	**--**	**0.87**	**0.39**	**--**

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

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2022 - 2024**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Greenville MSA	355	132,722	100.00	34,148	18.61	3.10	5.23	16.28	19.72	16.54	19.96	17.46	21.51	45.14	55.49	40.75	--	4.23	15.98
Total	**355**	**132,722**	**100.00**	**34,148**	**18.61**	**3.10**	**5.23**	**16.28**	**19.72**	**16.54**	**19.96**	**17.46**	**21.51**	**45.14**	**55.49**	**40.75**	**--**	**4.23**	**15.98**

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

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2024**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
2024 Charleston SC MSA	221	191,069	85.33	--	21.20	0.45	--	15.40	5.88	--	18.09	11.31	--	45.30	80.54	--	--	1.81	--
2024 Spartanburg MSA	38	13,488	14.67	--	19.46	0.00	--	17.80	13.16	--	20.72	15.79	--	42.01	68.42	--	--	2.63	--
Total	**259**	**204,556**	**100.00**	**--**	**20.40**	**0.39**	**--**	**16.51**	**6.95**	**--**	**19.31**	**11.97**	**--**	**43.78**	**78.76**	**--**	**--**	**1.93**	**--**

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

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022 - 2024**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Greenville MSA	48	9,913	100.00	29,814	3.18	2.08	2.89	17.63	16.67	16.12	30.18	31.25	31.97	47.88	50.00	47.83	1.13	0.00	1.19
Total	**48**	**9,913**	**100.00**	**29,814**	**3.18**	**2.08**	**2.89**	**17.63**	**16.67**	**16.12**	**30.18**	**31.25**	**31.97**	**47.88**	**50.00**	**47.83**	**1.13**	**0.00**	**1.19**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2024**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
2024 Charleston SC MSA	18	4,029	66.67	--	8.61	0.00	--	16.70	44.44	--	22.75	27.78	--	50.08	27.78	--	1.86	0.00	--
2024 Spartanburg MSA	9	1,738	33.33	--	2.98	0.00	--	14.14	33.33	--	42.85	44.44	--	38.90	22.22	--	1.14	0.00	--
Total	**27**	**5,767**	**100.00**	**--**	**6.95**	**0.00**	**--**	**15.95**	**40.74**	**--**	**28.66**	**33.33**	**--**	**46.79**	**25.93**	**--**	**1.65**	**0.00**	**--**

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2022 - 2024**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Greenville MSA	48	9,913	100.00	29,814	83.18	60.42	50.76	7.17	25.00	9.65	14.58
Total	**48**	**9,913**	**100.00**	**29,814**	**83.18**	**60.42**	**50.76**	**7.17**	**25.00**	**9.65**	**14.58**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2024**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
2024 Charleston SC MSA	18	4,029	66.67	--	84.89	55.56	--	6.28	44.44	8.83	0.00
2024 Spartanburg MSA	9	1,738	33.33	--	82.82	55.56	--	7.31	33.33	9.87	11.11
Total	**27**	**5,767**	**100.00**	**--**	**84.28**	**55.56**	**--**	**6.58**	**40.74**	**9.14**	**3.70**

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

State of Tennessee

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2024
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**
Knoxville MSA	201	48,140	100.00	32,580	3.70	1.00	4.45	10.88	13.43	11.81	40.65	32.34	38.91	44.74	52.74	44.67	0.03	0.50	0.14
Total	**201**	**48,140**	**100.00**	**32,580**	**3.70**	**1.00**	**4.45**	**10.88**	**13.43**	**11.81**	**40.65**	**32.34**	**38.91**	**44.74**	**52.74**	**44.67**	**0.03**	**0.50**	**0.14**

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

Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2023
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**
2022-2023 Nashville MSA	1,731	496,515	100.00	110,829	2.30	1.68	2.90	16.64	10.17	15.94	40.48	34.72	38.81	40.05	52.40	41.52	0.54	1.04	0.82
Total	**1,731**	**496,515**	**100.00**	**110,829**	**2.30**	**1.68**	**2.90**	**16.64**	**10.17**	**15.94**	**40.48**	**34.72**	**38.81**	**40.05**	**52.40**	**41.52**	**0.54**	**1.04**	**0.82**

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

Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2024
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**
2024 Nashville MSA	791	272,701	100.00	--	2.43	5.44	--	17.25	25.03	--	42.20	29.33	--	37.48	39.70	--	0.63	0.51	--
Total	**791**	**272,701**	**100.00**	**--**	**2.43**	**5.44**	**--**	**17.25**	**25.03**	**--**	**42.20**	**29.33**	**--**	**37.48**	**39.70**	**--**	**0.63**	**0.51**	**--**

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

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2024
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Borrowers**			**Moderate-Income Borrowers**			**Middle-Income Borrowers**			**Upper-Income Borrowers**			**Not Available-Income Borrowers**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**
Knoxville MSA	201	48,140	100.00	32,580	18.76	4.98	6.82	15.93	16.42	17.41	19.81	22.39	21.35	45.51	55.22	39.70	--	1.00	14.72
Total	**201**	**48,140**	**100.00**	**32,580**	**18.76**	**4.98**	**6.82**	**15.93**	**16.42**	**17.41**	**19.81**	**22.39**	**21.35**	**45.51**	**55.22**	**39.70**	**--**	**1.00**	**14.72**

