



PUBLIC DISCLOSURE

November 7, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Old National Bank
Charter Number: 8846

1 Main St
Evansville, Indiana 47708

Office of the Comptroller of the Currency

425 South Financial Place, Suite 1700
Chicago, Illinois 60605

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 following table indicates the performance level of Old National Bank with respect to the Lending, Investment, and Service Tests:

Performance Levels	Old National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	
High Satisfactory	X		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 primarily on the performance in the Evansville IN-KY multistate metropolitan statistical area (MMSA) and the state of Indiana and Minnesota rating areas. The bank made a high percentage of bank loans within its assessment areas (AA).
- The Investment Test rating is based on performance in the Evansville IN-KY MMSA and the state of Indiana and Minnesota rating areas. The bank has an excellent level of qualified community development (CD) investments and grants across the rating areas and at the state level.
- The Service Test rating is based on performance in the Evansville IN-KY MMSA and the state of Indiana and Minnesota rating areas. Performance in the Evansville IN-KY MMSA and the state of Minnesota rating areas is good, and performance is adequate in the state of Indiana. The bank opened 20 branches and closed 31 branches during the evaluation period across the bank’s footprint.

Lending in Assessment Area

A high percentage of the bank’s loans are in its AA.

The bank originated or purchased 81.6 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.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	27,788	78.2	7,736	21.8	35,524	6,257,146	70.5	2,622,409	29.5	8,879,555
Small Business	22,275	86.2	3,578	13.8	25,853	3,122,598	83.0	639,950	17.0	3,762,548
Small Farm	1,888	82.3	405	17.7	2,293	205,068	81.9	45,445	18.1	250,513
Total	51,951	81.6	11,719	18.4	63,670	9,584,812	74.3	3,307,804	25.7	12,892,616

Home mortgage and small business loans are considered primary products of the bank. These products have a greater direct impact and are more responsive to credit needs in the bank's AAs. Conclusions are factored into the overall analysis of the geographic distribution of lending by income level of geography.

Description of Institution

Old National Bank, N.A. (ONB or the bank) is an interstate, commercial bank headquartered in Evansville, IN and wholly owned by Old National Bancorp, a one bank holding company headquartered in Evansville, IN. The bank was chartered in 1834.

ONB has two subsidiaries, ONB Community Equity, LLC and Downtown Evansville Growth Fund, LLC, which are involved in CD. The subsidiaries hold equity investments in various entities, including low-income housing tax credit projects, federal housing tax credit projects, and Community Development Financial Institutions (CDFI). Tax credit equity support the construction of affordable housing, historic rehabilitation, and commercial real estate development projects. They provide affordable housing for LMI individuals and families and economic development of LMI geographies primarily within the bank's AAs.

Through ONB Community Equity, Old National specializes in innovative tax credit financing solutions for Historic Tax Credit, New Markets Tax Credit, Alternative Energy Tax Credit, and Low-Income Housing Tax Credit (LIHTC) transactions.

We also considered the activities of an affiliate, ONB Foundation (ONBF), in evaluating CD performance during the evaluation period. ONBF provides charitable grants to a variety of community service and economic development organizations benefiting LMI individuals and LMI geographies within the bank's AAs.

The bank currently operates 162 banking centers, branch offices, and 172 deposit-taking, automatic teller machines (ATMs) distributed across 24 AAs in six states: Illinois (IL), Indiana (IN), Kentucky (KY), Michigan (MI), Minnesota (MN), and Wisconsin (WI). ONB opened 20 branches and closed 31 branches during the evaluation period.

As of December 31, 2021, ONB had total assets of \$24.4 billion and tier 1 capital was nearly \$2 billion. Total net loans and leases outstanding were \$13.6 billion. The loan portfolio consisted of 28.9 percent non-farm non-residential loans, 22.1 percent one-to-four family residential loans, 19.4 percent commercial & industrial loans, 9.8 percent multifamily loans, 7.2 percent loans to individuals, and 12.6 percent in all other loans. Total deposits were \$18.7 billion.

ONB is a full-service financial institution that offers a comprehensive array of banking services, including depository, commercial and consumer loan services as well as private banking, brokerage, trust, investment advisory, and other traditional banking services. ONB has historically focused on community banking although currently ONB operates as a leading commercially-oriented regional bank serving customers through integrated commercial, community banking, and wealth management teams.

ONB competes with many commercial banks, savings and loan associations, credit unions, mortgage banking firms, consumer finance companies, securities brokerage firms, insurance companies, money market mutual funds, and other financial intermediaries for deposit market share. The bank offers a variety of deposit products to businesses and consumers. Deposit products include checking, savings, and money market deposit accounts, certificates of deposits, and individual retirement accounts. ONB offers additional retail services including mobile banking, mobile deposit, online banking, bill pay, e-statements, and debit cards. Consumer banking products include mortgage loans, home equity loans and lines of credit, auto loans, credit cards, investments, private banking, and wealth management.

Business banking products include term loans, lines of credit, Small Business Administration (SBA) loans, credit cards, treasury management, merchant services, and wealth management.

COVID-19 Pandemic

In March 2020, the World Health Organization declared COVID-19 a pandemic. In response to the pandemic, the United States was under a shelter-in-place order in an effort to limit the spread of the virus. Due to the shelter-in-place orders, certain businesses deemed non-essential were shut down or limited in operations. The pandemic limited the ability of bank personnel to provide in-person services. The evaluation of the bank's performance takes into consideration the impact of the pandemic.

During the evaluation period, the bank strategically targeted certain CD investments and services to assist in addressing economic hardships associated with the pandemic mitigation practices, advancing the bank's commitment towards alleviating economic disparities among LMI communities. To meet SBA initial guidance on the Paycheck Protection Program (PPP), the bank modified its technology systems to accommodate small businesses and nonprofit organizations. A PPP loan is SBA-backed and helped businesses keep their workforce employed during the pandemic.

Additionally, opportunities for virtual service deliveries were limited by the capacity of community organizations and the ability of LMI families and small businesses to access virtual technology.

This disproportionately affected blue-collar jobs, in which LMI individuals are primarily employed. To assist their borrowers experiencing financial difficulty due to the pandemic, the bank offered various services and relief options. The following were relief and services offered by the bank:

- Consumer and mortgage loan payment extensions.
- Waived monthly service charges and overdraft fees.
- Loan deferrals and modifications.
- Waived early redemption fees on CDs.
- Utilized video conference technology to conduct financial education sessions.

There were no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AA during the evaluation period. There were no acquisitions or mergers during the evaluation period that would have affected the bank's CRA performance or the OCC's analysis. ONB's CRA performance was rated "Satisfactory" in the last performance evaluation dated October 7, 2019.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assesses the bank's performance under the large bank Lending, Investment, and Service Tests. The evaluation period is January 1, 2019, through December 31, 2021.

For the Lending Test, the OCC analyzed home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA) and small loans made to businesses and farms reported under the CRA. Primary loan products, for purposes of this review, are products in which the bank originated at least 20 loans within an AA during one or more of the analysis periods within the overall evaluation period. Multifamily loans and small loans to farms are not primary loan products; therefore, the OCC did not evaluate these products separately. However, the OCC did consider multifamily loans meeting the CD definition as part of the evaluation of CD lending.

For the borrower distribution analysis consideration was given to the impact of home affordability for LMI borrowers in higher cost areas when comparing the distribution of home mortgage loans to the demographics. It is difficult for many LMI borrowers to afford a home, as the area's median housing value is typically too high for conventional mortgage loan qualification. As such, more emphasis was placed on the bank's lending results to LMI borrowers relative to the aggregate performance rather than the demographic data.

In performing the analysis of loans to small businesses, the OCC considered the environment for small business lending, which is very competitive. Large interstate banks, regional banks, and community banks compete for this business in the AA. The large number of competing banks and dominance from the top five lenders somewhat affects the bank's ability to make small loans to businesses. A significant portion of the bank's small loans to businesses did not contain revenue information, as permitted under the CRA reporting requirements. Many of these loans were originated through the PPP without revenue data. More emphasis was placed on the bank's lending relative to aggregate performance.

Small loans to farms were not a primary loan product in the Louisville KY-IN MMSA, South Bend-Elkhart-Mishawaka IN-MI combined statistical area (CSA), or the states of Illinois and Wisconsin. The bank did not originate or purchase enough small loans to farms during the evaluation period; therefore, they were not analyzed.

The OCC compared bank loan data for all applicable years in the state rating area to: demographic data using the U.S. Census American Community Survey (ACS); Federal Financial Institutions Examination Council (FFIEC) adjusted median family incomes; 2020 Dun and Bradstreet (D&B) small business demographic data; 2021 peer mortgage loan data reported under HMDA; and 2021 peer small business data reported under CRA.

In evaluating the geographic distribution and borrower income criteria under the Lending Test, the 2019 through 2021 data was analyzed and aggregated. Refer to performance tables O, P, Q, R, S, T, U, and V in Appendix D.

The Investment Test includes an analysis of investments, the high competition in the AA, with large interstate, regional, and community banks competing for qualified investments in the market.

Bank and branch deposit data is as of June 30, 2022, based on information from the Federal Deposit Insurance Corporation (FDIC). The distribution of bank branches is compared to U.S. Census 2015 ACS population estimates.

The Service Test includes an evaluation of the availability and effectiveness of a bank's systems for delivering retail banking services, including the current distribution of branches among different income geographies.

The OCC also evaluated retail services, qualified investments, and CD services from January 1, 2019, through December 31, 2021. Qualifying activities performed in response to the significant impact of the pandemic across the United States are addressed in this evaluation.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AA(s) 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), MMSA, or CSA 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 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.

Ratings

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

The Evansville IN-KY MMSA and the states of Indiana and Minnesota rating areas carried the greatest weight in our conclusions because these areas represented the bank's most significant markets in terms of deposit concentration, branch distribution, and reportable loans. As of June 30, 2022, deposits in these rating areas comprised 73.6 percent of ONB's total deposits, 68.8 percent of bank branches, and 69.3 percent of reportable loan originations.

The MMSA and state ratings are based on performance in all bank AAs. Refer to the Scope section under each State and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Other Loan Performance

ONB makes extensive use of flexible home mortgage lending products. Throughout the evaluation period the bank made 2,811 flexible mortgage loans totaling \$574.4 million. ONB offers government-guaranteed loan products including Federal Housing Administration (FHA), United States Department of Agriculture (USDA) Rural Housing, Veterans Administration (VA), and SBA loans. These loans are included in the totals for home mortgage loans and small loans to businesses.

Additional lending programs were considered and had a positive impact on the bank's overall lending performance. ONB used a proprietary affordable home mortgage loan product to meet the affordable housing needs of LMI individuals or families.

The bank also participates in some flexible mortgage lending programs benefitting underserved markets and/or LMI individuals or families in various states. ONB employs mortgage staff dedicated to working with low-income and first-time homebuyers.

ONB works in conjunction with state housing agencies and city or county programs to offer affordable FHA and VA products to first time and other qualified homebuyers. These programs may include closing cost and down payment assistance (DPA). ONB has worked with the Indiana Housing and Community Development Authority (IHCDA), Kentucky Housing Corporation (KHC), Michigan State Housing Development Authority (MSHDA), and Wisconsin Housing and Economic Development Authority (WHEDA) to offer flexible, affordable loan products under each of the agency's respective programs.

Refer to the Product Innovation and Flexibility section in the Lending Test section of each MMSA or state for additional information, as applicable. The following is a description of the flexible mortgage loan products the bank offers throughout the various rating areas.

Paycheck Protection Program

The bank made use of responsive flexible lending during the pandemic in 2020 by originating loans to stabilize small businesses and communities through the SBA PPP. During the evaluation period, the bank originated 15,711 PPP loans totaling \$2.1 billion in the bank's rating areas and 269 PPP loans totaling \$43.2 million outside the bank's footprint. This activity received positive consideration, as it provided stabilization of small businesses and communities.

Home Manager Mortgage

The flexible loan underwriting criteria for this proprietary home mortgage loan product includes up to 97 percent financing with no private mortgage insurance (PMI) requirements. This product offers borrowers the ability to use down payment funds from personal savings, from a gift from a family member, or in the form of a grant from a qualified agency. Home Manager Mortgages (HMM) are restricted to LMI borrowers who complete the Housing and Urban Development (HUD) Certified Home Buyer Education Program and do not qualify for an FHA loan. Successful completion of a first-time home buyer counseling program may qualify borrowers for DPA. Over the course of the evaluation period, ONB originated 119 HMM loans totaling \$15.4 million within the bank's AA. The following is a breakdown of the HMM loans by rating area:

- 33 loans totaling \$5.3 million in the state of Wisconsin
- 31 loans totaling \$3.6 million in the state of Michigan
- 20 loans totaling \$2.1 million in the Evansville IN-KY MMSA
- 17 loans totaling \$1.6 million in the state of Indiana
- 14 loans totaling \$2.2 million in the state of Minnesota
- 2 loans totaling \$215,650 thousand in the Louisville KY-IN MMSA
- 1 loan totaling \$160,050 in the state of Kentucky
- 1 loan totaling \$65,960 in the South Bend-Elkhart-Mishawaka CSA

Amish and Old Order Mennonite Residential Mortgage

This proprietary home mortgage loan product targets underserved Amish and Old Order Mennonite borrower population who seek financing for the purchase or construction of a primary residence but do not qualify for traditional loan products offered by ONB. These borrowers typically have housing and income ratios that do not meet bank guidelines. In addition, the home (collateral) typically does not have electricity or electrical wiring, heating, air conditioning, a certified or licensed contractor, or agency underwritten hazard insurance protection. ONB exhibits flexibility by using a manual underwriting process that uses a modified cost of living allowance for debt service calculations that excludes or reduces the allowance for insurance, food, housing, and transportation expenses. Other examples of flexibility include, but are not limited to, no required credit score for applicants and, for those that do, there is no required minimum credit score. Over the course of the evaluation period, ONB originated 20 of these loans totaling \$2.6 million in the state of Indiana, one loan totaling \$230,000 in Illinois, and one loan totaling \$179,500 in Wisconsin.

USDA Rural Housing Loans

The purpose of the program is primarily to help LMI individuals or households purchase homes in rural areas. With USDA Rural Housing Loans, LMI borrowers qualify for a reduced down payment and financing up to the sales price. The transaction is structured to provide a fixed-rate first mortgage for a term of 30 years. This product has income restrictions. Over the course of the evaluation period, ONB originated 168 USDA loans totaling \$24.1 million within the bank's AAs.

Federal Housing Administration Mortgage Loans

FHA mortgage loans offer lower down payment requirements and have less restrictive qualifying criteria for borrowers. The borrowers must make a minimum down payment which can come from several funding sources, including the borrower's own funds, a bona fide gift, a loan from a family member, a governmental agency, a loan secured by the borrower's investment accounts, or real property or other assets owned by the borrower. Over the course of the evaluation period, ONB originated 351 FHA loans totaling \$58.5 million within the bank's AAs.

Veterans Administration Mortgage Loans

VA mortgage loans are guaranteed by the VA for qualified military veterans. There is no down payment if the property appraises for the sale price or greater, and there are no monthly mortgage insurance payments. Credit underwriting is flexible. Over the course of the evaluation period, ONB originated 220 VA loans totaling \$51.8 million within the bank's AAs.

Federal Home Loan Bank of Indianapolis (FHLBI) Homeownership Initiatives

FHLBI commits a percentage of its annual net income to fund Affordable Housing Program (AHP), Homeownership Opportunities Program (HOP), Neighborhood Impact Program (NIP), and Accessibility Modifications Program (AMP). Since all grants must be accessed through an FHLBI member, ONB administers these funds to support LMI families. Over the course of the evaluation period, ONB originated 1,213 FHLBI loans totaling \$321.5 million within the bank's AA.

Affordable Housing Program – Assists nonprofit housing providers, economic development groups, and housing developers who compete for annual grants up to \$500,000 per project. The grants help fund the acquisition, construction, or rehabilitation of properties for use as low-income, affordable rental or owner-occupied housing projects. These awards support a multitude of affordable housing solutions for veterans, people with disabilities, young adults transitioning out of the foster care system, and many others.

Homeownership Opportunities Program – Helps first-time homebuyers with DPA and closing costs, thus improving their eligibility for mortgage financing. Originating first mortgages, ONB can request up to \$5,000 in HOP grants per household. ONB processes non-FHLBI originators' requests up to \$4,000 in HOP grants per household.

Neighborhood Impact Program – Assists existing homeowners rehabilitate their homes, thus helping to preserve property values in local communities. This program provides funds for repairs including new windows, furnaces, roofs, siding, and other deferred maintenance types of repairs with NIP grants of up to \$7,500.

Accessibility Modifications Program – Aids seniors and owner-occupied households with a person(s) with a permanent disability with home modifications that will allow them to remain in their current homes. Eligible accessibility modifications, such as ramps, grab bars, roll-in showers, and widened doorways, qualify for up to \$10,000 in grant funding.

Indiana Housing and Community Development Authority's (IHCDA) Next Home Program

The Next Home Program provides DPA that can be used with either FHA or conventional financing. The program allows for DPA for first time homebuyers in LMI geographies. Over the course of the evaluation period, ONB originated 106 of these loans totaling \$13.2 million within the bank's AA. The following is a breakdown of the loans by rating area:

- 74 loans totaling \$9.1 million in the state of Indiana
- 29 loans totaling \$3.6 million in the Evansville IN-KY MMSA
- 2 loans totaling \$322,999 in the South Bend-Elkhart-Mishawaka CSA
- 1 loan totaling \$244,350 in the Louisville KY-IN MMSA

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c) in determining a national bank's 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 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 Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) 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

Evansville IN-KY MMSA

CRA rating for the Evansville IN-KY MMSA¹: 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 reflect excellent responsiveness to AA credit needs.
- The bank exhibits good geographical distribution and an adequate borrower distribution of loans.
- The bank is a leader in making CD loans and makes extensive use of flexible home mortgage lending products. CD loans and flexible lending had a significantly positive impact on the Lending Test rating.
- The level of qualified investments is excellent.
- The bank’s service delivery systems are readily accessible to geographies and individuals of different income levels in its AAs.
- The bank is a leader in providing CD services.

Description of Institution’s Operations in the Evansville IN-KY MMSA

The Evansville IN-KY MMSA (Evansville MMSA) consists of complete counties of Posey, Vanderburgh, and Warrick in Indiana, and Henderson in Kentucky.

The bank’s AA has 78 census tracts (CTs) which include 11 low-income, 18 moderate-income, 33 middle-income, 14 upper-income, and two NA-income. The AA complies with the regulation and does not arbitrarily exclude any LMI areas.

The bank operates 13 branches and 17 deposit-taking ATMs within the AA.

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

¹ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Table A – Demographic Information						
Assessment Area: Evansville IN-KY MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	78	14.1	23.1	42.3	17.9	2.6
Population by Geography	314,263	8.9	19.0	45.3	26.7	0.2
Housing Units by Geography	139,778	10.0	20.8	44.9	24.0	0.3
Owner-Occupied Units by Geography	85,908	5.7	13.6	48.2	32.4	0.1
Occupied Rental Units by Geography	40,032	15.9	34.2	39.3	10.1	0.5
Vacant Units by Geography	13,838	19.3	27.1	40.7	12.4	0.6
Businesses by Geography	25,790	8.5	20.1	38.3	29.0	4.1
Farms by Geography	1,163	3.5	8.9	55.5	31.5	0.5
Family Distribution by Income Level	81,857	21.3	17.6	20.6	40.4	0.0
Household Distribution by Income Level	125,940	23.6	17.1	17.4	41.9	0.0
Median Family Income MSA - 21780 Evansville, IN-KY MSA		\$61,595	Median Housing Value			\$118,144
			Median Gross Rent			\$690
			Families Below Poverty Level			11.1%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Housing Characteristics

Conditions in the housing market make it challenging for home buyers as demand exceeds housing supply and prices continue to trend upwards.

The AA is a high cost housing area, limiting access to affordable home ownership among low-income borrowers. The 2021 FFIEC adjusted median family income (AMFI) in the AA is \$78,400. According to Realtor.com data, the median housing value in the AA is \$154,900 and \$172,450 in January 2019 and December 2021, respectively, reflecting a 11.3 percent increase.

Assuming a 30-year mortgage with a five percent interest rate and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$39,200 per year (or less than 50 percent of the 2021 FFIEC AMFI in the AA) could afford a \$182,556 mortgage with a payment of \$980 per month. A moderate-income borrower making \$62,720 per year (or less than 80 percent of the 2021 FFIEC AMFI in the AA) could afford a \$292,090 mortgage with a payment of \$1,568 per month. This illustrates that LMI borrowers would not be challenged to qualify for a mortgage loan in the AA.

Community Contacts

The OCC made three community contacts in the AA during the evaluation period, which included a city agency and two nonprofit organizations focused on neighborhood revitalization and economic development in LMI areas. Community contacts indicated that the following are identified needs within the bank's AA:

- Home mortgages in LMI areas
- Higher-wage employment opportunities
- Crime prevention
- Financing to owners of multifamily building due to the lack of affordable rental properties
- Small loans to small businesses particularly to start-up businesses
- Funding to nonprofits

Scope of Evaluation in the Evansville IN-KY MMSA

The Evansville MMSA was selected for analysis using full-scope procedures because it is the only AA in the rating area. The AA represents 19.2 percent of total bank branches, 9.5 percent of mortgage loans, 11.7 percent of small business loans, and 10.2 percent total bank deposits.

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 is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs considering the number and dollar amount of home mortgage, small business, and small farm loans relative to the bank's lending capacity based on deposits, competition, and market presence.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Evansville MMSA	2,486	2,609	62	53	5,210

Dollar Volume of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Evansville MMSA	401,089	373,417	6,009	63,800	844,315

According to FDIC Deposit Market Share data, ONB had \$43.8 billion in deposits in the Evansville MMSA. The bank had a 35.1 percent deposit market share, which ranked first out of 18 deposit-taking institutions. The bank's deposit market share ranking was in the top 5.6 percent of all deposit-taking institutions in the AA.

