Office of the
Comptroller of the Currency
Washington, DC 20219

SMALL BANK

PUBLIC DISCLOSURE

January 12, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First Central National Bank of St. Paris
Charter Number: 2488

103 South Springfield Street
St. Paris, OH 43072

Office of the Comptroller of the Currency

Central Ohio – Indiana Office
655 Metro Place South, Suite 625
Dublin, OH 43017

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

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Overall CRA Rating

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

The Lending Test is rated: **Satisfactory.**

The major factors that support this rating include:

- The Lending Test rating is based on the state of Ohio rating and the following overall conclusions:
  - The bank's loan-to-deposit (LTD) ratio is reasonable.
  - A substantial majority of the bank's loans are inside the assessment area (AA).
  - The bank exhibits an excellent distribution of loans to businesses and farms of different sizes and borrowers of different income levels.
  - The bank has not received any complaints about its Community Reinvestment Act (CRA) performance in helping to meet the AAs' credit needs during the evaluation period.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is reasonable.

First Central National Bank of St. Paris' (FCNB or the bank) quarterly average LTD ratio over the 14 quarters (September 30, 2021 – December 31, 2024) was 60.4 percent. The ratio ranged from a high of 76.2 percent on March 31, 2022, to a low of 47.9 percent on December 31, 2024. The bank's quarterly average LTD ratio was below the quarterly average LTD ratio of 78.1 percent for similarly situated financial institutions headquartered in Champaign, Logan, Shelby, and Miami counties. The quarterly average LTD for the customer peer group ranged from 76 to 82.5 percent. The custom peer group consisted of four financial institutions (excluding FCNB) with total assets ranging from $82.4 million to $490.3 million on December 31, 2024. Three of the similarly situated institutions had total assets higher than FCNB's total assets of $93.2 million for the same date.

LTD is reasonable as there was strong competition in the AA during the evaluation period given the number of financial institutions and offices operating in Champaign, Logan, Shelby, and Miami counties, per the December 31, 2024, Federal Deposit Insurance Corporation's (FDIC) Deposit Market Share Report. Credit unions in the AA also created lending competition.

Lending in Assessment Area

A substantial majority of the bank's loans were inside its AA.

The bank originated and purchased 81.7 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.

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		
	#	%	#	%		$	%	$	%	
Small Business	19	95.0	1	5.0	20	4,721	99.0	48	1.0	4,769
Small Farm	12	60.0	8	40.0	20	2,625	64.7	1,430	35.3	4,055
Consumer	18	90.0	2	10.0	20	230	70.3	97	29.7	327
Total	**49**	**81.7**	**11**	**18.3**	**60**	**7,576**	**82.8**	**1,575**	**17.2**	**9,151**
Source: 1/1/2022 - 12/31/2024 Bank Data.										
Due to rounding, totals may not equal 100.0%										

Description of Institution

FCNB is a wholly owned subsidiary of Central Bancshares, Inc., a one-bank holding company. Both FCNB and the holding company are headquartered in St. Paris, Ohio (OH). As of December 31, 2024, total assets were $93.2 million with $55.7 million in net loans and leases, $73.1 million in total deposits, and $18.8 million in tier 1 capital. There was no merger or acquisition activity that affected the scope of the bank's operations during the evaluation period.

FCNB operates the main office in St. Paris and three branches in Christiansburg, Rosewood, and Urbana, OH. All four bank locations reside in Champaign County. The St. Paris, Urbana, and Christiansburg branches have a drive-up facility, but the Rosewood office does not. The bank has a 24-hour automated teller machine (ATM) at its main office location and Urbana branch. In October 2024, the bank installed an ATM at the Christiansburg branch and removed an off-premise ATM located at a restaurant in Christiansburg. The Rosewood branch does not have an ATM. The St. Paris, Christiansburg, and Rosewood locations are in upper-income census tracts (CTs). The Urbana branch is in a middle-income CT. There are no substantial differences in the business focus or services offered between the bank's branches, other than there are no onsite loan officers in the Christiansburg and Rosewood branches. Management originates all loans out of the main office or the Urbana branch. Since the previous CRA evaluation in 2021, one new branch opened in Urbana, OH on June 27, 2022.