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

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2023
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Borrowers**			**Moderate-Income Borrowers**			**Middle-Income Borrowers**			**Upper-Income Borrowers**			**Not Available-Income Borrowers**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**
2022-2023 Nashville MSA	1,731	496,515	100.00	110,829	19.91	6.82	5.68	17.06	18.26	16.67	20.84	21.95	19.72	42.19	49.86	41.94	--	3.12	15.98
Total	**1,731**	**496,515**	**100.00**	**110,829**	**19.91**	**6.82**	**5.68**	**17.06**	**18.26**	**16.67**	**20.84**	**21.95**	**19.72**	**42.19**	**49.86**	**41.94**	**--**	**3.12**	**15.98**

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

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
2024 Nashville MSA	791	272,701	100.00	--	19.73	5.18	--	17.04	22.88	--	20.78	21.24	--	42.45	48.67	--	--	2.02	--
Total	**791**	**272,701**	**100.00**	--	**19.73**	**5.18**	--	**17.04**	**22.88**	--	**20.78**	**21.24**	--	**42.45**	**48.67**	--	--	**2.02**	--

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

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2024
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Knoxville MSA	42	6,434	100.00	21,549	5.77	7.14	4.46	9.48	16.67	10.78	31.08	28.57	31.24	52.41	47.62	53.07	1.26	0.00	0.45
Total	**42**	**6,434**	**100.00**	**21,549**	**5.77**	**7.14**	**4.46**	**9.48**	**16.67**	**10.78**	**31.08**	**28.57**	**31.24**	**52.41**	**47.62**	**53.07**	**1.26**	**0.00**	**0.45**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2023
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
2022-2023 Nashville MSA	268	44,441	100.00	88,846	4.02	2.61	3.52	20.43	17.54	19.73	29.12	26.49	30.24	43.53	48.88	43.97	2.90	4.48	2.54
Total	**268**	**44,441**	**100.00**	**88,846**	**4.02**	**2.61**	**3.52**	**20.43**	**17.54**	**19.73**	**29.12**	**26.49**	**30.24**	**43.53**	**48.88**	**43.97**	**2.90**	**4.48**	**2.54**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2024
Assessment Area:	**Total Loans to Small Businesses**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**
2024 Nashville MSA	161	25,762	100.00	--	4.24	5.59	--	20.38	34.16	--	31.73	21.12	--	40.68	37.27	--	2.97	1.86	--
Total	**161**	**25,762**	**100.00**	**--**	**4.24**	**5.59**	**--**	**20.38**	**34.16**	**--**	**31.73**	**21.12**	**--**	**40.68**	**37.27**	**--**	**2.97**	**1.86**	**--**

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
Knoxville MSA	42	6,434	100.00	21,549	78.06	45.24	48.51	10.20	42.86	11.74	11.90
Total	**42**	**6,434**	**100.00**	**21,549**	**78.06**	**45.24**	**48.51**	**10.20**	**42.86**	**11.74**	**11.90**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
2022-2023 Nashville MSA	268	44,441	100.00	88,846	82.33	68.28	51.71	8.86	27.24	8.81	4.48
Total	**268**	**44,441**	**100.00**	**88,846**	**82.33**	**68.28**	**51.71**	**8.86**	**27.24**	**8.81**	**4.48**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
2024 Nashville MSA	161	25,762	100.00	--	81.29	69.57	--	8.78	26.09	9.93	4.35
Total	**161**	**25,762**	**100.00**	**--**	**81.29**	**69.57**	**--**	**8.78**	**26.09**	**9.93**	**4.35**

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

State of West Virginia

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Charleston WV MSA	165	22,689	100.00	6,290	0.34	1.21	0.29	10.61	5.45	8.65	58.97	55.15	55.64	27.55	38.18	33.53	2.52	0.00	1.88
Total	**165**	**22,689**	**100.00**	**6,290**	**0.34**	**1.21**	**0.29**	**10.61**	**5.45**	**8.65**	**58.97**	**55.15**	**55.64**	**27.55**	**38.18**	**33.53**	**2.52**	**0.00**	**1.88**

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

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Charleston WV MSA	165	22,689	100.00	6,290	22.56	9.09	7.73	16.01	18.18	21.70	19.63	16.97	23.31	41.79	49.09	33.70	--	6.67	13.56
Total	**165**	**22,689**	**100.00**	**6,290**	**22.56**	**9.09**	**7.73**	**16.01**	**18.18**	**21.70**	**19.63**	**16.97**	**23.31**	**41.79**	**49.09**	**33.70**	**--**	**6.67**	**13.56**

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

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2024
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Charleston WV MSA	44	11,699	100.00	5,289	0.85	0.00	1.08	10.83	6.82	13.67	48.21	45.45	47.23	38.73	47.73	36.26	1.39	0.00	1.76
Total	**44**	**11,699**	**100.00**	**5,289**	**0.85**	**0.00**	**1.08**	**10.83**	**6.82**	**13.67**	**48.21**	**45.45**	**47.23**	**38.73**	**47.73**	**36.26**	**1.39**	**0.00**	**1.76**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues					2022 - 2024						
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
Charleston WV MSA	44	11,699	100.00	5,289	72.41	50.00	52.39	11.46	43.18	16.13	6.82
Total	**44**	**11,699**	**100.00**	**5,289**	**72.41**	**50.00**	**52.39**	**11.46**	**43.18**	**16.13**	**6.82**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%