According to 2021 peer mortgage data, ONB had a 5.0 percent market share of HMDA loan originations in the Evansville MMSA. The bank's market share of HMDA loan originations was well below their deposit market share.

The bank's HMDA market share ranked sixth out of 313 HMDA lenders in the AA. The bank's market share ranking of HMDA loan originations ranked in the top 1.9 percent of all lenders in the AA. The bank's market share ranking of HMDA loan originations was weaker than their deposit market share ranking.

According to 2020 peer small business data, ONB had a 24.6 percent market share of small business loan originations in the Evansville MMSA. The bank's market share of small business loan originations was below their deposit market share. The bank's market share of small business loan originations ranked first out of 102 small business lenders in the AA. The bank's market share ranked in the 1.0 percent. The bank's market share ranking of small business loan originations was similar to their deposit market share ranking.

According to 2020 peer small business data, ONB had a 6.4 percent market share of small farm loan originations. The bank's market share of small farm loan originations was well below their deposit market share. The bank's market share of small farm loan originations ranked fourth out of 17 lenders in the AA. The bank's market share ranking of small farm loan originations was in the top 23.5 percent. The bank's market share ranking of small farm loan originations was well below their deposit market share ranking.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects a good distribution.

Refer to Table O 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 proportion of bank home mortgage loans in low-income geographies was well below the percentage of owner-occupied units and near to the aggregate industry distribution of home mortgage loans to those geographies. The proportion of home mortgage loans in moderate-income geographies was near to the percentage of owner-occupied housing and the aggregate industry distribution of home mortgage loans to those geographies.

Small Loans to Businesses

The geographic distribution of small business loans reflects an excellent distribution.

Refer to Table Q 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 proportion of loans in LMI geographies exceeded the percentage of business and the aggregate industry distribution of small loans to businesses in those geographies.

Small Loans to Farms

The geographic distribution of small farm loans reflects very poor distribution.

Refer to Table S 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 farms.

The proportion of loans in LMI geographies was significantly below the percentage of farms and the aggregate industry distribution of loans to those geographies.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed the bank's lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels and business and farms of different sizes.

Home Mortgage Loans

The distribution of home mortgage loans among individuals of different income levels is adequate.

Refer to Table P in the MMSA section of Appendix D for the facts and data used to evaluate the borrower distribution of home mortgage loan originations and purchases.

The proportion of loans to low-income borrowers is well below the percentage of low-income families and near to the aggregate industry distribution of loans to those borrowers. The proportion of loans to moderate-income borrowers is below the percentage of families and the aggregate industry distribution loans to those borrowers.

Small Loans to Businesses

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

Refer to Table R in the MMSA 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 proportion of bank loans to businesses with less than \$1 million in revenue is significantly below the percentage of businesses and near to the aggregate industry distribution of loans to those businesses.

Small Loans to Farms

The distribution of loans to farms of different sizes is adequate.

Refer to Table T in the MMSA 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 proportion of bank loans to small farms is well below the percentage of farms and below the aggregate industry distribution of loans to those farms.

Community Development Lending

The bank is a leader in making CD loans and this had a significantly positive impact on the Lending Test rating in the Evansville MMSA.

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

Throughout the evaluation period, ONB originated 53 CD loans totaling \$63.8 million. The volume of CD loans was equivalent to 16.3 percent of allocated tier 1 capital. Loans for revitalization and stabilization were responsive to needs during the pandemic. The bank's CD loans did not demonstrate complexity.

Examples of CD loans the bank made in the AA include:

- 44 loans totaling \$49.7 million to revitalize and stabilize the community through the PPP.
- A \$6.5 million loan to support a local airport project. The project is in partnership with local municipal governments, which will improve the airport and provide job opportunities in the AA for LMI individuals.
- A \$1.6 million loan for community service. The organization provides tools for disabled people to become self-sufficient. The loan proceeds helped 43 LMI individuals gain employment through this agency.

Product Innovation and Flexibility

The bank makes extensive use of flexible lending practices to serve AA credit needs.

Refer to the Other Loan Performance section under the Scope of the Evaluation section for additional details regarding other programs.

INVESTMENT TEST

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

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

The bank has an excellent level of qualified CD investment and grants, often in a leadership position particularly those that are not routinely provided by private investors.

The bank exhibits excellent responsiveness to credit and community economic development needs. The bank makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

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	13	17,144	254	24,019	267	100.0	41,163	100.0	0	0
* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date. ** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.										

ONB had 267 qualified CD investments and donations totaling \$41.2 million, which is equivalent to 10.5 percent of allocated tier 1 capital. The bank made four current period CD investments which totaled \$21.5 million and 250 qualified grants totaling \$2.5 million. Additionally, the AA benefitted from the ongoing impact of 13 prior period CD investments with an outstanding balance of \$17.1 million. The bank had no unfunded commitment. The bank's CD investments were responsive to affordable housing needs and community services to LMI communities in the AA.

The current period investments consisted of \$10.4 million in mortgage-backed securities (MBS), \$1.5 million in municipal bonds, and \$12.9 million in school bonds serving LMI communities.

The bank complemented its investments with \$90,285 of in-kind contributions:

- \$64,300 in several computers and equipment to 11 different nonprofit organizations.
- \$17,440 in leased commercial space to a nonprofit organization, which serves as their headquarters and operations center. The mission of the organization is to create and sustain safe and affordable housing, to provide compassionate supportive services, and to promote community and economic development within the urban core of our community.
- \$8,545 in furniture to a nonprofit organization for their administrative offices. The mission of the organization is to change lives and LMI communities and build hope through simple, decent homeownership in partnership with volunteers and community support.

SERVICE TEST

The bank's performance under the Service Test in Evansville MMSA is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Evansville MMSA is good.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
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	Low	Mod	Mid	Upp
Evansville MMSA	100.0	13	100.0	7.7	30.8	38.5	15.4	8.9	19.0	45.3	26.7

The bank has 13 branches in the AA, with one in a low-income CT and four in moderate-income CTs. The percentage of branches located in LMI areas exceeds the percentage of the population residing in the geographies.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings		Net change in Location of Branches (+ or -)			
	# of Branch Openings	# of Branch Closings	Low	Mod	Mid	Upp
Evansville MMSA	0	2	-1	0	0	-1

To the extent changes have been made, branch closings has adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank did not open branches during the evaluation period. In April 2020, the bank closed a branch in a low-income CT branch and a branch in an upper-income CT.

The bank complements its traditional service delivery methods in the AA with certain alternative retail delivery systems, such as bill payment, deposit-taking ATMs, debit card, direct deposit, mobile banking, online banking, remote deposit service, and telephone banking.

ONB has 17 ATMs in the AA, of which seven are deposit-taking ATMs in LMI CTs of the AA. We did not place significant weight on alternative delivery systems, as the bank did not maintain or provide metrics to determine their effectiveness in helping meet the needs of LMI individuals.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. All branches operate during similar banking hours.

During the pandemic, the bank offered additional services such as curbside banking, cashing stimulus checks for non-customers, and offering leniency on waiving non-sufficient funds and overdraft fees, and early withdrawal penalties.

With lobby closures, branch personnel worked to help meet community banking needs through drive-through facilities and digital banking services. The bank received positive consideration for these activities in response to the pandemic.

Community Development Services

The bank is a leader in providing CD services.

CD services were effective and responsive in addressing the community's needs. During the evaluation period, 168 bank employees from various lines of business partnered with 105 organizations and

contributed a total of 5,907 hours supporting LMI individuals and families. This included serving on committees and boards for 71 various organizations that promote affordable housing, community services, and economic developments for LMI communities within the AA. Services reflected ongoing relationships with several organizations in the AA.

Refer to the Other Performance section under the Scope of the Evaluation section for additional details regarding the bank's CD services.

The following are examples of CD services provided in this AA:

- A bank employee provided 399 hours of board service to a nonprofit organization that offers shelter and a food pantry for homeless families. The organization offers personal hygiene products that are necessary items that cannot be purchased with food stamps.
- 16 bank employees provided 367 hours of board service to a nonprofit organization that provides homeownership for LMI families. This organization constructs, rehabilitates, and preserves homes while providing training and access to resources to help improve shelter conditions.
- Ten employees provided 125 hours as board and committee members to four different groups supporting small businesses. The groups provide leadership and value to members by promoting an environment where businesses, organizations, and communities can position themselves for success and further enhance the quality of life within the AA

Louisville-Jefferson County KY-IN MMSA

CRA rating for the Louisville-Jefferson County KY-IN MMSA²: 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 reflect excellent responsiveness to AA credit needs.
- The bank exhibits poor geographical distribution and very poor borrower distribution of loans.
- The bank is a leader in making CD loans. The bank makes extensive use of flexible home mortgage products. CD lending and flexible loan products had a significantly positive impact on the Lending Test rating.
- The bank has an excellent level of qualified investments.
- The bank’s service delivery systems are reasonably accessible to geographies and individuals of different income levels in its AAs.
- The bank provides an adequate level of CD services.

Description of Institution’s Operations in Louisville-Jefferson County KY-IN MMSA

The Louisville-Jefferson County KY-IN MMSA (Louisville MMSA) is composed of the complete counties of Jefferson in Kentucky and Clarksville in Indiana.

The bank’s AA has 217 CTs which includes 31 low-income, 51 moderate-income, 71 middle-income, 62 upper-income, and two NA-income. The AA complies with the regulation and does not arbitrarily exclude any LMI areas.

The bank operates four branches and three deposit-taking ATMs within the AA.

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

² This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Table A – Demographic Information						
Assessment Area: Louisville-Jefferson County KY-IN MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	217	14.3	23.5	32.7	28.6	0.9
Population by Geography	868,990	10.9	21.0	37.0	30.7	0.4
Housing Units by Geography	388,758	11.3	22.0	36.7	29.5	0.5
Owner-Occupied Units by Geography	220,477	5.2	17.3	39.7	37.7	0.1
Occupied Rental Units by Geography	129,412	18.6	28.7	33.1	18.6	1.0
Vacant Units by Geography	38,869	21.7	26.2	31.6	19.0	1.5
Businesses by Geography	96,624	8.2	17.2	30.9	39.7	4.0
Farms by Geography	2,050	5.3	13.7	36.4	43.4	1.2
Family Distribution by Income Level	213,966	22.4	17.9	19.7	40.0	0.0
Household Distribution by Income Level	349,889	25.9	16.2	17.8	40.1	0.0
Median Family Income MSA - 31140 Louisville/Jefferson County, KY-IN MSA		\$64,965	Median Housing Value			\$157,760
			Median Gross Rent			\$750
			Families Below Poverty Level			11.3%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Housing Characteristics

Conditions in the housing market make it challenging for home buyers as demand exceeds housing supply and prices continue to trend upwards. The lack of affordable housing has made it difficult for LMI families to purchase homes and to rent housing in the AA.

The AA is a high cost housing area, limiting access to affordable home ownership among low-income borrowers. The 2021 FFIEC AMFI in the AA is \$75,500. According to Realtor.com data, the median housing value in the AA is \$249,900 and \$252,500 in January 2019 and December 2021, respectively, reflecting a 1 percent increase.

Assuming a 30-year mortgage with a 5 percent interest rate, and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$37,750 per year (or less than 50 percent of the 2021 FFIEC AMFI in the AA) could afford a \$175,803 mortgage with a payment of \$944 per month. A moderate-income borrower making \$60,400 per year (or less than 80 percent of the 2021 FFIEC AMFI in the AA) could afford a \$281,285 mortgage with a payment of \$1,510 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA.

Community Contacts

The OCC made three community contacts in the AA during the evaluation period, which included two nonprofit organizations focused on neighborhood revitalization and economic development in LMI areas and a city agency. Community contacts indicated that the following are identified needs within the bank's AA:

- Home mortgages in LMI areas and for senior citizens
- Small loans to small businesses especially to start-up businesses
- Small loans to build credit for LMI individuals

Scope of Evaluation in the Louisville-Jefferson County KY-IN MMSA

The Louisville MMSA was selected for analysis using full-scope procedures because it is the only AA in the rating area. The AA represents 2.5 percent of total bank branches, 1.7 percent of mortgage loans, 1.5 percent of small business loans, and 1.4 percent total bank deposits.

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 Low Satisfactory.

Based on a full-scope review, the bank’s performance in the Louisville MMSA is adequate.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs considering the number and dollar amount of home mortgage and small business loans relative to the bank’s lending capacity based on deposits, competition, and market presence.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Louisville MMSA	491	290	1	5	787

Dollar Volume of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Louisville MMSA	172,722	56,992	9	55,500	285,223

According to FDIC Deposit Market Share, ONB had \$274.5 million in deposits in the Louisville MMSA. The bank’s had a 0.8 percent market deposit market share which ranked 14th out of 30 deposit-taking institutions in the AA. The bank’s deposit market share ranking was in the top 46.7 percent of all deposit-taking institutions in the AA.

According to 2021 peer HMDA data, ONB had a 0.3 percent market share of HMDA loan originations in the Louisville MMSA. The bank’s market share of HMDA loan originations was well below their deposit market share. The bank’s market share of HMDA loan originations ranked 67th out of 498 HMDA lenders in the AA.

The bank's market share ranking of HMDA loan originations was in the top 13.5 percent of all HMDA lenders in the AA. The bank's market share ranking of HMDA loan originations was stronger than their deposit market share ranking.

According to 2020 peer small business data, ONB had a 0.8 percent market share of small business loan originations in the Louisville MMSA. The bank's market share of small business loan originations approximates their deposit market share ranking. The bank's market share of small business loan originations ranked 21st out of 156 small business loan lenders in the AA. The bank market share ranked in the top 13.5 percent of all small business lenders. The bank's market share ranking of small business loan originations was stronger than their deposit market share ranking.

Distribution of Loans by Income Level of the Geography

The bank exhibits poor geographic distribution of loans in its AA.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects a very poor distribution.

Refer to Table O 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 proportion of bank loans to low-income geographies was significantly below the percentage of owner-occupied housing and well below the aggregate industry distribution of loans to those geographies. The proportion of bank loans in moderate-income geographies was significantly below the percentage of owner-occupied housing and the aggregate industry distribution of loans to those geographies.

Small Loans to Businesses

The geographic distribution of small business loans reflects an adequate distribution.

Refer to Table Q 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 loans to low-income geographies exceeded the percentage of businesses and the aggregate industry distribution of loans to those businesses. The proportion of loans in moderate-income geographies was significantly below the percentage of businesses and the aggregate industry distribution of loans to those geographies.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed the bank's lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a very poor distribution of loans among individuals of different income levels and business of different sizes.

Home Mortgage Loans

The distribution of home mortgage loans among individuals of different income levels is very poor.

Refer to Table P in the MMSA 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.

When considering our conclusions for low-income borrowers, we considered the fact that housing is not affordable to those borrowers in this AA. The proportion of loans to low-income borrowers was significantly below the percentage of families and the aggregate distribution of loans to those borrowers. The proportion of loans to moderate-income borrowers was well below the percentage of families and significantly below the aggregate industry distribution of loans to those borrowers.

Small Loans to Businesses

The distribution of loans to businesses of different sizes is poor.

Refer to Table R in the MMSA 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 proportion of bank loans to businesses with revenues less than \$1 million was significantly below the percentage of businesses and well below the aggregate industry distribution of loans to those businesses.

Community Development Lending

The bank is a leader in making CD loans. CD loans had a significantly positive impact on the Lending Test rating.

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

Throughout the evaluation period the bank made five CD loans totaling \$55.5 million. The volume of CD loans was equivalent to 193.6 percent of allocated tier 1 capital. CD loans were responsive to community needs related to economic development and affordable housing. The bank's loans were innovative and demonstrated leadership.

Examples of CD loans the bank made in the AA include:

- \$25 million loan that supports economic development. The loan was part of a municipal plan and located in an urban enterprise zone within a TIF district in the AA. The project is part of a much larger plan that employs approximately 10,000 people in the AA. Funds were used to support infrastructure improvements to the project.

- \$16.4 million loan to support affordable housing a project. The proceeds were for a 535-unit multifamily project, with affordable rents to LMI individuals, located within a moderate-income CT.
- \$4.7 million loans to support economic development. The bank proceeds funded an SBA 7A loan. The loan proceeds allowed for the creation of 15 new jobs, and the business is in a low-income CT.

Product Innovation and Flexibility

The bank makes extensive use of flexible lending practices to serve AA credit needs.

Refer to the Other Loan Performance section under the Scope of the Evaluation section for additional details regarding other programs.

INVESTMENT TEST

The bank’s performance under the Investment Test in Louisville MMSA is rated Outstanding.

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

The bank has an excellent level of qualified CD investment and grants, often in a leadership position and particularly those that are not routinely provided by private investors.

The bank exhibits excellent responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

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	19	1,436	98	19,523	117	100.0	20,959	100.0	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.
 ** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

ONB had 117 qualified CD investments and donations totaling \$20.9 million, which is equivalent to 73.2 percent of allocated tier 1 capital. The bank made 41 current period CD investments which totaled \$19.1 million and 57 qualified grants totaling \$448,500. Additionally, the AA benefitted from the ongoing impact of 19 prior period CD investments with an outstanding balance of \$1.4 million. The bank had no unfunded commitments. The bank’s CD investments were responsive to affordable housing needs, community services to LMI communities, economic development, and revitalization in the AA.

The investments consisted of \$11.9 million in school bonds serving LMI communities, \$6.4 million in MBS, and \$250,000 in a Community Development Financial Institution (CDFI).

SERVICE TEST

The bank's performance under the Service Test in Louisville MMSA is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Louisville MMSA is adequate.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
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	Low	Mod	Mid	Upp
Louisville MMSA	100.0	4	100.0	0.0	25.0	0.0	50.0	10.9	21.0	37.0	30.7

The bank has four branches in the AA, with none in a low-income CTs and one in a moderate-income CT. The percentage of branches located in LMI areas is below the percentage of the population residing in the geographies.

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

To the extent changes have been made, the bank's closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank did not open branches during the evaluation period. In April 2020, the bank closed a branch in an upper-income CT.

The bank complements its traditional service delivery methods in the AA with certain alternative retail delivery systems, such as bill payment, deposit-taking ATMs, debit card, direct deposit, mobile banking, online banking, remote deposit service, and telephone banking.

ONB has three ATMs in the AA, of which one is a deposit-taking ATM in a moderate-income CT of the AA. We did not place significant weight on alternative delivery systems, as the bank did not maintain or provide metrics to determine their effectiveness in helping meet the needs of LMI individuals.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. All branches operate during similar banking hours.

During the pandemic, the bank offered additional services such as curbside banking, cashing stimulus checks for non-customers, and offering leniency on waiving non-sufficient funds and overdraft fees, and early withdrawal penalties. With lobby closures, branch personnel worked to help meet community banking needs through drive-through facilities and digital banking services. The bank received positive consideration for these activities in response to the pandemic.

Community Development Services

The bank provides an adequate level of CD services.

CD services were effective and responsive in addressing the community's needs. During the evaluation period, 15 bank employees from various lines of business partnered with 18 organizations and contributed a total of 264 hours supporting LMI individuals and families. This included serving on committees and boards for 10 various organizations that promote community services and economic developments for LMI communities within the AA.

Refer to the Other Performance section under the Scope of the Evaluation section for additional details regarding the bank's CD services.

The following are examples of CD services provided in this AA:

- Two employees provided 75 hours to support a community-based nonprofit organization. The organization offers financial education to LMI residents, including the elderly. Services consist of emergency financial assistance to pay overdue utilities, rent, mortgages, medical bills, and insurances. The organization assist to pay for needed medications, car repairs, transportation, and short-term childcare services. They have partnerships with staffing companies that can provide employment opportunities as well as job training.
- An employee provided 27 hours of board service to a nonprofit organization that provides domestic violence prevention and intervention services within the AA. The domestic violence survivors that received assistance from this organization were considered LMI.

South Bend-Elkhart-Mishawaka IN-MI CSA

CRA rating for the South Bend-Elkhart-Mishawaka IN-MI CSA³: Satisfactory

The Lending Test is rated:	High Satisfactory
The Investment Test is rated:	High Satisfactory
The Service Test is rated:	Outstanding

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs.
- The bank exhibits good geographical distribution and poor borrower distribution of loans.
- The bank is a leader in making CD loans. CD lending had a significantly positive impact on the Lending Test rating.
- The bank has a significant level of qualified investments.
- The bank’s service delivery systems are readily accessible to geographies and individuals of different income levels in its AAs.
- The bank provides a significant level of CD services.

Description of Institution’s Operations in the South Bend-Elkhart-Mishawaka IN-MI CSA

ONB has four AAs within the state of Indiana and Michigan which were combined and presented as the South Bend-Elkhart-Mishawaka IN-MI CSA (South Bend CSA). The four MSAs consisted of South Bend-Mishawaka IN-MI MSA, Michiana Market Non-MSA, Elkhart-Goshen MSA, and Niles MSA. The South Bend CSA consists of the complete counties of Elkhart, Kosciusko, St. Joseph in Indiana, and Berrien in Michigan.

The bank’s AA has 179 CTs which includes 19 low-income, 34 moderate-income, 84 middle-income, 41 upper-income, and one NA-income. The AA complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas.

The bank operates six branches and six deposit-taking ATMs within the AA.