FCNB is a single state financial institution with one AA in Ohio, which is the bank's only rating area. The Non- Metropolitan Statistical Area (MSA) AA is as follows:

- Champaign County, OH – entire county (10 CTs)
- Logan County, OH – CTs 40, 41, 42, 43, 44, and 48
- Shelby County, OH – CT 9722
- Miami County, OH – CT 3001, 3150.01, 3150.02, 3151, 3153, 3651.01, 3651.02, and 3901 (These CTs are located in the Dayton, OH MSA. However, the bank does not have a branch in the Dayton MSA, and the CTs do not extend substantially beyond the Non-MSA AA boundary. Similar to the last exam, we included these CTs in the Non-MSA AA since they did not extend substantially beyond the Non-MSA AA.)

The AA is described in the "Scope of the Evaluation" and "Description of Institution's Operations in Ohio" sections in this performance evaluation.

As of December 31, 2024, Consolidated Reports of Condition and Income (Call Report) and Uniform Bank Performance Reports (UBPR), FCNB's total loans were approximately $56 million representing 60 percent of total assets. The bank offers a variety of traditional lending and deposit products and services through its four locations to accommodate its customers. The bank's loan portfolio as of the December 31, 2024, Call Report, was comprised of approximately 44.6 percent in loans secured by farmland or to finance agricultural production (farm loans), 30.7 percent in residential real estate (home mortgages), 19.7 percent in commercial and commercial real estate (business loans), and 2.7 percent in consumer loans. The bank also offers online banking. FCNB's primary business focus is farm loans, business loans, and consumer loans.

There are no financial, legal, or other factors that impede FCNB's ability to meet the credit needs of its AA. The bank's previous CRA evaluation was as of November 8, 2021, and resulted in a Satisfactory rating.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The Office of the Comptroller of the Currency (OCC) conducted a CRA performance evaluation to assess the bank's record of meeting the credit needs of its entire community, including low- or moderate- income (LMI) areas. The OCC used small bank CRA evaluation procedures to assess the bank's performance under the Lending Test. The OCC analyzed lending activity in full-year increments during the evaluation period, January 1, 2022, to December 31, 2024.

The OCC evaluated the bank's lending performance based on its primary lending products, small farm, small business, and consumer lending. The bank provided loan origination data for 2022, 2023, and 2024. Based on discussions with management and the data supplied by the bank for the number of loans originated during the evaluation period, farm loans accounted for 32.9 percent, business loans accounted for 25.2 percent, consumer lending accounted for 25.2 percent, and home mortgages accounted for 16.6 percent. By dollar volume of originations from 2022-2024, farm loans accounted for 34.3 percent, business loans accounted for 17.8 percent, and consumer lending accounted for 5.8 percent. While the bank offers other lending products, these products were not a primary product during the evaluation period and were not considered in the evaluation, as analysis of this data would not be meaningful. FCNB's primary lending products are discussed under the "Description of Institution" section of this performance evaluation.

For the Lending Test, the OCC transaction tested 20 small business loans, 20 farm loans, and 20 consumer loans originated during the evaluation period. The OCC relied on internal bank reports for the transaction testing of small farm and small business loans originated or purchased during the evaluation period. No affiliate activity was included in this analysis. For analysis purpose, the OCC compared the bank's lending performance with demographic data from the 2024 American Community Survey (ACS) U.S. Census data and Dun and Bradstreet (D&B) data as of December 2024. Refer to the table in appendix A, Scope of the Examination, for more information on the scope of the review.

Selection of Areas for Full-Scope Review

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

FCNB has one AA, the OH Non-MSA described above under the "Description of Institution" section. The OCC completed a full-scope review for the AA. A description of the AA is provided in the "Description of Institution's Operations in Ohio" section of this PE.