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

³ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Table A – Demographic Information						
Assessment Area: South Bend-Elkhart-Mishawaka IN-MI						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	179	10.6	19.0	46.9	22.9	0.6
Population by Geography	701,479	6.2	16.2	51.2	26.4	0.0
Housing Units by Geography	307,421	6.9	15.8	53.7	23.6	0.0
Owner-Occupied Units by Geography	184,797	3.3	12.5	54.0	30.2	0.0
Occupied Rental Units by Geography	78,400	14.0	22.7	50.2	13.2	0.0
Vacant Units by Geography	44,224	9.8	17.5	58.4	14.3	0.0
Businesses by Geography	58,371	7.1	15.1	51.7	26.1	0.0
Farms by Geography	2,333	1.6	6.9	61.2	30.3	0.0
Family Distribution by Income Level	177,163	20.3	17.3	21.4	41.1	0.0
Household Distribution by Income Level	263,197	22.6	16.5	18.5	42.4	0.0
Median Family Income - 21140 Elkhart-Goshen, IN MSA		\$55,551	Median Housing Value			\$123,950
Median Family Income - 35660 Niles, MI MSA		\$57,640	Median Gross Rent			\$702
Median Family Income - 43780 South Bend-Mishawaka, IN-MI MSA		\$57,692	Families Below Poverty Level			12.3%
Median Family Income IN Non-MSAs		\$55,715				
<i>Source: 2015 ACS and 2021 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Housing Characteristics

Conditions in the housing market make it challenging for home buyers as demand exceeds housing supply and prices continue to trend upwards. The lack of affordable housing has made it difficult for LMI families to purchase homes and to rent housing in the AA.

The AA is a high cost housing area, limiting access to affordable home ownership among low-income borrowers. The 2021 FFIEC AMFI in the AA is \$72,700. According to Realtor.com data, the median housing value in the AA is \$153,450 and \$223,500 in January 2019 and December 2021, respectively, reflecting a 45.7 percent increase.

Assuming a 30-year mortgage with a 5 percent interest rate and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$36,350 per year (or less than 50 percent of the 2021 FFIEC AMFI in the AA) could afford a \$169,283 mortgage with a payment of \$909 per month. A moderate-income borrower making \$58,160 per year (or less than 80 percent of the 2021 FFIEC AMFI in the AA) could afford a \$270,853 mortgage with a payment of \$1,454 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA.

Community Contacts

The OCC made two community contacts in the AA during the evaluation period, which included a nonprofit organization focused on neighborhood revitalization and economic development in LMI areas and a county agency. Community contacts indicated that the following are identified needs within the bank's AA:

- Home mortgages in LMI areas
- Financing to owners of multifamily building due to the lack of affordable rental properties
- Small loans to small businesses

Scope of Evaluation in the South Bend CSA

The South Bend CSA was selected for analysis using full-scope procedures because it is the only AA in the rating area. The AA represents 3.8 percent of total bank branches, 2.8 percent of mortgage loans, 3.2 percent of small business loans, and 1.9 percent total bank deposits.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE SOUTH BEND CSA

LENDING TEST

The bank's performance under the Lending Test in the South Bend CSA is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the South Bend CSA is good.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs considering the number and dollar amount of home mortgage and small business loans relative to the bank's lending capacity based on deposits, competition, and market presence.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
South Bend CSA	765	694	2	11	1,472

Dollar Volume of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
South Bend CSA	150,395	135,368	600	16,800	303,163

According to FDIC Deposit Market Share data, ONB had a \$371.9 million in deposits in the South Bend MMSA. The bank had a 2.5 percent deposit market share in the AA. The bank's deposit market share ranked 11th out of 21 deposit-taking institutions. The bank's deposit market share ranking was in the top 52.4 percent of all deposit-taking institutions in the AA.

According to 2021 peer HMDA data, ONB had 0.8 percent market share of HMDA loan originations. The bank's market share of HMDA loan originations was well below their deposit market share. The bank's market share of HMDA loan originations ranked 34th out of 516 HMDA lenders in the AA. The bank's market share ranking of HMDA loan originations was stronger than their deposit market share ranking.

According to 2020 peer small business data, ONB had a 2.9 percent market share of small business loan originations. The bank's market share of small business loan originations was stronger than their deposit market share. The bank's market share of small business loan originations ranked 14th out of 139 lenders in the AA. The bank's market share ranking of small business loan originations was in the top 10.1 percent of all lenders in the AA. The bank's market share ranking of small business loan originations was stronger than their deposit market share ranking.

Distribution of Loans by Income Level of the Geography

The bank exhibits good geographic distribution of loans in its AA.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects a good distribution.

Refer to Table O 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 proportion of bank loans in low-income geographies was well below the percentage of owner-occupied housing and near to the aggregate industry distribution of loans to those geographies. The proportion of loans in moderate-income geographies was below the percentage of owner-occupied housing and approximates the aggregate industry distribution of loans to those geographies.

Small Loans to Businesses

The geographic distribution of small business loans reflects excellent distribution.

Refer to Table Q 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 proportion of bank loans in low-income geographies was below the percentage of businesses and near to the aggregate industry distribution of loans to those geographies. The proportion of loans in moderate-income geographies exceeded the percentage of businesses and the aggregate industry distribution of loans to those geographies.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed the bank's lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits poor distribution of loans among individuals of different income levels and business of different sizes.

Home Mortgage Loans

The distribution of home mortgage loans among individuals of different income levels is poor.

Refer to Table P in the MMSA 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 proportion of loans to low-income borrowers was significantly below the percentage of families and well below the aggregate distribution of loans to those borrowers. The proportion of loans to moderate-income borrowers was below the percentage of families and well below the aggregate distribution of loans to those borrowers.

Small Loans to Businesses

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

Refer to Table R in the MMSA 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 proportion of bank loans to businesses with revenues less than \$1 million was significantly below the percentage of businesses and below the aggregate industry distribution of loans to those businesses.

Community Development Lending

The bank is a leader in making CD loans. CD loans had a significantly positive impact on the Lending Test rating.

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

The bank made 11 CD loans totaling \$16.8 million. CD loan volume was equivalent to 43.3 percent of allocated tier 1 capital. CD loans were responsive to community needs relating to economic development and the needs arising from the pandemic. The bank loans demonstrated a moderate amount of leadership and complexity.

Examples of CD loans the bank made in the AA include:

- \$9.0 million for economic development. The loan proceeds were used for construction of a warehouse with estimates it will create 210 jobs, primarily for LMI individuals.
- \$1.6 million SBA loan to purchase a building used for packaging and distribution of consumer products. Loan proceeds supported economic development in the AA.

- Two loans that supported revitalize and stabilization via the PPP program. PPP loans that qualified as CD loans in the AA totaled \$1.4 million. The qualified PPP loans were in an LMI CT within the AA.

Product Innovation and Flexibility

The bank makes limited use of innovative and/or flexible lending practices to serve AA credit needs.

Refer to the Other Loan Performance section under the Scope of the Evaluation section for additional details regarding other programs.

INVESTMENT TEST

The bank’s performance under the Investment Test in South Bend CSA is rated High Satisfactory.

Based on a full-scope review, the bank’s performance in the South Bend CSA is good.

The bank has an excellent level of qualified CD investment and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors

The bank exhibits good responsiveness to credit and community economic development needs. The bank rarely uses innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

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 CSA	15	6,058	52	4,048	67	100.0	\$10,107	100.0	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.
 ** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

ONB had 67 qualified CD investments and donations totaling \$10.1 million, which is equivalent to 26.0 percent of allocated tier 1 capital. The bank made 18 current period CD investments which totaled \$3.9 million and 34 qualified grants totaling \$116,900. Additionally, the AA benefitted from the ongoing impact of 15 prior period CD investments with an outstanding balance of \$6 million. The bank had no unfunded commitments. The bank’s CD investments were responsive to affordable housing needs and community services to LMI communities in the AA.

The investments consisted of \$2.5 million in MBS, \$1.4 million in school bonds, and \$60,000 in other funds.

SERVICE TEST

The bank's performance under the Service Test in South Bend CSA is rated Outstanding. Based on a full-scope review, the bank's performance in the South Bend CSA is excellent.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
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	Low	Mod	Mid	Upp
South Bend CSA	100.0	6	100.0	33.3	50.0	0.0	16.7	6.2	16.2	51.2	26.4

The bank has six branches in the AA, with two in low-income CTs and three in moderate-income CTs. The percentage of the branch located in LMI areas significantly exceeds the percentage of the population residing in the geographies.

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

To the extent changes have been made, the bank's closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank did not open branches during the evaluation period. In April 2020, the bank closed a branch in an upper-income CT.

The bank complements its traditional service delivery methods in the AA with certain alternative retail delivery systems, such as bill payment, deposit-taking ATMs, debit card, direct deposit, mobile banking, online banking, remote deposit service, and telephone banking.

ONB has six ATMs in the AA, of which four are deposit-taking ATMs in LMI CTs. We did not place significant weight on alternative delivery systems, as the bank did not maintain or provide metrics to determine their effectiveness in helping meet the needs of LMI individuals.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. All branches operate during similar banking hours.

During the pandemic, the bank offered additional services such as curbside banking, cashing stimulus checks for non-customers, and offering leniency on waiving non-sufficient funds and overdraft fees and early withdrawal penalties. With lobby closures, branch personnel worked to help meet community

banking needs through drive-through facilities and digital banking services. The bank received positive consideration for these activities in response to the pandemic.

Community Development Services

The bank provides a significant level of CD services.

CD services were effective and responsive in addressing the community's needs. During the evaluation period, 26 bank employees from various lines of business partnered with 27 organizations and contributed a total of 1,804 hours supporting LMI individuals and families. This included serving on committees and boards for 14 various organizations that promote community services, and economic developments for LMI communities within the AA.

Refer to the Other Performance section under the Scope of the Evaluation section for additional details regarding the bank's CD services.

The following are examples of CD services provided in this AA:

- Three employees provided 1,042 hours as a board and committee members to a group supporting small businesses. The group provides leadership and value to members by promoting an environment where businesses, organizations, and communities can position themselves for success and further enhance the quality of life within the AA.
- A bank employee provided 89 hours as a board member to community-based nonprofit that assist area LMI residents in securing resources and to provide educational and life-enrichment skills through their programs.
- A bank employee provided 36 hours of financial education to the constituents of a nonprofit organization, which enables young people to reach their full potential. The organization's programs empower inclusion for LMI youth and adults.

State Rating

State of Illinois

CRA rating for the State of Illinois⁴: 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 reflect good responsiveness to AA credit needs.
- The bank exhibits excellent geographical distribution and adequate borrower distribution of loans.
- The bank has a significant level of qualified investments.
- The bank's service delivery systems are accessible to geographies and individuals or different income levels in its AAs.
- The bank provides an adequate level of CD services.

Description of Institution's Operations in the State of Illinois

ONB has one AA within the state of Illinois which is the Danville MSA.

Refer to Appendix A, Scope of Examination, for a list of counties within each AA. The AA complies with the regulation and does not arbitrarily exclude any LMI areas.

The state of Illinois represents the smallest rated area by deposits. ONB has \$371.4 million in deposits representing 1.9 percent of total bank deposits. ONB operates two branches within the state representing 1.2 percent of the total number of bank branches. The bank made 0.5 percent of its loan originations and purchases compared to total bank loans during the evaluation period in the state. The bank's primary loan products in the state of Illinois are home mortgages and small business loans.

According to the FDIC deposit market share data, ONB had a 2.1 percent market share making it the 10th largest deposit holder out of 436 financial institutions in the state. The bank operates two branches and two deposit-taking ATMs within the state.

Danville MSA

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

⁴ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Danville MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	24	4.2	20.8	41.7	33.3	0.0
Population by Geography	80,368	4.3	18.6	47.2	29.9	0.0
Housing Units by Geography	36,093	4.1	17.1	47.6	31.2	0.0
Owner-Occupied Units by Geography	21,751	2.8	11.4	49.6	36.2	0.0
Occupied Rental Units by Geography	9,780	7.0	24.7	46.6	21.7	0.0
Vacant Units by Geography	4,562	4.0	28.6	40.0	27.4	0.0
Businesses by Geography	3,984	3.9	23.2	42.4	30.4	0.0
Farms by Geography	330	0.0	4.2	44.5	51.2	0.0
Family Distribution by Income Level	20,188	21.7	16.8	20.7	40.8	0.0
Household Distribution by Income Level	31,531	23.4	16.2	18.3	42.1	0.0
Median Family Income MSA - 19180 Danville, IL MSA		\$53,880	Median Housing Value			\$73,747
			Median Gross Rent			\$630
			Families Below Poverty Level			14.2%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The bank's AA has 24 CTs, which includes one low-income, five moderate-income, 10 middle-income, and eight upper-income. The AA complies with the regulation and does not arbitrarily exclude any LMI areas.

The bank operates two branches and two deposit-taking ATMs within the AA.

Housing Characteristics

Conditions in the housing market make it challenging for home buyers as demand exceeds housing supply and prices continue to trend upwards. The lack of affordable housing has made it difficult for LMI families to purchase homes and to rent housing in the AA.

The AA is a high cost housing area, limiting access to affordable home ownership among low-income borrowers. The 2021 FFIEC AMFI in the AA is \$59,300. According to Realtor.com data, the median housing value in the AA is \$70,700 and \$89,900 in January 2019 and December 2021, respectively, reflecting a 27.2 percent increase.

Assuming a 30-year mortgage with a 5 percent interest rate and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$29,650 per year (or less than 50 percent of the 2021 FFIEC AMFI in the AA) could afford a \$138,081 mortgage with a payment of \$741 per month. A moderate-income borrower making \$47,440 per year (or less than 80 percent of the 2021 FFIEC AMFI in the AA) could afford a \$220,930 mortgage with a payment of \$1,186 per month. This illustrates that LMI borrowers would not be challenged to qualify for a mortgage loan in the AA.

Community Contacts

The OCC made a community contact in the AA during the evaluation period to a nonprofit organization focused on community services to LMI neighborhoods. The community contact indicated that the need for banks to serve on boards and committees with nonprofits.

Scope of Evaluation in the State of Illinois

For the state of Illinois, the Danville MSA was selected for analysis using full-scope procedures because it is the only AA in the rating area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF ILLINOIS

LENDING TEST

The bank’s performance under the Lending Test in the state of Illinois is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Danville MSA is good.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs considering the number and dollar amount of home mortgage and small business loans relative to the bank’s lending capacity based on deposits, competition, and market presence.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Danville MSA	93	105	4	4	206	98.6	100.0
Statewide	--	--	--	3	3	14.4	--

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.
"--" data not available.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Danville MSA	6,696	11,208	747	4,000	22,651	38.8	100.0
Statewide	--	--	--	35,762	35,762	61.2	--

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.
"--" data not available.

According to FDIC Deposit Market Share data, ONB had \$371.4 million in deposits in the Danville MSA. The bank had a 23.4 percent market share of deposits in the AA. The bank’s deposit market share

ranked second out of 15 deposit-taking institutions in the AA. The bank's deposit market share ranking was in the top 13.3 percent of all deposit-taking institutions in the AA.

According to 2021 peer HMDA data, ONB had a 1.6 percent market share of HMDA loan originations in the Danville MSA. The bank's market share of HMDA loan originations was well below their deposit market share in the AA. The bank's market share of HMDA loan originations ranked 16th out of 126 lenders in the AA. The bank's market share ranking of HMDA loan originations was weaker than their deposit market share ranking.

According to 2020 peer small business data, ONB had a 7.3 percent market share of small business loan originations. The bank's market share of small business loan originations was well below their deposit market share. The bank's market share of small business loan originations ranked fifth out of 53 small business lenders in the AA. The bank's market share ranking of small business loan originations was in the top 9.4 percent of all small business lenders in the AA. The bank's market share ranking of small business loan originations was stronger than their deposit market share ranking.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AA.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects a good distribution.

Refer to Table O 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 proportion of loans in low-income geographies exceeded the percentage of owner-occupied housing and the aggregate industry distribution of loans to those geographies. The proportion of loans in moderate-income geographies was significantly below the percentage of owner-occupied housing and exceeded the aggregate industry distribution of loans to those geographies.

Small Loans to Businesses

The geographic distribution of small business loans reflects an excellent distribution.

Refer to Table Q 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 proportion of loans in LMI geographies exceeded the percentage of businesses and the aggregate industry distributions of loans to those geographies.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed the bank's lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

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

Refer to Table P 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 proportion of loans to low-income borrowers was well below the percentage of families and is near to the aggregate distribution of loans to those borrowers. The proportion of loans to moderate-income borrowers exceeded the percentage of families and the aggregate distribution of loans to those borrowers.

Small Loans to Businesses

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

Refer to Table R 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 proportion of loans to businesses with less than \$1 million was significantly below the percentage of businesses and below the aggregate industry distribution of loans to those businesses.

Community Development Lending

The bank has made a relatively high level of CD loans. CD loans had a positive impact on the Lending Test rating

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

Throughout the evaluation period, ONB made four CD loans totaling \$4.0 million in the Danville MSA. CD loans volume was equivalent to 10.4 percent of allocated tier 1 capital. CD loans were responsive to community needs related to the COVID-19 pandemic. The bank's CD loans were all part of the PPP. The bank's loans were working capital to support businesses and their employees during the pandemic.

Product Innovation and Flexibility

The bank makes limited use of, makes little use of innovative and/or flexible lending practices to serve AA credit needs.

Refer to the Other Loan Performance section under the Scope of the Evaluation section for additional details regarding other programs.

INVESTMENT TEST

The bank’s performance under the Investment Test in the state of Illinois is rated Low Satisfactory.

Based on a full-scope review, the bank’s performance in the Danville MSA is adequate.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000’s)	#	\$(000’s)	#	% of Total #	\$(000’s)	% of Total \$	#	\$(000’s)
Danville MSA	0	0	24	494	24	100.0	494	100.0	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.
 ** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Conclusions for Area Receiving a Full-Scope Review

Danville MSA

The bank has an adequate level of qualified CD investment and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits good responsiveness to credit and community economic development needs. The bank does not use innovative and/or complex investments to support CD initiatives.

ONB had 24 qualified CD investments and donations totaling \$494,200, which is equivalent to 1.3 percent of allocated tier 1 capital. The bank made six current period CD investments, which totaled \$436,475, and 18 qualified grants totaling \$57,800. The bank had no unfunded commitments. The bank’s CD investments were responsive to affordable housing needs and community services to LMI communities in the AA. The investments consisted of \$436,475 in MBS. The bank complemented its investments with \$7,500 of in-kind contributions in the form of several computers and equipment to a nonprofit organization.

SERVICE TEST

The bank’s performance under the Service Test in state of Illinois is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Danville MSA is good.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the bank’s AA.

Distribution of Branch Delivery System											
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	Low	Mod	Mid	Upp
Danville MSA	100.0	2	100.0	0.0	50.0	0.0	50.0	4.3	18.6	47.2	29.9

During the pandemic, the bank offered additional services such as curbside banking, cashing stimulus checks for non-customers, and offering leniency on waiving non-sufficient funds and overdraft fees and early withdrawal penalties. With lobby closures, branch personnel worked to help meet community banking needs through drive-through facilities and digital banking services. The bank received positive consideration for these activities in response to the pandemic.

Danville MSA

The bank has two branches in the AA, with none in a low-income CTs and one in a moderate-income CT. The percentage of the branch located in LMI areas exceeds the percentage of the population residing in the geographies. The bank did not open or close branches during the evaluation period.

The bank complements its traditional service delivery methods in the AA with certain alternative retail delivery systems, such as bill payment, deposit-taking ATMs, debit card, direct deposit, mobile banking, online banking, remote deposit service, and telephone banking.

ONB has two ATMs in the AA, of which one is a deposit-taking ATM in a moderate-income CT of the AA. We did not place significant weight on alternative delivery systems, as the bank did not maintain or provide metrics to determine their effectiveness in helping meet the needs of LMI individuals.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. All branches operate during similar banking hours.

Community Development Services

The bank provides an adequate level of CD services.

Danville MSA

CD services were effective and responsive in addressing the community’s needs. During the evaluation period, four bank employees from various lines of business partnered with organizations and contributed a total of 91 hours supporting LMI individuals and families. This included serving on the board of an organization that promotes affordable housing within the AA.

State of Indiana

CRA rating for the State of Indiana⁵: 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 reflect excellent responsiveness to credit needs in the state of Indiana.
- The bank exhibits an adequate geographic and borrower distribution of loans in its AAs.
- The bank is a leader in making CD loans in the Indianapolis CSA. CD loans had a significantly positive impact on the Lending Test rating.
- The bank has a significant level of qualified investments.
- The bank's service delivery systems are reasonably accessible to geographies and individuals of different income levels in its AAs.
- The bank is a leader in providing CD services.

Description of Institution's Operations in the State of Indiana

ONB has 13 AAs within the state of Indiana. For purposes of this evaluation, the 13 AAs were combined and presented as the six AAs which are the Bloomington-Bedford CSA (Bloomington CSA), Fort Wayne MSA, Indianapolis-Carmel-Muncie CSA (Indianapolis CSA), Lafayette-West Lafayette MSA (Lafayette MSA), Terre Haute MSA, and Indiana non-MSA. The bank delineated non-MSA AAs within the same state are combined and evaluated as the Indiana non-MSA. In 2019, the bank closed a branch in the Parke County within the Terre Haute MSA which resulted in ONB exiting the county.

Refer to Appendix A, Scope of Examination, for a list of counties within each AA. The AA complies with the regulation and does not arbitrarily exclude any LMI areas.

The state of Indiana represents the largest rated area by deposits. ONB has \$6.6 billion in deposits representing 33.5 percent of the total bank deposits. ONB operates 60 branches within the state representing 37.0 percent of the total number of bank branches. The bank made 34.6 percent of its loan originations and purchases compared to total bank loans during the evaluation period in the state. The bank's primary loan products in the state of Indiana are home mortgages and small business loans.

According to the FDIC deposit market share data, ONB had a 6.1 percent market share making it the fourth largest deposit holder out of 132 financial institutions in the state. The bank operates 60 branches and 64 deposit-taking ATMs within the state.

⁵ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Indianapolis-Carmel-Muncie CSA

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

Table A – Demographic Information of the Assessment Area						
Assessment Area: Indianapolis-Carmel-Muncie CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	411	16.8	28.0	31.6	22.6	1.0
Population by Geography	1,958,387	10.8	24.1	32.6	31.7	0.8
Housing Units by Geography	838,555	12.5	26.2	31.7	29.3	0.4
Owner-Occupied Units by Geography	479,569	6.2	18.8	36.5	38.3	0.1
Occupied Rental Units by Geography	267,587	18.9	36.9	25.6	17.9	0.7
Vacant Units by Geography	91,399	26.1	33.4	24.4	15.4	0.6
Businesses by Geography	225,910	11.0	22.3	30.1	36.3	0.3
Farms by Geography	6,135	6.3	16.0	43.8	33.7	0.1
Family Distribution by Income Level	479,258	22.4	17.4	19.5	40.6	0.0
Household Distribution by Income Level	747,156	24.4	16.4	17.8	41.4	0.0
Median Family Income MSA - 18020 Columbus, IN MSA		\$66,425	Median Housing Value			\$136,625
Median Family Income MSA - 26900 Indianapolis-Carmel-Anderson, IN MSA		\$66,803	Median Gross Rent			\$817
Median Family Income MSA - 34620 Muncie, IN MSA		\$51,935	Families Below Poverty Level			11.3%
Median Family Income IN Non-MSAs		\$55,715				
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The bank's AA has 411 CTs which includes 69 low-income, 115 moderate-income, 130 middle-income, 93 upper-income, and four NA-income. The AA complies with the regulation and does not arbitrarily exclude any LMI areas.

The bank operates 27 branches and 28 deposit-taking ATMs within the AA.

Housing Characteristics

Conditions in the housing market make it challenging for home buyers as demand exceeds housing supply and prices continue to trend upwards. The lack of affordable housing has made it difficult for LMI families to purchase homes and to rent housing in the AA.

The AA is a high cost housing area, limiting access to affordable home ownership among low-income borrowers. The 2021 FFIEC AMFI in the AA is \$79,700. According to Realtor.com data, the median housing value in the AA is \$239,950 and \$276,250 in January 2019 and December 2021, respectively, reflecting a 15.1 percent increase.

Assuming a 30-year mortgage with a 5 percent interest rate and not accounting for down payment, homeowner’s insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$39,850 per year (or less than 50 percent of the 2021 FFIEC AMFI in the AA) could afford a \$185,583 mortgage with a payment of \$996 per month. A moderate-income borrower making \$63,760 per year (or less than 80 percent of the 2021 FFIEC AMFI in the AA) could afford a \$296,933 mortgage with a payment of \$1,594 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA.

Community Contacts

The OCC made two community contacts in the AA during the evaluation period, which consisted of nonprofit organizations focused on economic development in LMI areas. The community contacts indicated that the following are identified needs within the bank’s AA:

- Home mortgages in LMI areas
- Small loans to small businesses
- Financial education for small business owners

Indiana Non-MSA

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

Table A – Demographic Information of the Assessment Area						
Assessment Area: IN Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	63	0.0	11.1	69.8	19.0	0.0
Population by Geography	259,173	0.0	7.9	69.1	23.0	0.0
Housing Units by Geography	112,476	0.0	8.5	69.5	22.0	0.0
Owner-Occupied Units by Geography	74,833	0.0	6.0	69.1	24.9	0.0
Occupied Rental Units by Geography	25,265	0.0	14.5	69.4	16.1	0.0
Vacant Units by Geography	12,378	0.0	11.7	72.1	16.2	0.0
Businesses by Geography	18,960	0.0	7.9	68.1	24.1	0.0
Farms by Geography	2,194	0.0	1.7	65.9	32.5	0.0
Family Distribution by Income Level	68,461	17.4	17.9	22.4	42.4	0.0
Household Distribution by Income Level	100,098	22.3	16.6	18.8	42.3	0.0
Median Family Income IN Non-MSA		\$55,715	Median Housing Value			\$103,263
			Median Gross Rent			\$609
			Families Below Poverty Level			9.6%

Source: 2015 ACS and 2021 D&B Data
 Due to rounding, totals may not equal 100.0
 (*) The NA category consists of geographies that have not been assigned an income classification.

The bank's AA has 63 CTs, which includes seven moderate-income, 44 middle-income, and 12 upper-income CTs. There are no low-income CTs within the bank's AA. The AA complies with the regulation and does not arbitrarily exclude any LMI areas.

The bank operates 15 branches and 17 deposit-taking ATMs within the AA.

Housing Characteristics

Conditions in the housing market make it challenging for home buyers as demand exceeds housing supply and prices continue to trend upwards. The lack of affordable housing has made it difficult for LMI families to purchase homes and to rent housing in the AA.

The AA is a high cost housing area, limiting access to affordable home ownership among low-income borrowers. The 2021 FFIEC AMFI in the AA is \$64,600. According to Realtor.com data, the median housing value in the AA is \$126,269 and \$176,100 in January 2019 and December 2021, respectively, reflecting a 39.5 percent increase.

Assuming a 30-year mortgage with a 5 percent interest rate and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$32,300 per year (or less than 50 percent of the 2021 FFIEC AMFI in the AA) could afford a \$150,422 mortgage with a payment of \$808 per month. A moderate-income borrower making \$51,680 per year (or less than 80 percent of the 2021 FFIEC AMFI in the AA) could afford a \$240,676 mortgage with a payment of \$1,292 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA.

Community Contacts

The OCC made four community contacts in the AA during the evaluation period, which consisted of nonprofit organizations focused on neighborhood revitalization and economic development in LMI areas. The community contacts indicated that the following are identified needs within the bank's AA:

- Loans for used automobiles
- Home mortgages in LMI areas
- Small loans to small businesses, specifically start-ups
- Small loans to farms for operating funds and to purchase equipment
- Funding to redevelopment projects
- Funding support to nonprofits

Scope of Evaluation in the State of Indiana

For the state of Indiana, the Indianapolis CSA and Indiana non-MSA received full-scope reviews. The combined Indianapolis CSA and Indiana non-MSA represent 64.7 percent of total bank deposits, 70 percent of total bank branches, and 65.1 percent of loan originations and purchases within the rating area. The Bloomington CSA, Fort Wayne MSA, Lafayette MSA, and Terre Haute MSA received limited-scope reviews.

For the Lending Test, more weight was given to home mortgage lending, due to the fact it consisted of the majority of loan originations.

In the Indiana non-MSA, there were no low-income CTs, therefore ratings are determined based on performance in moderate-income CTs. Borrower distribution of home mortgage loans was given greater weight to the aggregate performance for low-income borrowers due to the levels of poverty in the AA. For small farm loans, greater weight was given to the Indiana non-MSA due to the 93.6 percent of small farm loan originations in the AA.

Due to the branch closure in the Terre Haute MSA, the AA was evaluated differently. In evaluating the geographic distribution and borrower income criteria under the Lending Test for HMDA and CRA, data was analyzed over two analysis periods, 2019 and 2020 through 2021 due to changes to the AA. In evaluating the bank’s performance under the Lending Test, we placed greater weight on the 2020 through 2021 analysis period than 2019 as it represents the more recent production within the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF INDIANA

LENDING TEST

The bank’s performance under the Lending Test in the state of Indiana is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Indianapolis CSA and Indiana non-MSA is good.

Lending Activity

Lending levels reflect excellent responsiveness to credit needs in the state of Indiana.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Bloomington CSA	1,144	296	12	19	1,471	11.0	15.2
Fort Wayne MSA	602	227	2	15	846	6.3	7.0
Indianapolis CSA	4,144	1,336	69	80	5,629	41.9	39.3
Lafayette MSA	768	153	6	11	938	7.0	4.8
Terre Haute MSA	824	535	18	6	1,383	10.3	8.3
IN Non-MSA	1,531	474	1,005	10	3,020	22.5	25.3
Statewide	--	--	--	141	141	1.1	--

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.
 "--" data not available.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Bloomington CSA	222,176	91,273	2,105	19,894	335,448	10.8	15.2
Fort Wayne MSA	126,595	121,632	412	31,803	280,442	9.0	7.0
Indianapolis CSA	811,451	462,894	8,469	137,887	1,420,701	45.7	39.3
Lafayette MSA	125,196	54,522	949	2,028	182,695	5.9	4.8
Terre Haute MSA	96,954	64,579	1,408	9,427	172,368	5.5	8.3
IN Non-MSA	191,202	139,300	111,608	37,488	479,598	15.4	25.3
Statewide	--	--	--	238,527	238,527	7.7	--

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.
"--" data not available.

Indianapolis CSA

Lending levels reflect excellent responsiveness to AA credit needs.

According to FDIC Deposit Market Share data, ONB had \$2.6 billion in deposits in the Indianapolis CSA. ONB had a 3.1 percent deposit market share in the AA. ONB's deposit market share ranked 12th out of 47 deposit-taking institutions in the AA. The bank's deposit market share ranking was in the top 25.5 percent of all deposit-taking institutions in the AA.

According to 2021 peer HMDA data, ONB had a 1.2 percent market share of HMDA loan originations in the Indianapolis CSA. The bank's market share of HMDA loan originations was well below their deposit market share. The bank's market share of HMDA loan originations ranked 24th out of 683 HMDA lenders in the AA. The bank market share ranking of HMDA loan originations was in the top 3.5 percent of all HMDA lenders in the AA. The bank's market share ranking of HMDA loan originations was stronger than their deposit market share ranking.

According to 2020 peer small business data, ONB had a 4.1 percent market share of small business loan originations in the Indianapolis CSA. The bank's market share of small business loan originations was stronger their deposit market share. The bank's market share of small business loan originations ranked fifth out of 220 small business lenders in the AA. The banks market share of small business loan originations ranked in the top 2.3 percent of all small business lenders in the AA. The bank's market share ranking of small business loan originations was stronger than their deposit market share ranking.

According to 2020 peer small business data, ONB had a 2.4 percent market share of small farm loan originations. The bank's market share of small farm loan originations was below their deposit market share. The bank's market share of small farm loan originations ranked 12 out of 36 small lenders in the AA. The bank's market share ranking of small farm loan originations ranked in the top 33.3 percent of all small farm lenders in the AA. The bank's market share ranking of small farm loan originations was below their deposit market share ranking.

Indiana Non-MSA

Lending levels reflect excellent responsiveness to AA credit needs.

According to FDIC Deposit Market Share data, ONB had \$1.7 billion in deposits in the Indiana Non-MSA. The bank had a 24.6 percent deposit market share in the AA. The bank's deposit market share

ranked second out of 26 deposit-taking institutions in the AA. The bank's deposit market share ranked in the top 7.7 percent of all deposit-taking institutions in the AA.

According to 2021 peer HMDA data, ONB had a 5.9 percent market share of HMDA loan originations in the Indiana Non-MSA. The bank's market share of HMDA loan originations was well below their deposit market share in the AA. The bank's market share ranked fourth out of 288 HMDA lenders in the AA. The bank's market share of HMDA loan originations ranked in the top 1.4 percent of all HMDA lenders in the AA. The bank's market share ranking of HMDA loan originations was stronger than their deposit market share ranking in the AA.

According to 2020 peer small business data, ONB had a 17.2 percent market share of small business loan originations. The bank's market share of small business loan originations was below their deposit market share in the Indiana Non-MSA.

The bank's market share of small business loan originations ranked second out of 90 small business lenders in the AA. The bank's market share ranking of small business loan originations ranked in the top 2.2 percent of all small business lenders in the AA. The bank's market share ranking of small business loan originations was stronger than their deposit market share ranking in the AA.

According to 2020 peer small business data, ONB had a 26 percent market share of small farm loan originations. The bank's market share of small farm loan originations was stronger than their deposit market share. The bank's market share of small farm loan originations ranked second out of 28 small lenders in the AA. The bank's market share ranking of small farm loan originations ranked in the top 7.1 percent of all small farm lenders in the AA. The bank's market share ranking of small farm loan originations was stronger than their deposit market share ranking.

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in its AAs.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects a poor distribution.

Refer to Table O 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.

Indianapolis CSA

The geographic distribution of home mortgage loans is poor. The proportion of loans in low-income geographies is significantly below the percentage of owner-occupied housing and well below the aggregate industry distribution of loans to those geographies. The proportion of loans to moderate-income geographies is well below the percentage of owner-occupied housing and below the aggregate industry distribution of loans to those geographies.

Indiana Non-MSA

The geographic distribution of home mortgage loans is poor. The proportion of loans in moderate-income geographies is well below the percentage of owner-occupied housing and the aggregate industry distribution of loans to those geographies.

Small Loans to Businesses

The geographic distribution of small business loans reflects a good distribution.

Refer to Table Q 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.

Indianapolis CSA

The geographic distribution of small business loans is good. The proportion of loans in low-income geographies was below the percentage of businesses and exceeded the aggregate industry distribution of loans to those geographies. The proportion of loans in moderate-income geographies was near to the percentage of businesses and exceeded the aggregate industry distribution of loans to those geographies.

Indiana Non-MSA

The geographic distribution of small business loans is poor. The proportion of loans in moderate-income geographies was significantly below the proportion of businesses and well below the aggregate industry distribution of loans to those geographies.

Small Loans to Farms

The geographic distribution of small farm loans reflects a good distribution.

Refer to Table S 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 farms.

Indianapolis CSA

The geographic distribution of small farm loans is adequate. The proportion of loans in low-income geographies was significantly below the percentage of farms and the aggregate industry distribution of loans to those geographies. The proportion of loans in moderate-income geographies was significantly below the percentage of loans and exceeded the aggregate industry distribution of loans to those geographies.

Indiana Non-MSA

The geographic distribution of small farm loans is good. The proportion of loans in moderate-income geographies was well below the percentage of farms and exceeded the aggregate industry distribution of loans to those geographies.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed the bank's lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels and business and farms of different sizes given the product lines offered by the bank.

Home Mortgage Loans

The distribution of home mortgage loans among individuals of different income levels is adequate.

Refer to Table P 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.

Indianapolis CSA

The demographic distribution of mortgage loans is adequate. The proportion of loans to low-income borrowers was well below the percentage of families and below the aggregate distribution of loans to those borrowers. The proportion of loans to moderate-income borrowers was somewhat near the percentage of families and below the aggregate industry distribution of loans to those borrowers.

Indiana Non-MSA

The demographic distribution of mortgage loans is excellent. The proportion of loans to low-income borrowers was below the percentage of families and exceeded the aggregate industry distribution of loans to those borrowers. The proportion of loans to moderate-income borrowers exceeded the percentage of families and was near the aggregate industry distribution of loans to those businesses.

Small Loans to Businesses

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

Refer to Table R 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.

Indianapolis CSA

The distribution of loans to businesses of different sizes is adequate. The proportion of bank loans to businesses with revenues less than \$1 million was significantly below the percentage of businesses and below the aggregate industry distribution of loans to those businesses.

Indiana Non-MSA

The distribution of loans to businesses of different sizes is good. The proportion of bank loans to businesses with revenues less than \$1 million was significantly below the percentage of businesses and exceeded the aggregate industry distribution of loans to those businesses.

Small Loans to Farms

The distribution of loans to farms of different sizes is excellent.

Refer to Table T in the state of Indiana 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.

Indianapolis CSA

The distribution of loans to farms of different sizes is excellent. The distribution of loans to farms with revenues less than \$500,000 was below the percentage of farms and exceeded the aggregate industry distribution of loans to those borrowers.

Indiana Non-MSA

The distribution of loans to farms of different sizes is excellent. The distribution of loans to farms with revenues less than \$500,000 was well below the percentage of farms and exceeded the aggregate industry distribution of loans to those borrowers.

Community Development Lending

The bank is a leader in making CD loans. CD loans had a significantly positive impact on the Lending Test rating.

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

Indianapolis CSA

The bank is a leader in making CD loans in the Indianapolis CSA. CD loans had a significantly positive impact on the Lending Test rating. Throughout the evaluation period, ONB made 80 CD loans totaling \$137.9 million within the AA. CD loan volume was equivalent to 51.3 percent of allocated tier 1 capital. The bank's CD loans were responsive to revitalization and stabilization due to the COVID-19 pandemic. Additionally, the bank's loans were responsive to economic development needs.

The following are examples of responsive CD loans:

- \$23.7 million loan for the construction of a building to be used for government services. The project is located within an opportunity zone located in a low-income CT.
- \$5.5 million loan dedicated for community service. The proceeds from the loan were used to finance ongoing operation of a women and children's shelter that provides its services primarily

to LMI individuals. The shelter provides services for homeless and offers job training as part of the mission.

- \$1.2 million loan that supported economic development. The loan proceeds were for an SBA 504 loan and were used to develop a property that will provide storage facilities within the AA. The project will create several jobs for LMI individuals.

Indiana Non-MSA

The bank made a relatively high level of CD loans in the Indiana Non-MSA. CD loans had a positive impact on the Lending Test rating. Throughout the evaluation period, ONB made 11 CD loans, totaling \$9.5 million in the Indiana Non-MSA.

The volume of CD loans was equivalent to 5.5 percent of allocated tier 1 capital. The bank's loans were responsive affordable housing and to community needs related to the COVID-19 pandemic. CD loans exhibited some complexity.

Examples of CD loans the bank made in the AA include:

- \$9 million loan that supported affordable housing in the AA. The project is funded through a program with the USDA that supports affordable housing for low-income senior citizens and disabled individuals. The project will provide 92 units of housing below HUD's LMI rent thresholds and is in a moderate-income CT.
- Nine PPP loans to nonprofit organizations in the AA totaling \$427,000. The loans were responsive to community needs that were present due to the pandemic. All these loans supported revitalization and stabilization efforts in the AA.

Statewide

The bank made 10 CD loans in the statewide area totaling \$37.5 million. Statewide CD loans were responsive economic development, affordable housing, and revitalization and stabilization. Statewide CD loans had a positive impact on the Lending Test rating.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices to serve AA credit needs.

Refer to the Other Loan Performance section under the Scope of the Evaluation section for additional details regarding other programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Bloomington MSA, Fort Wayne MSA, Lafayette MSA, and Terre Haute MSA are consistent with the bank's overall performance under the Lending Test in the full-scope areas. Limited-scope AAs had a neutral impact on the Lending Test rating.

Refer to Tables O through T in the state of Indiana section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Indiana is rated Outstanding.

Based on a full-scope review, the bank's performance in the Indianapolis CSA is excellent and Indiana non-MSA is adequate.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Bloomington CSA	5	232	99	12,809	104	12.7	13,041	6.4	0	0
Fort Wayne MSA	35	15,692	105	18,866	140	17.1	34,557	16.9	0	0
Indianapolis CSA	100	32,537	271	89,997	371	45.2	122,534	60.0	0	0
Lafayette MSA	4	227	10	13,518	14	1.7	13,745	6.7	0	0
Terre Haute MSA	1	17	65	8,545	66	8.0	8,562	4.2	0	0
IN Non-MSA	3	8,541	103	2,167	106	12.9	10,709	5.2	0	0
Statewide	3	362	17	619	20	2.4	981	0.5	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.
 ** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Conclusions for Area Receiving a Full-Scope Review

Indianapolis CSA

The bank has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits excellent responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

ONB had 371 qualified CD investments and donations totaling \$122.5 million, which is equivalent to 45.6 percent of allocated tier 1 capital. The bank made 79 current period CD investments, which totaled \$87.7 million, and 192 qualified grants totaling \$2.3 million. Additionally, the AA benefitted from the ongoing impact of 100 prior period CD investments with an outstanding balance of \$32.5 million. The bank had no unfunded commitments. The bank's CD investments were responsive to affordable housing needs and community services to LMI communities in the AA.

The investments consisted of \$51.4 million in MBS, \$15 million in school bonds, and \$6.8 million in New Market Tax Credits.

The bank complemented its investments with in-kind contributions:

- \$14,000 in several computers and equipment to two nonprofit organizations in the AA.
- \$8,808 in leased commercial space to a nonprofit organization, which serves as their headquarters and operations center. The mission of the organization is to create a downtown environment that results in sustainable economic and cultural growth.

Indiana Non-MSA

The bank has an excellent level of qualified CD investment and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits adequate responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

ONB had five qualified CD investments and donations totaling \$10.7 million, which is equivalent to 6.2 percent of allocated tier 1 capital. The bank made 11 current period CD investments, which totaled \$1.3 million, and 92 qualified grants totaling \$688,295. Additionally, the AA benefitted from the ongoing impact of three prior period CD investments with an outstanding balance of \$8.5 million. The bank had no unfunded commitments. The bank's CD investments were responsive to affordable housing needs and community services to LMI communities in the AA. The investments consisted of \$1.3 million in MBS.

The bank complemented its investments with in-kind contributions:

- \$92,155 in leased commercial space to four different nonprofit organizations, which serves as their headquarters and operations centers.
- \$1,285 in furniture to a nonprofit organization for their administrative offices. The mission of the organization is to mobilize funds, materials, and volunteer labor to construct houses in partnership with low-income families. These houses are sold to partner families at no profit.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Bloomington CSA, Fort Wayne MSA, Lafayette MSA, Terre Haute MSA, and Indiana non-MSA are consistent with the bank's overall performance under the Investment Test in the full-scope areas.

SERVICE TEST

The bank's performance under the Service Test in the state of Indiana is rated Low Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Indianapolis CSA is adequate and Indiana non-MSA is excellent.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
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	Low	Mod	Mid	Upp
Bloomington-Bedford CSA	15.2	6	10.0	0.0	50.0	33.3	16.7	7.3	16.9	47.7	24.6
Fort Wayne MSA	7.0	4	6.7	0.0	0.0	25.0	50.0	10.6	19.4	38.8	30.5
Indianapolis CSA	39.3	27	45.0	0.0	25.9	22.2	51.9	10.8	24.1	32.6	31.7
Lafayette-West Lafayette MSA	4.8	3	5.0	0.0	66.7	0.0	33.3	6.1	18.7	31.0	35.1
Terre Haute MSA	8.3	5	8.3	0.0	20.0	60.0	20.0	6.8	22.3	35.9	35.1
IN Non-MSA	25.3	15	25.0	0.0	13.3	66.7	20.0	0.0	7.9	69.1	23.0

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Bloomington-Bedford CSA	0	0	0	0	0	0
Fort Wayne MSA	0	1	0	0	-1	0
Indianapolis CSA	1	4	0	-2	-1	0
Lafayette-West Lafayette MSA	0	1	0	0	0	-1
Terre Haute MSA	0	1	0	0	-1	0
IN Non-MSA	0	1	0	0	-1	0

During the pandemic, the bank offered additional services such as curbside banking, cashing stimulus checks for non-customers, and offering leniency on waiving non-sufficient funds and overdraft fees and early withdrawal penalties. With lobby closures, branch personnel worked to help meet community banking needs through drive-through facilities and digital banking services. The bank received positive consideration for these activities in response to the pandemic.