Ratings

The bank's overall rating is based on the state of Ohio rating. During the evaluation period, FCNB operated all branch offices in a single state. Therefore, its overall rating is based on performance solely in the state of Ohio. The state of Ohio rating is based on performance in the Non-MSA AA and all three primary products were weighted equally.

Discriminatory or Other Illegal Credit Practices Review

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

State Rating

State of Ohio

CRA rating for the State of Ohio: Satisfactory.

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

- The bank exhibits an excellent distribution of loans to businesses and farms of different sizes and individuals of different income levels.
- The bank exhibits a poor geographic distribution of loans for loans to smaller businesses and farms and individuals of different geographies.
- FCNB has not received any complaints about its CRA performance in helping to meet the AA's credit needs during the evaluation period.

Description of Institution's Operations in Ohio

FCNB has one AA located in a Non-MSA in Ohio. As stated above, the OH Non-MSA AA includes Champaign County in its entirety, six CTs in the western section of Logan County, one CT in the southeastern part of Shelby County, and eight CTs in the northeastern section of Miami County. All four branches are located in Champaign County. Most CTs outside Champaign County include areas in other counties located near the bank's branches. Based on the 2024 FFIEC File – 2024 Census, the AA comprises 25 CTs, where three are moderate-income, 17 are middle-income, and five are upper-income CTs.

Most of the businesses in the AA are small as measured by the number of employees and gross annual revenues. According to 2024 D&B data, 82.7 percent of the businesses located in the AA have gross annual revenues of $1 million or less. Most of the farms in the AA are small as measured by gross annual revenues. According to 2024 D&B data, 98.2 percent of the farms located in the AA have gross annual revenues of $1 million or less. Approximately 12.6 percent of the farms are in moderate-income CTs, with the remaining in middle-income and upper-income CTs.

Non-MSA AA

The following information regarding demographic data, affordable housing cost, job market and economic conditions, competition, and community contacts/credit needs provides additional performance context for the bank's operations in the OH Non-MSA. The tables below provide a summary of demographic data for the AA.

Assessment Area(s) – OH Non-MSA AA 2024						
						2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	25	0.00	12.00	68.00	20.00	0.00
Population by Geography	104,493	0.00	11.74	62.77	25.49	0.00
Housing Units by Geography	48,154	0.00	13.62	62.99	23.40	0.00
Owner-Occupied Housing by Geography	29,635	0.00	9.87	62.08	28.05	0.00
Occupied Rental Units by Geography	11,766	0.00	19.50	64.01	16.49	0.00
Vacant Units by Geography	6,753	0.00	19.83	65.19	14.99	0.00
Businesses by Geography	2,845	0.00	11.53	64.50	23.97	0.00
Farms by Geography	389	0.00	2.83	56.56	40.62	0.00
Family Distribution by Income Level	27,026	17.86	17.12	24.05	40.97	0.00
Household Distribution by Income Level	41,401	21.24	16.48	19.65	42.63	0.00
Unemployment rate (%)	4.55	0.00	4.62	4.80	3.92	0.00
Households Below Poverty Level (%)	11.43	0.00	19.70	10.78	8.87	0.00
Median Family Income (Non-MSAs – OH)		$66,160			Median Housing Value	$135,900
Median Family Income (Non-MSAs – OH) for 2024		$81,600			Median Gross Rent	$775
					Families Below Poverty Level	8.08

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

Demographic Data

As of the 2024 U.S. Census data in the table above, the population in the OH Non-MSA was 104,493 with 11.7 percent living in moderate-income CTs. The AA consisted of 25 CTs, and was comprised of no low-income CTs, three moderate-income CTs, 17 middle-income CTs, and five upper-income CTs. The AA included 27,026 families and 41,401 households.

Affordable Housing

Examiners considered the poverty level across the AA in the evaluation of lending performance. Families and households living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial capacity to qualify for a home mortgage loan than those with income above the poverty level. For the OH Non-MSA, the percentage of families below poverty level was 8.1 percent as noted in the 2024 table above. The percentage of households below poverty was 11.4 percent.