Indianapolis CSA

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank's AA.

The bank has 27 branches in the AA, with none in low-income CTs and seven in moderate-income CTs. The percentage of the branch located in LMI areas is below the percentage of the population residing in the geographies.

To the extent changes have been made, the bank's opening and closing of branches has adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. In March 2019, the bank opened a branch in an upper-income CT. In April 2020, the bank closed two branches in moderate-income CTs, a branch in a middle-income CT, and a branch in an upper-income CT.

The bank complements its traditional service delivery methods in the AA with certain alternative retail delivery systems, such as bill payment, deposit-taking ATMs, debit card, direct deposit, mobile banking, online banking, remote deposit service, and telephone banking.

ONB has 28 ATMs in the AA, of which seven deposit-taking ATMs in LMI CTs of the AA. We did not place significant weight on alternative delivery systems, as the bank did not maintain or provide metrics to determine their effectiveness in helping meet the needs of LMI individuals.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. All branches operate during similar banking hours.

Indiana Non-MSA

Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's AA.

The bank has 15 branches in the AA, with two in moderate-income CTs. There are no low-income CTs in the AA. The percentage of branches located in LMI areas exceeds the percentage of the population residing in the geographies. The bank did not open branches during the evaluation period. In April 2020, the bank closed a branch in a middle-income CT.

To the extent changes have been made, the bank's closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.

The bank complements its traditional service delivery methods in the AA with certain alternative retail delivery systems, such as bill payment, deposit-taking ATMs, debit card, direct deposit, mobile banking, online banking, remote deposit service, and telephone banking.

ONB has 17 ATMs in the AA, of which two deposit-taking ATMs are in moderate-income CTs. We did not place significant weight on alternative delivery systems, as the bank did not maintain or provide metrics to determine their effectiveness in helping meet the needs of LMI individuals.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. All branches operate during similar banking hours.

Community Development Services

The bank is a leader in providing CD services.

Indianapolis CSA

The bank is a leader in providing CD services.

CD services were effective and responsive in addressing the community's needs. During the evaluation period, 99 bank employees from various lines of business partnered with 99 organizations and contributed a total of 3,235 hours supporting LMI individuals and families. This included serving on committees and boards for 60 various organizations that promote affordable housing, community services, and economic developments for LMI CTs within the AA.

The following are examples of CD services provided in this AA:

- Three employees provided 181 hours as a board member, committee member, or grant reviewer to a group supporting small businesses. The group provides leadership and value to members by promoting an environment where businesses, organizations, and communities can position themselves for success and further enhance the quality of life within the AA.
- Ten employees provided 338 hours as a board member, committee member, or grant reviewer to seven different groups supporting small businesses. The groups provide leadership and value to members by promoting an environment where businesses, organizations, and communities can position themselves for success and further enhance the quality of life within the AA.
- An employee provided 89 hours as a board member to a Small Business Development Center (SBDC), which creates a positive and measurable impact on the formation, growth, and sustainability of Indiana's small businesses by providing entrepreneurs expert guidance and a comprehensive network of resources.

Indiana Non-MSA

The bank is a leader in providing CD services.

CD services were effective and responsive in addressing the community's needs. During the evaluation period, 64 bank employees from various lines of business partnered with 77 organizations and contributed a total of 2,219 hours supporting LMI individuals and families. This included serving on committees and boards for 45 various organizations that promote affordable housing, community services, and economic developments for LMI CTs within the AA.

Refer to the Other Performance section under the Scope of the Evaluation section for additional details regarding the bank's CD services.

The following are examples of CD services provided in this AA:

- 12 employees provided 171 hours to five organizations that are charter members of a national organization. The national organization's mission is to improve the lives of LMI individuals or

families by mobilizing programs and services through various nonprofit partners. Employees served on boards, committees, or provided fundraising support.

- A bank employee provided 107 hours of board and committee support to a county development corporation. The board determined the strategic plan for the agency that provides leadership, advocacy, marketing, community planning, and development to raise the income of residents, retain and expand existing firms, and attract new businesses.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Bloomington CSA, Lafayette MSA, and Terre Haute MSA are consistent with the bank's overall performance under the Service Test in the full-scope areas. Fort Wayne MSA is weaker than the bank's overall performance under the Service Test in the full-scope area. The weaker performance is based on the branch distribution in LMI CTs. The weaker performance did not have an impact on the bank's overall Service Test performance rating for the state.

State of Kentucky

CRA rating for the State of Kentucky⁶: Satisfactory

The Lending Test is rated:	Low Satisfactory
The Investment Test is rated:	Low Satisfactory
The Service Test is rated:	Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs.
- The bank exhibits very poor geographical distribution of loans and good borrower distribution.
- The bank makes extensive use of flexible loan products. The bank's use of flexible loan products had a positive impact on the Lending Test rating.
- The bank's service delivery systems are readily accessible to geographies and individuals of different income levels in its AAs.
- The bank provides a significant level of CD services.

Description of Institution's Operations in the State of Kentucky

ONB has three AAs within the state of Kentucky which are the Owensboro MSA, Kentucky non-MSA, and Lexington-Fayette MSA (Lexington MSA). The bank delineated non-MSA AAs within the same state are combined and evaluated as the Kentucky non-MSA.

Refer to Appendix A, Scope of Examination, for a list of counties within each AA. The AA complies with the regulation and does not arbitrarily exclude any LMI areas.

The state of Kentucky represents a small area by deposits. ONB has \$656.9 million in deposits representing 3.4 percent of the total bank deposits. ONB operates eight branches within the state representing 4.9 percent of total number of bank branches. The bank made 4.7 percent of its loan originations and purchases compared to total bank loans during the evaluation period in the state. The bank's primary loan products in the state of Kentucky are home mortgages and small business loans.

According to the FDIC deposit market share data, ONB had a 0.9 percent market share making it the 23rd largest deposit holder out of 158 financial institutions in the state. The bank operates eight branches and eight deposit-taking ATMs within the state.

Kentucky Non-MSA

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

⁶ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: KY Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	25	0.0	4.0	72.0	24.0	0.0
Population by Geography	92,965	0.0	3.8	67.8	28.4	0.0
Housing Units by Geography	41,105	0.0	3.8	68.0	28.2	0.0
Owner-Occupied Units by Geography	26,512	0.0	2.4	68.3	29.3	0.0
Occupied Rental Units by Geography	9,211	0.0	7.9	63.1	29.0	0.0
Vacant Units by Geography	5,382	0.0	3.4	74.7	21.8	0.0
Businesses by Geography	5,465	0.0	5.9	60.7	33.4	0.0
Farms by Geography	393	0.0	1.8	68.4	29.8	0.0
Family Distribution by Income Level	24,716	19.0	14.2	19.9	47.0	0.0
Household Distribution by Income Level	35,723	21.8	14.9	15.7	47.6	0.0
Median Family Income KY Non-MSA		\$45,986	Median Housing Value			\$86,517
			Median Gross Rent			\$559
			Families Below Poverty Level			14.3%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The bank's AA has 25 CTs, which includes one moderate-income, 18 middle-income, and six upper-income CTs. There are no low-income CTs within the bank's AA. The AA complies with the regulation and does not arbitrarily exclude any LMI areas.

The bank operates four branches and four deposit-taking ATMs within the AA.

Housing Characteristics

Conditions in the housing market make it challenging for home buyers as demand exceeds housing supply and prices continue to trend upwards. The lack of affordable housing has made it difficult for LMI families to purchase homes and to rent housing in the AA.

The AA is a high cost housing area, limiting access to affordable home ownership among low-income borrowers. The 2021 FFIEC AMFI in the AA is \$52,600. According to Realtor.com data, the median housing value in the AA is \$219,700 and \$284,062 in January 2019 and December 2021, respectively, reflecting a 4.2 percent increase.

Assuming a 30-year mortgage with a five percent interest rate and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$26,300 per year (or less than 50 percent of the 2021 FFIEC AMFI in the AA) could afford a \$122,480 mortgage with a payment of \$658 per month. A moderate-income borrower making \$42,080 per year (or less than 80 percent of the 2021 FFIEC AMFI in the AA) could afford a \$195,968 mortgage with a payment of \$1,052 per month. This illustrates that LMI borrowers would not be challenged to qualify for a mortgage loan in the AA.

Community Contacts

The OCC made a community contact in the AA during the evaluation period of a county agency focused on economic development in LMI areas. The community contacts indicated that the following are identified needs within the bank's AA:

- Home mortgages for veterans
- Small loans to small businesses
- Financial education to LMI individuals

Scope of Evaluation in the State of Kentucky

For the state of Kentucky, the Kentucky non-MSA received a full-scope review. The Kentucky non-MSA represents 71.1 percent of total bank deposits, 50.0 percent of total bank branches, 41.4 percent of loan originations and purchases within the rating area. The Owensboro MSA and Lexington MSA received limited-scope reviews.

In the Kentucky non-MSA, there were no low-income CTs; therefore, ratings are determined based on performance in moderate-income CTs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF KENTUCKY

LENDING TEST

The bank's performance under the Lending Test in the state of Kentucky is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Kentucky non-MSA is adequate.

Lending Activity

Lending levels reflect excellent responsiveness to credit needs in the state of Kentucky.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Lexington MSA	267	133	2	2	404	16.1	10.0
Owensboro MSA	653	382	18	9	1,062	42.4	18.9
KY Non-MSA	600	330	99	8	1,037	41.4	71.1
Statewide	--	--	--	1	1	0.0	-

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.
"--" data not available.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Lexington MSA	89,650	20,082	42	6,730	116,504	30.2	10.0
Owensboro MSA	106,490	41,799	1,007	10,148	159,444	41.3	18.9
KY Non-MSA	57,819	38,008	10,560	2,705	109,092	28.3	71.1
Statewide	--	--	--	1,022	1,022	0.0	--

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.
"--" data not available.

According to FDIC Deposit Market Share data, ONB had \$467.1 million in deposits in the Kentucky non-MSA. The bank had a 22.4 percent deposit market share in the AA. The bank deposit market share ranked first out of 13 deposit-taking institutions in the AA. The bank deposit market share ranked in the top 7.7 percent of all deposit-taking institutions in the AA.

According to 2021 peer HMDA data, ONB had a 7.9 percent market share of HMDA loan originations in the Kentucky non-MSA. The bank's market share of HMDA loan originations was below their deposit market share in the AA. The bank HMDA loan origination market share ranked second out of 170 HMDA lenders in the AA. The bank's market share ranking of HMDA loan originations ranked in the top 1.2 percent of all HMDA lenders in the AA. The bank's HMDA loan origination market share ranking was stronger than their deposit market share ranking.

According to 2020 peer small business data, ONB 16.2 percent market share of small business loan originations. The bank's market share of small business loan originations was below their deposit market share in the Kentucky non-MSA. The bank's market share of small business loan originations ranked second out of 61 small business lenders in the AA. The bank's market share ranking of small business loan originations was in the top 3.3 percent in the AA. The bank's market share ranking of small business loan originations was stronger than their deposit market share ranking.

Distribution of Loans by Income Level of the Geography

The bank exhibits a very poor geographic distribution of loans in its AAs.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects a very poor distribution.

Refer to Table O 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.

Kentucky Non-MSA

The geographic distribution of home mortgage loans is very poor. The proportion of loans in moderate-income geographies is significantly below the percentage of owner-occupied housing and the aggregate industry distribution of loans to those geographies.

Small Loans to Businesses

The geographic distribution of small business loans reflects a very poor distribution.

Refer to Table Q 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.

Kentucky Non-MSA

The geographical distribution of small business loans is very poor. The proportion of loans in moderate-income geographies was significantly below the percentage of businesses and the aggregate industry distribution of loans to those geographies.

Small Loans to Farms

The geographic distribution of small farm loans reflects very poor distribution.

Refer to Table S 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 farms.

Kentucky Non-MSA

The geographical distribution of small farm loans is very poor. The proportion of loans in moderate-income geographies was significantly below the percentage of small farms and the aggregate industry distribution of loans to those geographies.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed the bank's lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits good distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the bank. More weight was given towards home mortgage loans because they were the majority of loans

Home Mortgage Loans

The distribution of home mortgage loans among individuals of different income levels is excellent.

Refer to Table P 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 proportion of loans to low-income borrowers was well below the percentage of families and exceeded the aggregate distribution of loans to those borrowers. The proportion of loans to moderate-income borrowers exceeded the percentage of families and the aggregate distribution of loans to those borrowers.

Small Loans to Businesses

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

Refer to Table R 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 proportion of bank loans to businesses with revenues less than \$1.0 million was significantly below the percentage of businesses and somewhat near to the aggregate industry distribution of loans to those businesses.

Small Loans to Farms

The distribution of loans to farms of different sizes is good.

Refer to Table T in the state of Kentucky 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 proportion of bank loans to farms with revenues of less than \$500,000 was well below the percentage of farms and near the aggregate industry distribution of loans to those businesses.

Community Development Lending

The bank has made an adequate level of CD loans. CD loans had a neutral impact on the Lending Test rating in Kentucky.

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

Throughout the evaluation period the bank originated eight CD loans totaling \$2.7 million. CD loan volume was equivalent to 5.6 percent of allocated tier 1 capital. CD loans were responsive to revitalize and stabilize the AA. CD loans were not complex.

Examples of CD loans the bank made in the AA include:

- \$1.5 million loan in December of 2020 to a small business located in a distressed underserved middle-income CT. The loans proceeds supported working capital.
- Six PPP loans to nonprofits. The loans totaled \$1.2 million and were responsive to community needs resulting from the pandemic.

Product Innovation and Flexibility

The bank makes extensive use of flexible lending practices in order to serve AA credit needs.

Refer to the Other Loan Performance section under the Scope of the Evaluation section for additional details regarding other programs.

Kentucky Housing Corporation (KHC) Mortgage Loans

KHC offers a variety of loan programs insured by the FHA, Rural Housing Services (RHS), or VA loan programs that include a low (or no) down payment requirement. Several loans offer no monthly mortgage insurance payments. Credit underwriting is flexible by accepting non-traditional forms of credit, and no credit score is required. Over the course of the evaluation period, ONB originated 41 of these loans totaling \$4.6 million within the bank’s AA. The following is a breakdown of the loans by rating area:

- 28 loans totaling \$3.1 million in the state of Kentucky
- 10 loans totaling \$1.1 million in the Evansville IN-KY MMSA
- 3 loan totaling \$381,200 in the Louisville KY-IN MMSA

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s performance under the Lending Test in the Lexington MSA And Owensboro MSA are consistent with the bank’s overall performance under the Lending Test in the full-scope areas. Limited-scope AAs had a neutral impact on the Lending Test rating.

Refer to Tables O through T in the state of Indiana section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank’s performance under the Investment Test in state of Kentucky is rated Low Satisfactory.

Based on a full-scope review, the bank’s performance in the Kentucky non-MSA is poor. The performance of the limit-scope AAs had a significantly positive impact on the bank’s overall performance rating for the state.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000’s)	#	\$(000’s)	#	% of Total #	\$(000’s)	% of Total \$	#	\$(000’s)
KY Non-MSA	0	0	39	634	39	36.4	634	8.4	0	0
Owensboro MSA	7	4,337	28	105	35	32.7	4,442	59.0	0	0
Lexington MSA	8	353	25	2,096	33	30.8	2,448	32.5	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.
 ** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Conclusions for Area Receiving a Full-Scope Review

Kentucky Non-MSA

The bank has an adequate level of qualified CD investment and grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits adequate responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

ONB had 39 qualified CD investments and donations totaling \$634,753, which is equivalent to 1.3 percent of allocated tier 1 capital. The bank made four current period CD investments, which totaled \$473,316, and 35 qualified grants totaling \$161,437. The bank had no unfunded commitments. The bank's CD investments were responsive to affordable housing needs and community services to LMI communities.

The bank complemented its investments with \$1,600 of in-kind contributions, which consisted of several computers and equipment to a nonprofit organization.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Owensboro MSA and Lexington MSA is stronger than the bank's overall performance under the Investment Test in the full-scope area. The stronger performance is based on the excellent level of qualified CD investment and grants, which did have a significantly positive impact on the bank's overall Investment Test performance rating for the state.

SERVICE TEST

The bank's performance under the Service Test in the state of Kentucky is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Kentucky non-MSA is adequate.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
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	Low	Mod	Mid	Upp
KY Non-MSA	71.1	4	50.0	0.0	0.0	75.0	25.0	0.0	3.8	67.8	28.4
Owensboro MSA	18.9	3	37.5	0.0	66.7	0.0	33.3	3.7	24.2	46.4	25.6
Lexington-Fayette MSA	10.0	1	12.5	0.0	0.0	100.0	0.0	11.6	22.4	33.3	32.7

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
KY Non-MSA	0	0	0	0	0	0
Owensboro MSA	0	1	0	0	-1	0
Lexington-Fayette MSA	0	0	0	0	0	0

During the pandemic, the bank offered additional services such as curbside banking, cashing stimulus checks for non-customers, and offering leniency on waiving non-sufficient funds and overdraft fees and early withdrawal penalties. With lobby closures, branch personnel worked to help meet community banking needs through drive-through facilities and digital banking services. The bank received positive consideration for these activities in response to the pandemic.

Kentucky Non-MSA

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank's AA.

The bank has four branches in the AA, with none in moderate-income CTs. There are no low-income CTs in the AA. The percentage of the branch located in LMI areas is below the percentage of the population residing in the geographies.

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

The bank complements its traditional service delivery methods in the AA with certain alternative retail delivery systems, such as bill payment, deposit-taking ATMs, debit card, direct deposit, mobile banking, online banking, remote deposit service, and telephone banking.

ONB has four deposit-taking ATMs in the AA, of which none are in moderate-income CTs of the AA. We did not place significant weight on alternative delivery systems, as the bank did not maintain or provide metrics to determine their effectiveness in helping meet the needs of LMI individuals.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. All branches operate during similar banking hours.

Community Development Services

Kentucky Non-MSA

The bank provides a significant level of CD services.

CD Services were effective and responsive in addressing the community's needs. During the evaluation period, 25 bank employees from various lines of business partnered with 28 organizations and contributed a total of 877 hours supporting LMI individuals and families. This included serving on committees and boards for 14 various organizations that promote affordable housing, community services, and economic developments for LMI CTs within the AA.

Refer to the Other Performance section under the Scope of the Evaluation section for additional details regarding the bank's CD services.

The following are examples of CD services provided in this AA:

- A bank employee provided 90 hours to support an organization's Volunteer Income Tax Assistance (VITA) by helping to encourage savings with tax refunds. The VITA program offers free tax help to LMI individuals, persons with disabilities, and limited English-speaking taxpayers who need assistance in preparing their own tax returns. Certified volunteers provide free basic income tax return preparation with electronic filing to qualified individuals.
- Three employees provided 73 hours of support to a group that supports small businesses. The group serves to develop, enhance, and maintain a viable business climate in the county. They provide leadership for the economic growth, educational development, a better quality of life to constituents. The organization is located in underserved or distressed CT.
- A bank employee provided 70 hours of board service to a nonprofit organization that offers shelter and a food pantry for homeless families.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Owensboro MSA is consistent with the bank's overall performance under the Service Test in the full-scope area. Lexington MSA is weaker than the bank's overall performance under the Service Test in the full-scope area. The weaker performance is based on the branch distribution in LMI CTs. The weaker performance did not have an impact on the bank's overall Service Test performance rating for the state.

State of Michigan

CRA rating for the State of Michigan⁷: Outstanding

The Lending Test is rated:	Outstanding
The Investment Test is rated:	High Satisfactory
The Service Test is rated:	High Satisfactory

The major factors that support this rating include:

- Lending levels reflect good responsiveness to AA credit needs.
- The bank exhibits excellent geographical distribution and adequate borrower distribution of loans.
- The bank is a leader in making CD loans. The bank makes extensive use of flexible home mortgage loans products. CD loans and the use of flexible mortgage products had a significantly positive impact on the Lending Test rating in Michigan.
- The bank has a significant level of qualified investments.
- The bank's service delivery systems are readily accessible to geographies and individuals of different income levels in its AAs.
- The bank provides a relatively high level of CD services.

Description of Institution's Operations in the State of Michigan

ONB has eight AAs within the state of Michigan. For purposes of this evaluation, the 13 AAs were combined and presented as the four AAs which are the Detroit-Warren-Ann Arbor CSA (Detroit CSA), Grand Rapids-Kentwood MSA (Grand Rapids MSA), Jackson MSA, and Kalamazoo-Battle Creek-Portage MSA (Kalamazoo MSA).

Refer to Appendix A, Scope of Examination, for a list of counties within each AA. The AA complies with the regulation and does not arbitrarily exclude any LMI areas.

ONB has \$1.3 billion in deposits representing 6.7 percent of the total bank deposits. ONB operates 18 branches within the state representing 11.1 percent of total number of bank branches. The bank made 12.7 percent of its loan originations and purchases compared to total bank loans during the evaluation period in the state. The bank's primary loan products in the state of Michigan are home mortgages and small business loans.

According to the FDIC deposit market share data, ONB had a 0.6 percent market share making it the 18th largest deposit holder out of 103 financial institutions in the state. The bank operates 18 branches and 20 deposit-taking ATMs within the state.

⁷ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Detroit CSA

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

Table A – Demographic Information of the Assessment Area						
Assessment Area: Detroit-Warren-Ann Arbor CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	123	0.8	11.4	61.8	25.2	0.8
Population by Geography	433,929	0.4	10.5	61.8	27.3	0.0
Housing Units by Geography	180,984	0.3	11.4	63.1	25.2	0.0
Owner-Occupied Units by Geography	134,075	0.2	7.3	63.8	28.7	0.0
Occupied Rental Units by Geography	31,435	0.7	27.1	58.1	14.2	0.0
Vacant Units by Geography	15,474	0.3	15.1	67.5	17.0	0.0
Businesses by Geography	29,256	0.2	13.3	57.6	28.9	0.0
Farms by Geography	1,821	0.1	3.1	69.9	27.0	0.0
Family Distribution by Income Level	117,915	16.3	17.8	22.0	43.9	0.0
Household Distribution by Income Level	165,510	19.3	15.7	18.4	46.6	0.0
Median Family Income MSA - 33780 Monroe, MI MSA		\$67,811	Median Housing Value			\$152,512
Median Family Income MSA - 47664 Warren-Troy- Farmington Hills, MI		\$76,739	Median Gross Rent			\$833
Median Family Income Non-MSAs - MI		\$53,628	Families Below Poverty Level			6.7%
<i>Source: 2015 ACS and 2021 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The bank's AA has 123 CTs which includes one low-income, 14 moderate-income, 76 middle-income, 31 upper-income, and one NA-income. The AA complies with the regulation and does not arbitrarily exclude any LMI areas.

The bank operates nine branches and nine deposit-taking ATMs within the AA.

Housing Characteristics

Conditions in the housing market make it challenging for home buyers as demand exceeds housing supply and prices continue to trend upwards. The lack of affordable housing has made it difficult for LMI families to purchase homes and to rent housing in the AA.

The AA is a high cost housing area, limiting access to affordable home ownership among low-income borrowers. The 2021 FFIEC AMFI in the AA is \$62,800. According to Realtor.com data, the median housing value in the AA is \$219,900 and \$217,500 in January 2019 and December 2021, respectively, reflecting a 1 percent decrease.

Assuming a 30-year mortgage with a 5 percent interest rate and not accounting for down payment, homeowner’s insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$31,400 per year (or less than 50 percent of the 2021 FFIEC AMFI in the AA) could afford a \$146,231 mortgage with a payment of \$785 per month. A moderate-income borrower making \$50,240 per year (or less than 80 percent of the 2021 FFIEC AMFI in the AA) could afford a \$233,970 mortgage with a payment of \$1,256 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA.

Community Contacts

The OCC made two community contacts in the AA during the evaluation period, which consisted of nonprofit organizations focused on community services to LMI areas. The community contacts indicated that the following are identified needs within the bank’s AA:

- Willingness to accept a wide range of mortgage down payment and closing cost assistance
- Financing to owners of multifamily building due to the lack of affordable rental properties
- Commercial/industrial land purchase and construction loans
- Funding to nonprofit organizations

Kalamazoo CSA

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

Table A – Demographic Information of the Assessment Area						
Assessment Area: Kalamazoo-Battle Creek-Portage CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	96	11.5	24.0	40.6	22.9	1.0
Population by Geography	391,542	9.3	18.8	43.6	26.9	1.4
Housing Units by Geography	170,912	9.8	19.9	44.3	25.7	0.2
Owner-Occupied Units by Geography	100,942	5.0	14.7	47.8	32.5	0.0
Occupied Rental Units by Geography	52,249	16.6	27.2	40.2	15.5	0.6
Vacant Units by Geography	17,721	17.5	27.9	37.0	17.3	0.4
Businesses by Geography	24,026	8.3	21.7	41.6	28.0	0.4
Farms by Geography	1,055	3.1	11.6	57.1	28.1	0.2
Family Distribution by Income Level	94,063	20.9	17.0	19.8	42.2	0.0
Household Distribution by Income Level	153,191	24.0	16.3	17.2	42.5	0.0
Median Family Income MSA - 12980 Battle Creek, MI MSA		\$53,315	Median Housing Value			\$121,266
Median Family Income MSA - 28020 Kalamazoo-Portage, MI MSA		\$63,609	Median Gross Rent			\$712
			Families Below Poverty Level			12.0%

*Source: 2015 ACS and 2021 D&B Data
Due to rounding, totals may not equal 100.0
(* The NA category consists of geographies that have not been assigned an income classification.*

The bank's AA has 96 CTs, which includes 11 low-income, 23 moderate-income, 39 middle-income, 22 upper-income, and one NA-income. The AA complies with the regulation and does not arbitrarily exclude any LMI areas.

The bank operates four branches and five deposit-taking ATMs within the AA.

Housing Characteristics

Conditions in the housing market make it challenging for home buyers as demand exceeds housing supply and prices continue to trend upwards. The lack of affordable housing has made it difficult for LMI families to purchase homes and to rent housing in the AA.

The AA is a high cost housing area, limiting access to affordable home ownership among low-income borrowers. The 2021 FFIEC AMFI in the AA is \$81,100. According to Realtor.com data, the median housing value in the AA is \$229,500 and \$269,900 in January 2019 and December 2021, respectively, reflecting a 17.6 percent increase.

Assuming a 30-year mortgage with a 5 percent interest rate and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$40,550 per year (or less than 50 percent of the 2021 FFIEC AMFI in the AA) could afford a \$188,843 mortgage with a payment of \$1,014 per month. A moderate-income borrower making \$64,480 per year (or less than 80 percent of the 2021 FFIEC AMFI in the AA) could afford a \$302,149 mortgage with a payment of \$1,622 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA.

Community Contacts

The OCC made two community contacts in the AA during the evaluation period, which consisted of nonprofit organizations focused on neighborhood revitalization. The community contacts indicated that the following are identified needs within the bank's AA:

- Home mortgages in LMI areas
- Financing to owners of multifamily building due to the lack of affordable rental properties
- Funding to redevelopment projects
- Provide internships
- Supporting nonprofit foundations and CDFIs

Scope of Evaluation in the State of Michigan

For the state of Michigan, the Detroit CSA and Kalamazoo CSA received full-scope reviews. The combined Detroit CSA and Kalamazoo CSA represents 67.0 percent of total bank deposits, 72.2 percent of total bank branches, and 46.9 percent of loan originations and purchases within the rating area. The Grand Rapids CSA and Jackson CSA received limited-scope reviews.

For the Kalamazoo CSA, the bank did not originate or purchase a sufficient volume of small farm loans during the evaluation period to perform a meaningful analysis. Small farm loans are not a primary product for the bank in this AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF MICHIGAN

LENDING TEST

The bank's performance under the Lending Test in the state of Michigan is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Detroit CSA and Kalamazoo CSA is excellent.

Lending Activity

Lending levels reflect good responsiveness to credit needs in the state of Michigan.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Detroit CSA	1,374	668	21	20	2,083	31.3	37.3
Grand Rapids CSA	2,866	1,007	2	5	3,880	58.3	28.7
Jackson MSA	83	9	0	2	95	1.4	4.2
Kalamazoo CSA	472	73	9	19	573	8.6	29.7
Statewide	--	--	--	22	22	0.3	--

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.
"--" data not available.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Detroit CSA	240,745	93,337	1,256	36,500	371,838	23.2	37.3
Grand Rapids CSA	757,836	183,643	454	2,684	944,617	58.9	28.7
Jackson MSA	32,827	7,608	0	1,791	42,226	2.6	4.2
Kalamazoo CSA	113,415	71,381	289	18,100	203,185	12.7	29.7
Statewide	--	--	--	42,386	42,386	2.6	--

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.
"--" data not available.

Detroit CSA

Lending levels reflect good responsiveness to AA credit needs.

According to FDIC Deposit Market Share data, ONB had \$489.3 million in deposits in the Detroit CSA. The bank had a 6.2 percent deposit market share in the AA. The bank's deposit market share ranked seventh out of 18 deposit-taking institutions in the AA. The bank's deposit market share ranking was in the top 38.9 percent of all deposit-taking institutions in the AA.

According to 2021 peer HMDA data, ONB had a 1.8 percent market share of HMDA loan originations in the AA.

The bank's market share of HMDA loan originations was well below their deposit market share. The bank's market share of HMDA loan originations ranked tenth out of 440 HMDA lenders in the AA. The bank's market share of HMDA loan originations ranked in the top 2.3 percent in the AA. The bank's market share ranking of HMDA loan originations was stronger than their deposit market share ranking.

According to 2020 peer small business data, ONB had a 3.9 percent market share of small business loan originations. The bank's market share of small business loan originations was below their deposit market share. The bank's market share of small business loan originations ranked tenth out of 108 small business lenders in the AA. The bank's market share ranking of small business loans was in the top 9.3 percent of all small business lenders in the AA. The bank's market share ranking of small business loans was stronger than their deposit market share ranking.

Kalamazoo MSA

Lending levels reflect good responsiveness to AA credit needs.

According to FDIC Deposit Market Share data, ONB had \$389.3 million in deposits in the Kalamazoo MSA. The bank had a 6.3 percent deposit market share in the AA. The bank's deposit market share ranked sixth out of 17 deposit-taking institutions in the AA. The deposit market share ranked in the top 35.3 percent of all deposit-taking institutions.

According to 2021 peer HMDA data, ONB had a 1 percent market share of HMDA loan originations. The bank's market share of HMDA loan originations was well below their deposit market share. The bank's market share of HMDA loan originations ranked 26th out of 389 HMDA lenders in the AA. The bank's market share ranking of HMDA loan originations was in the top 6.7 percent of all HMDA lenders in the AA. The bank's market share ranking of HMDA loan originations was stronger than their deposit market share ranking.

According to 2020 peer small business data, ONB had a 4.5 percent market share of small business loan originations. The bank's market share of small business loan origination was below their deposit market share. The bank's market share of small business loan originations ranked ninth out of 96 small business lenders in the AA. The bank's market share ranking of small business loans was in the top 9.4 percent of all lenders in the AA. The bank's market share ranking of small business loans was stronger than their deposit market share ranking.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent distribution of loans in its AAs.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects a good distribution.

Refer to Table O 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.

Detroit CSA

The geographic distribution of home mortgage loans is excellent. We considered the fact that there was very limited opportunity to lend to owner-occupied housing in low-income CTs; therefore, we placed a significantly greater amount of weight on performance in moderate-income geographies.

The proportion of loans in low-income geographies is below the percentage of owner-occupied housing and approximates the aggregate industry distribution of loans to those geographies. The proportion of loans to moderate-income geographies approximated the percentage of owner-occupied housing and exceeded the aggregate industry distribution of loans to those geographies.

Kalamazoo CSA

The geographic distribution of home mortgage loans is good. The proportion of loans in low-income geographies is below the percentage of owner-occupied housing and exceeded the aggregate industry distribution of loans to those geographies. The proportion of loans to moderate-income geographies is below the percentage of owner-occupied housing and near to the aggregate industry distribution of loans to those geographies.

Small Loans to Businesses

The geographic distribution of small business loans reflects an excellent distribution.

Refer to Table Q 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.

Detroit CSA

The geographic distribution of small business loans is excellent. We considered the fact that there was very limited opportunity to lend to small businesses in low-income CTs; therefore, we placed a significantly greater amount of weight on performance in moderate-income geographies. The proportion of loans in low-income geographies was below the percentage of businesses and the aggregate industry distribution of loans to those geographies. The proportion of loans in moderate-income geographies exceeded the percentage of businesses and the aggregate industry distribution of loans to those geographies.

Kalamazoo CSA

The geographic distribution of small business loans is excellent. The proportion of loans in low-income geographies exceeded the percentage of businesses and the aggregate industry distribution of loans to those geographies. The proportion of loans in moderate-income geographies exceeded the percentage of businesses and was near to the aggregate industry distribution of loans to those geographies.

Small Loans to Farms

The geographic distribution of small farm loans reflects a poor distribution.

Refer to Table S 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 farms.

Detroit CSA

The geographic distribution of farm loans is poor. The proportion of loans in low-income geographies was below the percentage of businesses and near the aggregate industry distribution of loans to those geographies. The proportion of loans in moderate-income geographies was significantly below the percentage of farms and the aggregate industry distribution of loans to those geographies.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed the bank's lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels and business and farms of different sizes given the product lines offered by the bank.

Home Mortgage Loans

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

Refer to Table P 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.

Detroit CSA

The distribution of home mortgage loans among individuals of different income levels is good. The proportion of loans to low-income borrowers was below the percentage of families and exceeded the aggregate distribution of loans to those borrowers. The proportion of loans to moderate-income borrowers was near the percentage of families and was below the aggregate distribution of loans to those borrowers.

Kalamazoo MSA

The distribution of home mortgage loans among individuals of different income levels is adequate. The proportion of loans to low-income borrowers was well below the percentage of families and below the aggregate distribution of loans to those families. The proportion of loans to moderate-income borrowers exceeded the percentage of families and was below the aggregate distribution of loans to those borrowers.

Small Loans to Businesses

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

Refer to Table R 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.

Detroit CSA

The distribution of loans to businesses of different sizes is adequate. The proportion of bank loans to businesses with revenues less than \$1 million was significantly below the percentage of businesses and below the aggregate industry distribution of loans to those businesses.

Kalamazoo MSA

The distribution of loans to businesses of different sizes is adequate. The proportion of bank loans to businesses with revenues less than \$1 million was significantly below the percentage of businesses and below the aggregate industry distribution of loans to those businesses.

Small Loans to Farms

The distribution of loans to farms of different sizes is good.

Refer to Table T in the state of Michigan 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.

Detroit CSA

The proportion of loans to farms with revenues less than \$500,000 was well below the percentage of farms and exceeded the aggregate industry distribution of loans to those businesses.

Community Development Lending

The bank is a leader in making CD loans. CD loans had a significantly positive impact on the Lending Test rating.

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

Detroit CSA

The bank is a leader in making CD loans in the Detroit CSA. CD loans had a significantly positive impact on the Lending Test rating. Throughout the evaluation period, ONB made 20 CD loans totaling \$36.5 million in the Detroit CSA. CD loan volume was equivalent to 71.6 percent of allocated tier 1 capital. CD loans were responsive to community needs related to affordable housing.

Examples of CD loans the bank made in the AA include:

- \$860,000 loan to finance the purchase of an affordable housing multifamily apartment complex in a middle-income CT. Projected rents remain below HUD's LMI rent threshold and range from \$595 to \$775 for one-to-three bedroom units.
- \$545,408 loan to refinance an existing \$200,000 first mortgage, payable to another bank. This refinancing supports an affordable housing project located in a low-income CT and has six one-bedroom unit apartments.

- \$517,500 loan to refinance affordable housing. The project is a 12-unit multifamily apartment complex, purchased on land contract. The complex is in a moderate-income CT, and the majority of the units are below the HUD's LMI rent threshold.

Kalamazoo CSA

The bank is a leader in making CD loans in the Kalamazoo CSA. CD loans had a significantly positive impact on the Lending Test rating. Throughout the evaluation period, ONB made 19 CD loans totaling \$18.1 million in the Kalamazoo CSA. CD loan volume was equivalent to 44.5 percent of allocated tier 1 capital. CD loans were responsive to community revitalization and stabilization and community service needs.

Examples of CD loans the bank made in the AA include:

- \$3.9 million loan and \$2.8 million loan renewal for redevelopment of a tower in a neighborhood enterprise zone. The project will be a mixed-use property with 88 market-rate apartment units and 42,00 square feet of office and retail space. It's estimated to create 15 full-time jobs.
- \$1.5 million loan for working capital to support operations at a housing resources organization that provides affordable housing/community services to LMI individuals and families.
- \$1.5 million PPP loan for working capital to support operations and retain jobs at a construction company in a LMI CT during the pandemic.

Product Innovation and Flexibility

The bank makes extensive use of flexible lending practices to serve AA credit needs.

Refer to the Other Loan Performance section under the Scope of the Evaluation section for additional details regarding other programs.

Michigan State Housing Development Authority (MSHDA)

MSHDA offers the Home Loan Flex and Home Loan. These programs are designed for first-time and repeat homebuyers looking for a more flexible loan product and can be used with the Michigan Down Payment loan. Home Loan Flex is available to first-time home buyers throughout the state of Michigan with DPA up to \$7,500 and a homebuyer education class required. Over the course of the evaluation period, ONB originated 43 of these loans totaling \$4.8 million within the state of Michigan.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Grand Rapids MSA and Jackson MSA is weaker than the bank's performance in full-scope AAs. Weaker performance is due to a smaller percentage of lending in LMI geographies compared to demographic and aggregate comparators. Performance in limited-scope AAs for geographical distribution of loans is good. Limited-scope AAs had a neutral impact on the Lending Test rating.

Refer to Tables O through T in the state of Michigan section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in state of Michigan is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the Detroit CSA and Kalamazoo CSA are good.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Detroit CSA	42	4,620	137	12,092	179	44.3	16,712	31.1	0	0
Grand Rapids CSA	17	952	85	11,206	102	25.2	12,158	22.6	0	0
Jackson MSA	1	201	7	270	8	2.0	471	0.9	0	0
Kalamazoo CSA	0	0	110	22,837	110	27.2	22,837	42.5	0	0
Statewide	3	1,503	2	4	5	1.2	1,507	2.8	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.
 ** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Conclusions for Area Receiving a Full-Scope Review

Detroit CSA

The bank has an excellent level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits adequate responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

ONB had 179 qualified CD investments and donations totaling \$16.7 million, which is equivalent to 32.7 percent of allocated tier 1 capital. The bank made 47 current period CD investments, which totaled \$11.7 million, and 90 qualified grants totaling \$374,000.

Additionally, the AA benefitted from the ongoing impact of 42 prior period CD investments with an outstanding balance of \$4.6 million. The bank had no unfunded commitments. The bank's CD investments were responsive to affordable housing needs and community services to LMI communities in the AA.

The investments consisted of \$10.2 million in MBS and \$1.6 in municipal bonds.

Kalamazoo CSA

The bank has an excellent level of qualified CD investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits adequate responsiveness to credit and community economic development needs. The bank makes significant use of innovative and/or complex investments to support CD initiatives.

ONB had 110 qualified CD investments and donations totaling \$22.8 million, which is equivalent to 56.2 percent of allocated tier 1 capital. The bank made 15 current period CD investments, which totaled \$22.5 million, and 95 qualified grants totaling \$342,400. The bank’s CD investments were responsive to affordable housing needs and community services to LMI communities in the AA. The investments consisted of \$15.5 million in school bonds and over \$1 million in MBS.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s performance under the Investment Test in the Grand Rapids CSA and Jackson MSA is stronger than the bank’s overall performance under the Investment Test in the full-scope areas. The performance is based on the excellent level of qualified CD investment and grants, which had a neutral impact on the bank’s overall Investment Test performance rating for the state.

SERVICE TEST

The bank’s performance under the Service Test in state of Michigan is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Detroit CSA is good and Kalamazoo CSA is excellent.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank’s AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits % of Rated Area Deposits in AA	Branches						Population			
		# 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	Low	Mod	Mid	Upp
Detroit CSA	37.3	9	50.0	0.0	22.2	44.4	33.3	0.4	10.5	61.8	27.3
Grand Rapids CSA	28.7	4	22.2	0.0	0.0	50.0	50.0	5.3	16.7	50.1	28.0
Jackson MSA	4.2	1	5.6	0.0	100.0	0.0	0.0	9.9	19.4	47.4	20.1
Kalamazoo CSA	29.7	4	22.2	25.0	25.0	25.0	25.0	9.3	18.8	43.6	26.9

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Detroit CSA	0	2	0	0	-1	-1
Grand Rapids CSA	0	1	0	0	-1	0
Jackson MSA	0	0	0	0	0	0
Kalamazoo CSA	0	1	0	0	-1	0

During the pandemic, the bank offered additional services such as curbside banking, cashing stimulus checks for non-customers, and offering leniency on waiving non-sufficient funds and overdraft fees and early withdrawal penalties. With lobby closures, branch personnel worked to help meet community banking needs through drive-through facilities and digital banking services. The bank received positive consideration for these activities in response to the pandemic.

Detroit CSA

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank's AA.

The bank has nine branches in the AA, with none in a low-income CTs and two in moderate-income CTs. The percentage of branches located in LMI areas is below the percentage of the population residing in the geographies.

To the extent changes have been made, the bank's closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank did not open branches during the evaluation period. In April 2020, the bank closed a branch in a moderate-income CT and a branch in an upper-income CT.

The bank complements its traditional service delivery methods in the AA with certain alternative retail delivery systems, such as bill payment, deposit-taking ATMs, debit card, direct deposit, mobile banking, online banking, remote deposit service, and telephone banking.

ONB has nine ATMs in the AA, of which two deposit-taking ATMs are in moderate-income CTs. We did not place significant weight on alternative delivery systems, as the bank did not maintain or provide metrics to determine their effectiveness in helping meet the needs of LMI individuals.

Kalamazoo CSA

Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's AA.

The bank has four branches in the AA, with one in a low-income CT and one in a moderate-income CT. The percentage of the branch located in LMI areas exceeds the percentage of the population residing in the geographies.

To the extent changes have been made, the bank's closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI

individuals. The bank did not open any branches during the evaluation period. In April 2020, the bank closed a branch in a middle-income CT.

The bank complements its traditional service delivery methods in the AA with certain alternative retail delivery systems, such as bill payment, deposit-taking ATMs, debit card, direct deposit, mobile banking, online banking, remote deposit service, and telephone banking.

ONB has five ATMs in the AA, of which three deposit-taking ATMs are in LMI CTs. We did not place significant weight on alternative delivery systems, as the bank did not maintain or provide metrics to determine their effectiveness in helping meet the needs of LMI individuals.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. All branches operate during similar banking hours.

Community Development Services

The bank provides a relatively high level of CD services.

Detroit CSA

The bank is a leader in providing CD services.

CD services were effective and responsive in addressing the community's needs. During the evaluation period, 52 bank employees from various lines of business partnered with 45 organizations and contributed a total of 1,836 hours supporting LMI individuals and families. This included serving on committees and boards for 28 various organizations that promote affordable housing, community services, and economic developments for LMI communities within the AA.