Job Market and Economic Conditions

Economic conditions in the OH Non-MSA fluctuated and followed a similar trend as the state and national levels. According to the U.S. Bureau of Labor Statistics, the average annual unemployment rates for Champaign, Logan, Shelby, and Miami counties slightly declined from 2022 to 2023 but increased in 2024. The average annual unemployment rate in all four counties was slightly below the state of Ohio for 2024. Logan, Shelby, and Miami counties were below the national unemployment rate for 2024, but Champaign County was above the national unemployment rate.

Average Annual Unemployment Rates			
	2022	2023	2024
State of Ohio	4.0	3.7	4.3
United States	3.7	3.6	4.1
Champaign County	3.9	3.5	4.2
Logan County	3.5	3.2	4.0
Shelby County	3.4	3.1	3.9
Miami County	3.6	3.4	3.9
Source: U.S. Bureau of Labor Statistics; Rates Not Seasonally Adjusted			

The AA had a diverse mix of companies across many industries with a significant presence of manufacturing, energy, and industrial technology. Major employers in Champaign County include KTH Parts Industries, Inc., Rittal Corporation, Honeywell International, Inc., and Johnson Welded Products, Inc. Major employers in Logan County include Honda Motor Co Ltd, Midwest Express, AGC Glass Co., Mary Rutan Hospital, and the local school systems. Major employers in Shelby County include Honda Motor Co Ltd, Continental Express, Airstream, and local government and school districts. Major employers in Miami County include Upper Valley Medical Center, Clopay Building Products, F&P America, Meijer Inc, and Collins Aerospace.

Competition

Competition in the AA is strong due to the presence of many regional and community banks, as well as credit unions. As of December 31, 2024, FDIC's Deposit Market Share Report, there were 29 financial institutions operating 82 banking offices in these Champaign, Logan, Miami, and Shelby counties, including FCNB. Competitors with significant deposit market share on December 31, 2024, include U.S. Bank National Association (N.A.), Fifth Third Bank, N.A., JPMorgan Chase Bank, N.A., and Park National Bank. These four banks account for approximately 45.2 percent of total deposit market share in Champaign, Logan, Miami, and Shelby counties as of December 31, 2024. The December 31, 2024, FDIC deposit market share data shows FCNB's $73.6 million in total deposits in the AA ranks seventeenth in overall deposit market share at 1.4 percent.

Community Contacts/Credit Needs

As part of the CRA performance evaluation, the OCC reviewed information provided from two interviews with representatives from a local community foundation and a local business liaison. The community foundation contact identified lack of public transportation, childcare, and a shortage in workforce as three areas for improvement. The local business liaison identified affordable housing as a primary credit need and referenced a first time home buyer program as a potential solution but noted low home inventory. In general, local financial institutions are adequately meeting the credit and community development needs of the community.

Scope of Evaluation in Ohio

The OCC performed a full-scope review of the OH Non-MSA AA. The data in this AA was analyzed and presented as one AA for this performance evaluation. Small farm, small business, and consumer loans are the bank's primary lending products, and were evaluated under the Lending Test, and given

equal weight when determining the state rating. Refer to the "Scope of the Evaluation" section for more details.

LENDING TEST

The bank's performance under the Lending Test in Ohio is rated **Satisfactory**.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the OH Non-MSA AA was reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibited poor geographic distribution of loans in the State.

OH Non-MSA

Within the loan sample, FCNB did not originate any small loans to businesses, farms, or consumers in moderate-income CTs reflecting overall poor distribution. There are three moderate-income CTs in the AA, one in Miami County, and two in northern Logan County. However, the two moderate-income CTs, in Logan County, are not near the bank's branch locations. The one moderate-income CT in Miami County has strong competition. There are no low-income CTs in the bank's AA. All the bank's branches are in high-income CTs, with the exception of the Urbana branch located in a middle-income CT.

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 OCC compared the percentage of the number of small loans to businesses originated by the bank in the four geographic income categories (low-, moderate-, middle-, and upper-income) to the distribution of businesses throughout those geographies (demographic data), placing emphasis on the LMI geographies. The OCC also compared the bank's performance against the percentage of small loans to businesses of other lenders (aggregate data), as demonstrated by CRA aggregate data.