The following are examples of CD services provided in this AA:

- Two employees provided 168 hours of board and committee support to a nonprofit organization that assists economically disadvantaged young women achieve self-sufficiency. The organization programming spans middle school, high school, and continues through college and careers to LMI individuals. They do this with year-round, comprehensive programming focusing on academic readiness, social/emotional life skills, financial education, and community service.
- Four bank associates provided 143 hours of support to a nonprofit organization whose mission is to transform lives through affordable homeownership.
- Their programs build and sell homes to low-income families enabling them to grow and thrive in safe, affordable, and stable housing. Associates served as a board member, treasurer, and by providing financial expertise, budget oversight, and assistance with strategic initiatives.
- Five employees provided 113 hours of board service to a community-based nonprofit that provides services to LMI individuals and families. The organization promotes housing stability and family self-sufficiency through various programs and provide comprehensive services.

Kalamazoo CSA

The bank provides a significant level of CD services.

CD services were effective and responsive in addressing the community's needs. During the evaluation period, 30 bank employees from various lines of business partnered with 28 organizations and contributed a total of 1,347 hours supporting LMI individuals and families. This included serving on committees and boards for 21 various organizations that promote affordable housing, community services, and economic developments for LMI communities within the AA. Services reflected ongoing relationships with several organizations in the AA.

Refer to the Other Performance section under the Scope of the Evaluation section for additional details regarding the bank's CD services.

The following are examples of CD services provided in this AA:

- 20 bank employees provided 349 hours of financial education to the constituents of a nonprofit organization, which enables young people to reach their full potential. The organization's programs empower inclusion for LMI youth and adults.
- An employee provided 171 hours of board service to an organization that offers shelter and a food pantry for homeless families, after school and sports programs, summer camps, and free medical and dental care.
- Six bank employees provided 70 hours of board and volunteerism to a nonprofit organization. The mission of the organization is to assure housing for socially or economically vulnerable individuals in the county.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Grand Rapids CSA and Jackson MSA is weaker than the bank's overall performance under the Service Test in the full-scope areas. The weaker performance is based on the branch distribution in LMI CTs. The weaker performance did not have an impact on the bank's overall Service Test performance rating for the state.

State of Minnesota

CRA rating for the State of Minnesota⁸: Satisfactory

The Lending Test is rated:	Low Satisfactory
The Investment Test is rated:	Outstanding
The Service Test is rated:	High Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs.
- The bank had an adequate geographical and borrower distribution of loans.
- The bank has an excellent level of qualified investments.
- The bank's service delivery systems are accessible to geographies and individuals or different income levels in its AAs.
- The bank is a leader in providing CD services.

Description of Institution's Operations in the State of Minnesota

ONB has three AAs within the state of Minnesota, which are Mankato MSA, Minneapolis-Saint Paul-Bloomington MSA (Minneapolis MSA), and Minnesota non-MSA.

Refer to Appendix A, Scope of Examination, for a list of counties within each AA. The AA complies with the regulation and does not arbitrarily exclude any LMI areas.

ONB has \$4.1 billion in deposits representing 20.9 percent of the total bank deposits. ONB operates 31 branches within the state representing 19.1 percent of total number of bank offices. The bank made 24 percent of its loan originations and purchases compared to total bank loans during the evaluation period in the state. The bank's primary loan products in the state of Minnesota are home mortgages and small business loans.

According to the FDIC deposit market share data, ONB had a 1.4 percent market share making it the ninth largest deposit holder out of 316 financial institutions in the state. The bank operates 31 branches and 32 deposit-taking ATMs within the state.

Minneapolis-St Paul-Bloomington MSA

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

⁸ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Minneapolis-St Paul-Bloomington MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	732	7.4	21.6	43.3	26.8	1.0
Population by Geography	3,171,206	6.0	18.6	45.5	29.6	0.3
Housing Units by Geography	1,289,111	5.6	19.4	46.3	28.3	0.3
Owner-Occupied Units by Geography	847,611	2.2	14.5	48.9	34.3	0.1
Occupied Rental Units by Geography	378,382	12.8	29.8	40.7	15.9	0.9
Vacant Units by Geography	63,118	9.2	22.0	46.4	21.6	0.8
Businesses by Geography	348,642	5.1	16.6	45.1	33.0	0.3
Farms by Geography	8,068	1.9	10.9	54.6	32.5	0.0
Family Distribution by Income Level	788,752	20.2	17.2	22.0	40.5	0.0
Household Distribution by Income Level	1,225,993	23.6	16.1	18.4	42.0	0.0
Median Family Income MSA - 33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA	\$84,589	Median Housing Value				\$230,018
		Median Gross Rent				\$965
		Families Below Poverty Level				7.0%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The bank's AA has 732 CTs, which includes 54 low-income, 158 moderate-income, 317 middle-income, 196 upper-income, and seven NA-income. The AA complies with the regulation and does not arbitrarily exclude any LMI areas.

The bank operates 28 branches and 29 deposit-taking ATMs within the AA.

Housing Characteristics

Conditions in the housing market make it challenging for home buyers as demand exceeds housing supply and prices continue to trend upwards. The lack of affordable housing has made it difficult for LMI families to purchase homes and to rent housing in the AA.

The AA is a high cost housing area, limiting access to affordable home ownership among low-income borrowers. The 2021 FFIEC AMFI in the AA is \$100,600. According to Realtor.com data, the median housing value in the AA is \$379,403 and \$354,268 in January 2019 and December 2021, respectively, reflecting a 6.6 percent decrease.

Assuming a 30-year mortgage with a 5 percent interest rate and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$50,300 per year (or less than 50 percent of the 2021 FFIEC AMFI in the AA) could afford a \$234,249 mortgage with a payment of \$1,258 per month. A moderate-income borrower making \$80,480 per year (or less than 80 percent of the 2021 FFIEC AMFI in the AA) could afford a \$374,799 mortgage with a payment of \$2,012 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA.

Community Contacts

The OCC made seven community contacts in the AA during the evaluation period, which consisted of nonprofit organizations focused on neighborhood revitalization and economic development in LMI and three county agencies. Community contacts indicated that the following are identified needs within the bank’s AA:

- Home mortgages in LMI areas for first time homebuyers
- Willingness to accept a wide range of mortgage down payment, closing cost assistance, or subsidized programs
- Commercial/industrial land purchase and construction loans
- Small loans to small businesses, specifically to start-ups
- Technical assistance to small business owners

Scope of Evaluation in the State of Minnesota

For the state of Minnesota, the Minneapolis MSA received a full-scope review. The Minneapolis MSA represents 94.7 percent of total bank deposits, 90.3 percent of total bank branches, and 93.8 percent of loan originations and purchases within the rating area. The Mankato MSA and Minnesota non-MSA received limited-scope reviews.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF MINNESOTA

LENDING TEST

The bank’s performance under the Lending Test in state of Minnesota is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Minneapolis CSA is adequate.

Lending Activity

Lending levels reflect good responsiveness to credit needs in the state of Minnesota.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Mankato MSA	49	103	6	2	160	1.4	1.3
Minneapolis MSA	4,169	6,372	143	85	10,769	92.4	94.7
MN Non-MSA	101	222	398	4	725	6.2	4.0
Statewide	--	--	--	4	4	0.0	--
*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only. "--" data not available.							

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Mankato MSA	6,985	18,185	529	294	25,993	0.9	1.3
Minneapolis MSA	1,425,420	1,008,121	10,961	283,918	2,728,420	95.6	94.7
MN Non-MSA	8,871	12,155	47,180	18,714	86,920	3.0	4.0
Statewide	--	--	--	13,713	13,713	0.5	--
*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only. "--" data not available.							

According to FDIC Deposit Market Share data, ONB had \$3.9 billion in deposits in the Minneapolis MSA. The bank had a 1.7 percent deposit market share in the AA. The bank's deposit market share ranked eighth out of 124 deposit-taking institutions in the AA. The bank's deposit market share ranking was in the top 6.5 percent of all deposit-taking institutions in the AA.

According to 2021 peer HMDA data, ONB had a 0.6 percent market share of HMDA loan originations in the Minneapolis MSA. The bank's market share of HMDA loan originations was well below their deposit market share. The bank's market share of HMDA loan originations ranked 35th out of 692 HMDA lenders in the AA. The bank's market share of HMDA loan originations ranked in the top 5.1 percent of all HMDA lenders. The bank's market share of HMDA loan originations was stronger than their deposit market share ranking.

According to 2020 peer small business data, ONB had a 4.4 percent market share of small business loan originations in the Minneapolis MSA. The bank market share of small business loan originations was stronger than their deposit market share. The bank's market share of small business loan originations ranked fourth out of 226 small business lenders in the AA. The bank's market share ranking of small business loans was in the top 1.8 percent of all small business lenders. The bank's market share ranking of small business loans was stronger than their deposit market share ranking.

According to 2020 peer small business data, ONB had 9.0 percent market share of small farm loan originations. The bank's market share of small farm loan originations was stronger than their deposit market share in the AA. The bank's market share ranking of small farm loan originations ranked fourth out of 35 small farm lenders in the AA. The bank's market share ranking of small farm loans was in the top 11.4 percent of all small farm lenders. The bank's market share ranking of small farm loans was below their deposit market share ranking.

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in its AAs.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects a poor distribution.

Refer to Table O in the state of Minnesota 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 is poor. The proportion of loans in low-income geographies was well below the percentage of owner-occupied housing and the aggregate industry

distribution of loans to those geographies. The proportion of loans to moderate-income geographies was significantly below the percentage of owner-occupied housing and the aggregate industry distribution of loans to those geographies.

Small Loans to Businesses

The geographic distribution of small business loans reflects adequate distribution.

Refer to Table Q in the state of Minnesota 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 business loans is adequate. The proportion of loans in low-income geographies was significantly below the percentage of businesses and well below the aggregate industry distribution of loans to those geographies. The proportion of loans in moderate-income geographies was below the percentage of businesses and near to the aggregate industry distribution of loans to those geographies.

Small Loans to Farms

The geographic distribution of small farm loans reflects a very poor distribution.

Refer to Table S in the state of Minnesota 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 geographic distribution of small farm loans is very poor. The proportion of loans in low-income geographies was significantly below the percentage of businesses and the aggregate industry distribution of loans to those geographies. The proportion of loans in moderate-income geographies was significantly below the percentage of businesses and the aggregate industry distribution of loans to those geographies.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed the bank's lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels and business and farms of different sizes given the product lines offered by the bank.

Home Mortgage Loans

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

Refer to Table P in the state of Minnesota 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 proportion of loans to low-income borrowers was well below the percentage of families and near the aggregate distribution of loans to those borrowers. The proportion of loans to moderate-income borrowers substantially meets the percentage of families and is below the aggregate distribution of loans to those borrowers.

Small Loans to Businesses

The distribution of loans to businesses of different sizes is poor.

Refer to Table R in the state of Minnesota 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 proportion of loans to businesses with revenues less than \$1 million was significantly below the percentage of businesses and well below the aggregate industry distribution of loans to those businesses.

Small Loans to Farms

The distribution of loans to farms of different sizes is excellent.

Refer to Table T in the state of Minnesota 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 proportion of loans to farms with revenues of less than \$500,000 was below the percentage of farms and exceeded the aggregate industry distribution of loans to those farms.

Community Development Lending

The bank made a relatively high level of CD loans.

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

Throughout the evaluation period, ONB made 85 CD loans totaling \$283.9 million in the Minneapolis CSA. CD loan volume was equivalent to 70.4 percent of allocated tier 1 capital. CD loans were responsive to the community needs related to the revitalization of needed community infrastructure and added affordable housing. The bank's CD loans in the AA demonstrated complexity through working with various local municipal groups.

Examples of CD loans the bank made in the AA include:

- \$83.6 million to improve and expand two hospitals located within low-income CTs. The hospitals serve primarily LMI individuals within the local community. The proceeds will improve essential city facilities.
- \$22.7 million loan to finance the construction of a multi-purpose building located within a moderate-income CT. The loan proceeds will finance 170 units of market-rate housing and redevelop several vacant commercial buildings.

- \$13.3 million loan for revitalization and stabilization. The loan was made in conjunction with a municipal plan designed to revitalize this neighborhood. The project will include a grocery store, which will also create employment opportunities within a moderate-income CT.

Product Innovation and Flexibility

The bank makes extensive use of flexible lending practices to serve AA credit needs.

Refer to the Other Loan Performance section under the Scope of the Evaluation section for additional details regarding other programs.

Minnesota Housing Finance Agency (MHFA)

MHFA offers the Start Up Program for first-time homebuyers, which is a first mortgage loan program with access to DPA and closing cost loans. Lenders originate and close loans under their individual underwriting and closing procedures. A master servicer purchases and securitizes closed loans originated by a lender under prescribed program requirements. Lenders are advised that underlying eligible product guidelines and master servicer requirements apply, which may be more restrictive than the Minnesota Housing guidelines. Over the course of the evaluation period, ONB originated 195 of these loans, totaling \$39.2 million within the state of Minnesota.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Mankato MSA is stronger than the bank's overall performance under the Lending Test in the full-scope area. The bank exhibited stronger performance in geographic and borrower distribution of loans. Performance in the Minnesota Non-MSA is consistent with the bank's performance in the full-scope AA. Performance in the limited-scope AAs had a neutral impact on the Lending Test rating. Neutral impact due to a significantly smaller percentage of loans in Minnesota.

Refer to Tables O through T in the state of Minnesota section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in state of Minnesota is rated Outstanding.

Based on a full-scope review, the bank's performance in the Minneapolis MSA is excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Minneapolis MSA	68	3,001	520	86,893	588	93.6	89,894	93.3	0	0
Mankato MSA	0	0	25	1,462	25	4.0	1,462	1.5	0	0
MN Non-MSA	0	0	7	4,667	7	1.1	4,667	4.8	0	0
Statewide	2	210	6	117	8	1.3	327	0.3	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.
 ** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Conclusions for Area Receiving a Full-Scope Review

Minneapolis MSA

The bank has an excellent level of qualified CD investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits excellent responsiveness to credit and community economic development needs. The bank makes significant use of innovative and/or complex investments to support CD initiatives.

ONB had 588 qualified CD investments and donations totaling \$89.9 million, which is equivalent to 22.3 percent of allocated tier 1 capital. The bank made 263 current period CD investments, which totaled \$85.6 million, and 257 qualified grants totaling \$1.3 million. Additionally, the AA benefitted from the ongoing impact of 68 prior period CD investments with an outstanding balance of \$3 million. The bank had no unfunded commitments. The bank's CD investments were responsive to affordable housing needs and community services to LMI communities in the AA. The investments consisted of \$66.4 million in MBS and \$18.6 in school bonds.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Mankato MSA and Minnesota non-MSA is consistent with the bank's overall performance under the Investment Test in the full-scope area.

SERVICE TEST

The bank's performance under the Service Test in the state of Minnesota is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Minneapolis MSA is good.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
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	Low	Mod	Mid	Upp
Minneapolis MSA	94.7	28	90.3	3.6	14.3	60.7	21.4	6.0	18.6	45.5	29.6
Mankato MSA	1.3	1	3.2	0.0	100.0	0.0	0.0	0.0	22.6	71.6	5.8
MN Non-MSA	4.0	2	6.5	0.0	0.0	100.0	0.0	0.0	0.0	100.0	0.0

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Minneapolis MSA	15	3	0	1	8	3
Mankato MSA	0	0	0	0	0	0
MN Non-MSA	3	1	0	0	2	0

During the pandemic, the bank offered additional services such as curbside banking, cashing stimulus checks for non-customers, and offering leniency on waiving non-sufficient funds and overdraft fees and early withdrawal penalties. With lobby closures, branch personnel worked to help meet community banking needs through drive-through facilities and digital banking services. The bank received positive consideration for these activities in response to the pandemic.

Minneapolis MSA

Service delivery systems are accessible to geographies and individuals of different income levels in the bank's AA.

The bank has 28 branches in the AA, with one in a low-income CT and four in moderate-income CTs. The percentage of the branch located in LMI areas is near the percentage of the population residing in the geographies.

To the extent changes have been made, the bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank opened a total of 15 branches in the AA. In April 2019, the bank opened 11 branches in middle-income CTs and three in upper-income CTs. In April 2020, the bank closed three branches in middle-income CTs. In May 2020, the bank opened a branch in a moderate-income CT.

The bank complements its traditional service delivery methods in the AA with certain alternative retail delivery systems, such as bill payment, deposit-taking ATMs, debit card, direct deposit, mobile banking, online banking, remote deposit service, and telephone banking.

ONB has 29 ATMs in the AA, of which five deposit-taking ATMs are in LMI CTs. We did not place significant weight on alternative delivery systems, as the bank did not maintain or provide metrics to determine their effectiveness in helping meet the needs of LMI individuals.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. All branches operate during similar banking hours.

Community Development Services

Minneapolis MSA

The bank is a leader in providing CD services.

CD services were effective and responsive in addressing the community's needs. During the evaluation period, 157 bank employees from various lines of business partnered with 73 organizations and contributed a total of 2,391 hours supporting LMI individuals and families. This included serving on committees and boards for 34 various organizations that promote affordable housing, community services, and economic developments for LMI communities within the AA.

The following are examples of CD services provided in this AA:

- 39 bank employees provided 543 hours of support to a nonprofit organization focused on youth development. The nonprofit's mission is to prepare students from LMI communities with business, career development, and financial literacy skills through hands-on experiences that inspire success in work and life. The employees provided financial education and mentoring to students, and an employee served as a board member.
- A bank employee provided 165 hours of board service to a nonprofit organization whose mission is to transform lives through affordable homeownership. Their programs build and sell homes to low-income families enabling them to grow and thrive in safe, affordable, and stable housing.
- Two employees provided 64 hours of board and committee support to a nonprofit organization which supports small business owners. The mission of the organization is to build wealth for LMI entrepreneurs across the city and surrounding communities.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Mankato MSA is consistent with the bank's overall performance under the Service Test in the full-scope area. The Minnesota non-MSA is weaker than the bank's overall performance based on the branch distribution in LMI CTs. The weaker performance did not have an impact on the bank's overall Service Test performance rating for the state.

State of Wisconsin

CRA rating for the State of Wisconsin⁹: Outstanding

The Lending Test is rated:	Outstanding
The Investment Test is rated:	High Satisfactory
The Service Test is rated:	High Satisfactory

The major factors that support this rating include:

- Lending levels reflect good responsiveness to community credit needs.
- The bank exhibits good geographic and borrower distribution of loans.
- The bank is a leader in making CD loans. CD lending had a significantly positive impact on the Lending Test rating.
- The bank has a significant level of qualified investments.
- The bank's service delivery systems are readily accessible to geographies and individuals of different income levels in its AAs.
- The bank is a leader in providing CD services.

Description of Institution's Operations in Wisconsin

ONB has six AAs within the state of Wisconsin. For purposes of this evaluation, the six AAs were combined and presented as four AAs, which are the Appleton-Oshkosh-Neenah CSA (Appleton CSA), Madison-Janesville-Beloit CSA (Madison CSA), Milwaukee-Racine-Waukesha CSA (Milwaukee CSA), and Wisconsin non-MSA. The bank delineated non-MSA AAs within the same state are combined and evaluated as the Wisconsin non-MSA. In 2019, the bank closed a branch in the Waukesha County within the Milwaukee CSA and a branch in the Waushara County within the Wisconsin non-MSA, which resulted in ONB exiting the counties.

Refer to Appendix A, Scope of Examination, for a list of counties within each AA. The AA complies with the regulation and does not arbitrarily exclude any LMI areas.

ONB has \$2.2 billion in deposits representing 11.1 percent of the total bank deposits. ONB operates 20 branches within the state representing 12.3 percent of total number of bank branches. The bank made 8.3 percent of its loan originations and purchases compared to total bank loans during the evaluation period in the state. The bank's primary loan products in the state of Wisconsin are home mortgages.

According to the FDIC deposit market share data, ONB had a 1.3 percent market share making it the 10th largest deposit holder out of 205 financial institutions in the state. The bank operates 20 branches and 20 deposit-taking ATMs within the state.

⁹ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Madison-Janesville-Beloit CSA

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

Table A – Demographic Information of the Assessment Area						
Assessment Area: Madison-Janesville-Beloit CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	145	3.4	20.7	45.5	26.2	4.1
Population by Geography	670,925	3.6	16.0	49.1	28.6	2.7
Housing Units by Geography	288,835	3.1	17.0	50.1	28.0	1.8
Owner-Occupied Units by Geography	166,854	0.8	12.1	54.5	32.6	0.0
Occupied Rental Units by Geography	108,105	6.7	23.7	44.0	21.3	4.3
Vacant Units by Geography	13,876	3.6	23.1	45.4	24.6	3.2
Businesses by Geography	47,530	2.3	15.6	47.0	33.2	1.9
Farms by Geography	2,166	0.7	5.7	53.4	39.9	0.3
Family Distribution by Income Level	164,277	19.5	17.0	22.4	41.1	0.0
Household Distribution by Income Level	274,959	22.9	16.8	18.4	41.9	0.0
Median Family Income MSA - 27500 Janesville-Beloit, WI MSA		\$60,820	Median Housing Value			\$212,587
Median Family Income MSA - 31540 Madison, WI MSA		\$81,321	Median Gross Rent			\$906
			Families Below Poverty Level			7.8%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The bank's AA has 145 CTs, which includes five low-income, 30 moderate-income, 66 middle-income, 38 upper-income, and six NA-income. The AA complies with the regulation and does not arbitrarily exclude any LMI areas.

The bank operates 12 branches and 12 deposit-taking ATMs within the AA.

Housing Characteristics

Conditions in the housing market make it challenging for home buyers as demand exceeds housing supply and prices continue to trend upwards. The lack of affordable housing has made it difficult for LMI families to purchase homes and to rent housing in the AA.

The AA is a high cost housing area, limiting access to affordable home ownership among LMI borrowers. The 2021 FFIEC AMFI in the AA is \$99,000. According to Realtor.com data, the median housing value in the AA is \$341,950 and \$389,900 in January 2019 and December 2021, respectively, reflecting a 14 percent increase.

Assuming a 30-year mortgage with a 5 percent interest rate and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower

making \$49,500 per year (or less than 50 percent of the 2021 FFIEC AMFI in the AA) could afford a \$230,524 mortgage with a payment of \$1,238 per month. A moderate-income borrower making \$79,200 per year (or less than 80 percent of the 2021 FFIEC AMFI in the AA) could afford a \$368,838 mortgage with a payment of \$1,980 per month. This illustrates that LMI borrowers would be challenged to qualify for a mortgage loan in the AA.