The geographic distribution of small loans to businesses was poor. There were no low-income geographies in the AA during the evaluation period. The percentage of loans to small businesses in moderate-income geographies were significantly below both the percentage of businesses and the aggregate percentage of all reporting lenders. Within the 20 loan sample, FCNB did not originate any small loans to businesses located in the moderate-income CTs in the AA. However, there are only three moderate-income CTs in the AA, one of which has strong competition, and the other two are not near the bank's branches.

Small Loans to Farms

Refer to Table 11 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 farms.

The OCC compared the percentage of the number of small loans to farms originated by the bank in the four geographic income categories (low-, moderate-, middle-, and upper-income) to the distribution of farms throughout those geographies (demographic data), placing emphasis on the LMI geographies. The OCC also compared the bank's performance against the percentage of small loans to farms of other lenders (aggregate data), as demonstrated by CRA aggregate data.

The geographic distribution of small loans to farms was reasonable. Within the 20 loan sample, FCNB did not originate any small loans to farms located in the moderate-income CTs in the AA. However, the distribution is reasonable given that the aggregate (0.7 percent) and percentage of farms (2.8 percent) in the AA were low overall. Aggregate data shows there were 481 farm loans originated in the AA during the evaluation period, and approximately three (0.7 percent) were originated in the moderate-income CTs. Farm lending opportunities are limited in the moderate-income CTs. Of the three moderate-income CTs in the AA, one is in a city area where farming is not as prevalent and the other two are not near any of the bank's branches.

Consumer Loans

Refer to Table 13 in the state of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The OCC compared the percentage of the number of consumer loans originated by the bank in the four geographic income categories (low-, moderate-, middle-, and upper-income) to the distribution of farms throughout those geographies (demographic data), placing emphasis on the LMI geographies. The OCC also compared the bank's performance against the percentage of consumer loans of other lenders (aggregate data), as demonstrated by CRA aggregate data.

The geographic distribution of consumer loans was poor. Within the 20 loan sample, FCNB did not originate any consumer loans to borrowers located in the moderate-income CTs in the AA. Additionally, there are only three moderate-income CTs in the AA, one of which has strong competition, and the other two are not near the bank's branches.

Lending Gap Analysis

The OCC reviewed summary reports, maps, and analyzed the bank's agriculture (small loans to farms), business (small loans to businesses), and consumer lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. The OCC did not identify any unexplained conspicuous gaps in the bank's AA, given performance context considerations.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans to businesses and farms of different sizes and individuals of different income levels, given the product lines offered by the bank.

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 originations and purchases of small loans to businesses.

The OCC compared the percentage distribution of the number of small loans to businesses originated by the bank by gross annual revenue level to businesses with gross annual revenues of $1 million or less (demographic data). The OCC also compared the bank's performance to aggregate small business data, as demonstrated by CRA aggregate data.

The distribution of small loans to businesses of different sizes was excellent. The percentage of small loans to businesses was near the percentage of businesses and significantly exceeded the aggregate percentage of all lenders.

Small Loans to Farms

Refer to Table 12 in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

The OCC compared the percentage distribution of the number of small loans to farms originated by the bank by gross annual revenue level to farms with gross annual revenues of $1 million or less (demographic data). The OCC also compared the bank's performance to aggregate small farm data, as demonstrated by CRA aggregate data.

The distribution of loans to small farms of different sizes was reasonable. The percentage of small farm loans was below the percentage of farms but significantly exceeded the aggregate percentage of all lenders. The aggregate lending distribution data was well below the percentage of small farms in the AA.

Consumer Loans

Refer to Table 14 in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans among individuals of different income levels was excellent. The percentage of consumer loans exceeded both the percentage of households and aggregate percentage of all lenders for both low- and moderate-income borrowers.

Responses to Complaints

FCNB has not received any complaints about its CRA performance in helping to meet the AA's credit needs during the evaluation period.

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:	Small business, small farm, and consumer loans	
Affiliate(s)	**Affiliate Relationship**	**Products Reviewed**
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	**Type of Exam**	**Other Information**
State of Ohio		
OH Non-MSA AA	Full-Scope	The OH Non-MSA AA includes Champaign County in its entirety, CTs 40, 41, 42, 43, 44, and 48 in Logan County, CT 9722 in Shelby County, and CTs 3001, 3150.01, 3150.02, 3151, 3153, 3651.01, 3651.02, and 3901 in Miami County.

Appendix B: Summary of State Ratings

RATINGS	
Overall Bank:	Lending Test Rating:
The First Central National Bank of St. Paris	Satisfactory
State:	
Ohio	Satisfactory

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/AA.

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

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

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the 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, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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 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/AA.

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

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a Core Based Statistical Area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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

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

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

Multistate Metropolitan Statistical Area (MMSA): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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

Prior Period Investments: Investments made in a previous evaluation period that are outstanding as of the end of the evaluation period.

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

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

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of $1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have

original amounts of $500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Unfunded Commitments: Legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the "bank" include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated 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 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. The table also presents aggregate peer data for the years the data is available. 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.

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		
	#	$ (000s)	% 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
OH Non-MSA AA	20	4,752	100.0	4,253	0.0	0.0	0.0	11.53	0.0	10.32	64.50	35.0	65.74	24.0	65.0	23.9	0.0	0.0	0.0
Total	**20**	**4,752**	**100.0**	**4,253**	**0.0**	**0.0**	**0.0**	**11.53**	**0.0**	**10.32**	**64.50**	**35.0**	**65.74**	**24.0**	**65.0**	**23.9**	**0.0**	**0.0**	**0.0**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, 2024 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	
	#	$ (000s)	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
OH Non-MSA AA	20	4,752	100.0	4,253	82.7	80.0	57.8	4.25	20.0	13.1	0.0
Total	**20**	**4,752**	**100.0**	**4,253**	**82.7**	**80.0**	**57.8**	**4.25**	**20.0**	**13.1**	**0.0**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, 2024 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 – 2024

Assessment Area:	Total Loans to Farm				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate
OH Non-MSA AA	20	3,353	100.0	481	0.0	0.0	0.0	2.8	0.0	0.6	56.6	40.0	65.1	40.6	60.0	34.3	0.0	0.0	0.0
Total	**20**	**3,353**	**100.0**	**481**	**0.0**	**0.0**	**0.0**	**2.8**	**0.0**	**0.6**	**56.6**	**40.0**	**65.1**	**40.6**	**60.0**	**34.3**	**0.0**	**0.0**	**0.0**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, 2024 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 – 2024

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
OH Non-MSA AA	20	3,353	100.0	481	98.2	90.0	56.1	0.3	10.0	1.5	0.0
Total	**20**	**3,353**	**100.0**	**481**	**98.2**	**90.0**	**56.1**	**0.3**	**10.0**	**1.5**	**0.0**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, 2024 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 13: Assessment Area Distribution of Consumer Loans by Income Category of the Geography — 2022 - 2024

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
OH Non-MSA AA	20	292	100.0	0.0	0.0	12.6	0.0	62.6	35.0	24.8	65.0	0.0	0.0
Total	**20**	**292**	**100.0**	**0.0**	**0.0**	**12.6**	**0.0**	**62.6**	**35.0**	**24.8**	**65.0**	**0.0**	**0.0**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2024 Bank Data.
Due to rounding, totals may not equal 100.0%

Table 14: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower — 2022 - 2024

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	$	% of Total Number	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
OH Non-MSA AA	20	292	100.0	21.2	30.0	16.5	35.0	19.7	25.0	42.6	10.0	0.0	0.0
Total	**20**	**292**	**100.0**	**21.2**	**30.0**	**16.5**	**35.0**	**19.7**	**25.0**	**42.6**	**10.0**	**0.0**	**0.0**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, "--" data not available.
Due to rounding, totals may not equal 100.0%