Community Contacts

The OCC made three community contacts in the AA during the evaluation period, which included a nonprofit organization focused on economic development in LMI areas and two county agencies. Community contacts indicated that the following are identified needs within the bank's AA:

- Home mortgages in LMI areas and for senior citizens
- Home improvement loans
- Financing to owners of multifamily building due to the lack of affordable rental properties
- Commercial/industrial land purchase and construction loans
- Small loans to small businesses, specifically start-ups
- Small loans to farms for operational and equipment
- Funding to nonprofit organizations

Scope of Evaluation in Wisconsin

For the state of Wisconsin, the Madison CSA received a full-scope review. The Madison CSA represents 44.7 percent of total bank deposits, 60 percent of total bank branches, and 58.3 percent of loan originations and purchases within the rating area. The Appleton CSA, Milwaukee CSA, and Wisconsin non-MSA received limited-scope reviews.

Due to the branch closures in the Milwaukee CSA and Wisconsin non-MSA, these AAs were evaluated differently. In evaluating the geographic distribution and borrower income criteria under the Lending Test for HMDA and CRA, data was analyzed over two analysis periods. The OCC evaluated data for 2019 and 2020 through 2021 due to changes to the AA. In evaluating the bank's performance under the Lending Test, we placed greater weight on the 2020 through 2021 analysis period than the 2019 as it represents the more recent production within the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF WISCONSIN

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Madison CSA is excellent.

Lending Activity

Lending levels reflect good responsiveness to credit needs in the state of Wisconsin.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Appleton CSA	790	145	0	5	940	16.1	9.2
Madison MSA	2,422	555	5	14	2,996	51.4	44.7
Milwaukee CSA	1,120	401	1	12	1,534	26.3	41.2
WI Non-MSA	317	35	1	1	354	6.1	4.9
Statewide	--	--	--	4	4	0.1	--

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.
"--" data not available.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State*	%State Deposits
Appleton CSA	122,484	7,355	0	7,919	137,758	8.7	9.2
Madison MSA	757,389	53,686	75	40,100	851,250	53.6	44.7
Milwaukee CSA	373,606	89,360	282	74,715	537,963	33.9	41.2
WI Non-MSA	51,347	1,961	3	1,893	55,204	3.5	4.9
Statewide	--	--	--	5,644	5,644	0.4	--

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.
"--" data not available.

Madison CSA

According to FDIC Deposit Market Share data, ONB had \$972.9 million in deposits in the Madison CSA. The bank had a 3.7 percent deposit market share summary in the AA. The bank's deposit market share ranked 12th out of 43 deposit-taking institutions in the AA. The bank's deposit market share ranked in the top 27.9 percent of all deposit-taking institutions in the AA.

According to 2021 peer mortgage data, ONB had a 1.8 percent market share of HMDA loan originations in the Madison MSA. The bank's market share of HMDA loan originations was well below their deposit market share in the AA. The bank's market share of HMDA loan originations ranked tenth out of 480 lenders in the AA. The bank's market share ranking of HMDA loan originations was in the top 2.1 percent of all HMDA lenders. The bank's market share ranking of HMDA loan originations was stronger than their deposit market share ranking.

According to 2020 peer small business data, ONB had a 2.8 percent market share of small business loan originations. The bank's market share of small business loan originations was below their deposit market share. The bank's market share of small business loan originations ranked 11th out of 142 small business lenders in the AA. The bank's market share ranking of small business loan originations ranked in the top 7.7 percent of all small business lenders in the AA. The bank's market share ranking of small business loan originations was stronger than their deposit market share ranking.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AAs.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects an excellent distribution.

Refer to Table O in the state of Wisconsin 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.

Madison CSA

The geographic distribution of home mortgage loans is excellent. The proportion of loans in low-income geographies exceeded the percentage of owner-occupied housing and the aggregate industry distribution of loans to those geographies. The proportion of loans to moderate-income geographies is below the percentage of owner-occupied housing and exceeded the aggregate industry distribution of loans to those geographies.

Small Loans to Businesses

The geographic distribution of small business loans reflects an adequate distribution.

Refer to Table Q in the state of Wisconsin 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.

Madison CSA

The geographic distribution of small business loans is adequate. The proportion of loans in low-income geographies was below the percentage of businesses and the aggregate industry distribution of loans to those geographies. The proportion of loans in moderate-income geographies was well below the percentage of businesses and the aggregate industry distribution of loans to those geographies.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed the bank's lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

The distribution of home mortgage loans among individuals of different income levels is excellent.

Refer to Table P in the state of Wisconsin 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 proportion of loans to low-income borrowers was below the percentage of families and exceeded the aggregate distribution of loans to those borrowers. The proportion of loans to moderate-income borrowers exceeded the percentage of families and the aggregate distribution of loans to those borrowers.

Small Loans to Businesses

The distribution of loans to businesses of different sizes is poor.

Refer to Table R in the state of Wisconsin 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 proportion of loans to businesses with revenues less than \$1 million was significantly below the percentage of businesses and below the aggregate industry distribution of loans to those businesses.

Community Development Lending

The bank is a leader in making CD loans. CD loans had a significantly positive impact on the Lending Test rating.

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

Throughout the evaluation period, ONB made 14 loans totaling \$40.1 million in the Madison CSA. CD loans volume was equivalent to 39.6 percent of allocated tier 1 capital. CD loans were responsive to community affordable housing needs and economic development. Additionally, the bank responded to the community needs for revitalization and stabilization.

Examples of CD loans the bank made in the AA include:

- \$22 million loan that supports the revitalization of the community. The loan proceeds were made in conjunction with a municipal redevelopment plan, located in a TIF district in a moderate-income CT.
- \$4.2 million loan to cash-out and refinance a 76-unit multifamily affordable housing complex. The project has monthly rents below HUD's affordable fair market rents threshold.
- \$4 million loan to support economic development within the AA. The loan is through the SBA 504 program. Proceeds will be used to refinance equipment.

Product Innovation and Flexibility

The bank makes extensive use of flexible lending practices in order to serve AA credit needs.

Refer to the Other Loan Performance section under the Scope of the Evaluation section for additional details regarding other programs.

Wisconsin Housing and Economic Development Authority (WHEDA)

WHEDA Advantage provides homebuyers with a versatile loan that features low monthly mortgage payments, low down payment requirements, and closing cost assistance. Over the course of the evaluation period, ONB originated 199 of these loans totaling \$31.7 million within the state of Wisconsin.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s performance under the Lending Test in the Wisconsin non-MSA is consistent with the bank’s performance in the full-scope AA. The performance in the Appleton CSA and Milwaukee CSA is weaker than the bank’s overall performance under the Lending Test in the full-scope area. The bank exhibited weaker performance in geographic and borrower distribution of loans. Performance in the limited-scope AAs had a neutral impact on the Lending Test rating. Neutral impact due to a significantly smaller percentage of loans in Wisconsin.

Refer to Tables O through V in the state of Wisconsin section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank’s performance under the Investment Test in state of Wisconsin is rated High Satisfactory.

Based on a full-scope review, the bank’s performance in the Madison MSA is good.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Appleton CSA	9	385	43	2,875	52	15.9	3,260	9.9	0	0
Madison CSA	45	3,989	126	19,164	171	52.3	23,153	70.4	0	0
Milwaukee CSA	14	568	81	5,598	95	29.1	6,166	18.7	0	0
WI Non-MSA	0	0	1	285	1	0.3	285	0.9	0	0
Statewide	0	0	8	43	8	2.4	43	0.1	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.
 ** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Conclusions for Area Receiving a Full-Scope Review

Madison CSA

The bank has an excellent level of qualified CD investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits adequate responsiveness to credit and community economic development needs. The bank makes significant use of innovative and/or complex investments to support CD initiatives.

ONB had 171 qualified CD investments and donations totaling \$23.2 million, which is equivalent to 22.8 percent of allocated tier 1 capital. The bank made 33 current period CD investments, which totaled \$18.6 million, and 93 qualified grants totaling \$606,800. Additionally, the AA benefitted from the ongoing impact of 45 prior period CD investments with an outstanding balance of \$3.9 million. The bank had no unfunded commitments. The bank's CD investments were responsive to affordable housing needs and community services to LMI communities in the AA.

The investments consisted of \$10.1 million in LIHTC and \$8.4 million in MBS. The bank complemented its investments with \$79,195 of in-kind contributions:

- \$75,000 in several computers and equipment to a nonprofit organization. The mission of the organization is to make information technology accessible and affordable through education and services for nonprofit organizations and LMI individuals with barriers.
- \$4,195 in furniture to a nonprofit organization for their administrative offices. The mission of the organization is to change lives in LMI communities and build hope through simple, decent homeownership in partnership with volunteers and community support.

Conclusions for Areas Receiving a Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Appleton CSA and Milwaukee CSA are consistent with the bank's overall performance under the Investment Test in the full-scope area. The Wisconsin non-MSA is weaker than the bank's overall performance under the Investment Test in the full-scope area. The performance is based on the excellent level of qualified CD investment and grants, which had a neutral impact on the bank's overall Investment Test performance rating for the state.

SERVICE TEST

The bank's performance under the Service Test in the state of Wisconsin is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Madison CSA is good.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
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	Low	Mod	Mid	Upp
Appleton CSA	9.2	3	15.0	0.0	66.7	33.3	0.0	0.0	14.7	71.1	14.2
Madison CSA	44.7	12	60.0	0.0	25.0	58.3	16.7	3.6	16.0	49.1	28.6
Milwaukee CSA	41.2	4	20.0	0.0	25.0	75.0	0.0	24.8	20.6	36.0	18.3
WI Non-MSA	4.9	1	5.0	0.0	100.0	0.0	0.0	0.0	5.5	70.5	24.0

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Appleton CSA	0	1	0	0	-1	0
Madison CSA	0	6	0	0	-5	-1
Milwaukee CSA	1	2	0	0	1	-2
WI Non-MSA	0	1	0	0	-1	0

During the pandemic, the bank offered additional services such as curbside banking, cashing stimulus checks for non-customers, and offering leniency on waiving non-sufficient funds and overdraft fees and early withdrawal penalties. With lobby closures, branch personnel worked to help meet community banking needs through drive-through facilities and digital banking services. The bank received positive consideration for these activities in response to the pandemic.

Madison CSA

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank's AA.

The bank has 12 branches in the AA, with none in low-income CTs and three in moderate-income CTs. The percentage of the branch located in LMI areas is below the percentage of the population residing in the geographies.

To the extent changes have been made, the bank's closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank did not open branches during the evaluation period. In April 2020, the bank closed five branches in middle-income CTs and a branch in an upper-income CT.

The bank complements its traditional service delivery methods in the AA with certain alternative retail delivery systems, such as bill payment, deposit-taking ATMs, debit card, direct deposit, mobile banking, online banking, remote deposit service, and telephone banking.

ONB has 12 ATMs in the AA, of which four deposit-taking ATMs are in moderate-income CTs. We did not place significant weight on alternative delivery systems, as the bank did not maintain or provide metrics to determine their effectiveness in helping meet the needs of LMI individuals.

Services, including business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. All branches operate during similar banking hours.

Community Development Services

Madison CSA

The bank is a leader in providing CD services.

CD services were effective and responsive in addressing the community's needs. During the evaluation period, 83 bank employees from various lines of business partnered with 65 organizations and contributed a total of 1,932 hours supporting LMI individuals and families. This included serving on committees and boards for 23 various organizations that promote affordable housing, community services, and economic developments for LMI communities within the AA.

Refer to the Other Performance section under the Scope of the Evaluation section for additional details regarding the bank's CD services.

The following are examples of CD services provided in this AA:

- Several bank employees provided 96 hours of board service and volunteerism to a nonprofit organization whose mission is to transform lives through affordable homeownership. Their programs build and sell homes to low-income families enabling them to grow and thrive in safe, affordable, and stable housing.
- Two employees provided 71 hours of board service, financial education, and technical assistance to a nonprofit corporation. The organization is dedicated to an increase in affordable housing in the AA by making a low interest, deferred payment loan to be used for the down payment and/or closing costs associated with the purchase of a home to LMI households.
- An employee provided 24 hours of board and loan committee service to a city entity focus on economic development. The agency administers a revolving loan program to applicants seeking to make improvements to buildings they own or operate within the city. Eligible activities include façade renovation, creation and improvement of residential units, and investments in commercial tenant spaces.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the bank's performance under the Service Test in the Milwaukee CSA is consistent with the bank's overall performance under the Service Test in the full-scope area. Appleton CSA and Wisconsin non-MSA are stronger than the bank's overall performance under the Service Test in the full-scope area. The stronger performance is based on the branch distribution in LMI CTs. The stronger performance did not have an impact on the bank's overall Service Test performance rating for the state.

Appendix A: Scope of Examination

The following table identifies the 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:	HMDA and CRA: 01/01/19 to 12/31/21 CD Activities & Retail Services: 01/01/19 to 12/31/21	
Bank Products Reviewed:	Home mortgage, small business, small farm, consumer loans CD loans, qualified investments, CD services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
ONB Community Equity, LLC Downtown Evansville Growth Fund, LLC ONB Foundation, Inc (ONBF)	Subsidiaries	CD Investments
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		
Evansville IN-KY MMSA	Full-Scope	Counties of Posey, Vanderburgh, Warrick in IN, and Henderson in KY
Louisville-Jefferson County KY-IN MMSA	Full-Scope	Counties of Jefferson in KY and Clarksville in IN
South Bend-Elkhart-Mishawaka IN-MI CSA	Full-Scope	Counties of Elkhart, Kosciusko, St. Joseph in IN, and Berrien in MI
State of Illinois		
Danville MSA	Full-Scope	Vermilion County
State of Indiana		
Bloomington-Bedford CSA	Limited-Scope	Counties of Lawrence and Monroe
Fort Wayne MSA	Limited-Scope	Allen County
Indianapolis-Carmel-Muncie CSA	Full-Scope	Counties of Bartholomew, Boone, Delaware, Hamilton, Hendricks, Jackson, Jennings, Johnson, Madison, Marion, and Putnam
Lafayette-West Lafayette MSA	Limited-Scope	Tippecanoe County
Terre Haute MSA	Limited-Scope	Counties of Parke*, Vermillion, and Vigo
IN Non-MSA	Full-Scope	Counties of Daviess, Dubois, Fountain, Gibson, Knox, Martin, Orange, Perry, Randolph, and Spencer
State of Kentucky		
Lexington-Fayette MSA	Limited-Scope	Fayette County
Owensboro MSA	Limited-Scope	Daviess County
KY Non-MSA	Full-Scope	Counties Hopkins, Muhlenberg, and Union

State of Michigan		
Detroit-Warren-Ann Arbor CSA	Full-Scope	Counties of Lenawee, Livingston, Monroe, and Washtenaw
Grand Rapids-Kentwood-Muskegon CSA	Limited-Scope	Counties of Kent and Ottawa
Jackson MSA	Limited-Scope	Jackson County
Kalamazoo-Battle Creek-Portage MSA	Full-Scope	Counties of Calhoun and Kalamazoo
State of Minnesota		
Mankato MSA	Limited-Scope	Blue Earth County
Minneapolis-St. Paul-Bloomington MSA	Full-Scope	Counties of Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, Sherburne, Washington, and Wright
MN Non-MSA	Limited-Scope	Counties of Chippewa and Lac Qui Parle
State of Wisconsin		
Appleton-Oshkosh-Neenah CSA	Limited-Scope	Counties of Outagamie and Winnebago
Madison-Janesville-Beloit MSA	Full-Scope	Counties of Rock and Dane
Milwaukee-Racine-Waukesha CSA	Limited-Scope	Counties of Milwaukee, Walworth, and Waukesha*
WI Non-MSA	Limited-Scope	Counties of Portage and Waushara

*Exited the County in April 2020

Appendix B: Summary of MMSA and State Ratings

Old National Bank Ratings				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank Rating
ONB	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
MMSA:				
Evansville IN-KY MMSA	Outstanding	Outstanding	High Satisfactory	Outstanding
Louisville-Jefferson County KY-IN MMSA	Low Satisfactory	Outstanding	Low Satisfactory	Satisfactory
South Bend-Elkhart-Mishawaka IN-MI CSA	High Satisfactory	High Satisfactory	Outstanding	Satisfactory
State:				
State of Illinois	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
State of Indiana	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
State of Kentucky	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
State of Michigan	Outstanding	High Satisfactory	High Satisfactory	Outstanding
State of Minnesota	Low Satisfactory	Outstanding	High Satisfactory	Satisfactory
State of Wisconsin	Outstanding	High Satisfactory	High Satisfactory	Outstanding

(*) 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 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 LMI 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): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, 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 §1003.2 of this title, and that is not an excluded transaction under §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 investments, and branch distribution).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

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: 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.

MMSA (state): 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.

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

Rating Area: A rated area is a state or multi-state 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 multi-state metropolitan statistical area, the institution will receive a rating for the multi-state 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.

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/assessment area. 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 O. 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 P. 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/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - 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 compared 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 assessment area.
- Table R. 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.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography - 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 compared 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 assessment area.

Table T. 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 thousand) 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.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

MMSA

Evansville IN-KY MMSA

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	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		
Evansville MMSA	2,486	401,089	66.4	16,886	5.7	3.3	3.5	13.6	11.8	12.9	48.2	39.7	44.5	32.4	45.1	39.0	0.1	0.2	0.1		
Total	2,486	401,089	66.4	16,886	5.7	3.3	3.5	13.6	11.8	12.9	48.2	39.7	44.5	32.4	45.1	39.0	0.1	0.2	0.1		

Source: 2015 ACS; 01/01/2019 - 01/01/2021 Bank Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Evansville MMSA	2,486	401,089	66.4	16,886	21.3	10.2	11.7	17.6	17.2	20.9	20.6	19.0	19.8	40.4	39.5	23.7	0.0	14.0	23.9		
Total	2,486	401,089	66.4	16,886	21.3	10.2	11.7	17.6	17.2	20.9	20.6	19.0	19.8	40.4	39.5	23.7	0.0	14.0	23.9		

Source: 2015 ACS ; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2019-2021**

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	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Evansville MMSA	2,609	373,417	72.6	5,220	8.5	10.6	8.5	20.1	23.7	21.4	38.3	30.8	37.8	29.0	29.7	28.3	4.1	5.3	4.0
Total	2,609	373,417	72.6	5,220	8.5	10.6	8.5	20.1	23.7	21.4	38.3	30.8	37.8	29.0	29.7	28.3	4.1	5.3	4.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2019-2021**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Evansville MMSA	2,609	373,417	72.6	5,220	83.8	29.1	32.9	4.9	25.0	11.2	46.0
Total	2,609	373,417	72.6	5,220	83.8	29.1	32.9	4.9	25.0	11.2	46.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019-2021		
Assessment Area:	Total Loans to Farms				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		
Evansville MMSA	62	6,009	100.0	220	3.5	0.0	0.0	8.9	1.6	5.9	55.5	62.9	78.2	31.5	35.5	15.9	0.5	0.0	0.0		
Total	62	6,009	100.0	220	3.5	0.0	0.0	8.9	1.6	5.9	55.5	62.9	78.2	31.5	35.5	15.9	0.5	0.0	0.0		

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2019-2021	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans		
Evansville MMSA	62	6,009	95.4	220	98.0	61.3	62.7	0.9	16.1	1.0	22.6		
Total	62	6,009	95.4	220	98.0	61.3	62.7	0.9	16.1	1.0	22.6		

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Louisville-Jefferson County KY-IN MMSA

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	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	491	175,722	13.1	50,507	5.2	1.8	3.1	17.3	5.3	14.2	39.7	26.5	38.1	37.7	65.6	44.4	0.1	0.8	0.1		
Total	491	175,722	13.1	50,507	5.2	1.8	3.1	17.3	5.3	14.2	39.7	26.5	38.1	37.7	65.6	44.4	0.1	0.8	0.1		

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Louisville MMSA	491	175,722	13.1	50,507	22.4	2.0	9.8	17.9	10.6	21.7	19.7	14.1	20.1	40.0	68.2	31.8	0.0	5.1	16.7		
Total	491	175,722	13.1	50,507	22.4	2.0	9.8	17.9	10.6	21.7	19.7	14.1	20.1	40.0	68.2	31.8	0.0	5.1	16.7		

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2019-2021**

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	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Louisville MMSA	290	56,992	8.1	19,968	8.2	14.8	7.7	17.2	4.8	15.7	30.9	24.1	29.6	39.7	47.6	42.3	4.0	8.6	4.7
Total	290	56,992	8.1	19,968	8.2	14.8	7.7	17.2	4.8	15.7	30.9	24.1	29.6	39.7	47.6	42.3	4.0	8.6	4.7

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2019-2021**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Louisville MMSA	290	56,992	8.1	19,968	87.5	19.0	35.7	4.2	19.0	8.3	62.1
Total	290	56,992	8.1	19,968	87.5	19.0	35.7	4.2	19.0	8.3	62.1

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

South Bend-Elkhart-Mishawaka IN-MI CSA

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	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 CSA	765	150,395	20.4	36,054	3.3	1.8	1.9	12.5	9.8	9.8	54.0	45.5	56.1	30.2	42.9	32.2	0.0	0.0	0.0		
Total	765	150,395	20.4	36,054	3.3	1.8	1.9	12.5	9.8	9.8	54.0	45.5	56.1	30.2	42.9	32.2	0.0	0.0	0.0		

*Source: 2015 ACS ; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
South Bend CSA	765	150,395	20.4	36,054	20.3	6.1	9.4	17.3	13.1	20.7	21.4	17.3	21.5	41.1	59.0	35.4	0.0	4.6	13.1		
Total	765	150,395	20.4	36,054	20.3	6.1	9.4	17.3	13.1	20.7	21.4	17.3	21.5	41.1	59.0	35.4	0.0	4.6	13.1		

*Source: 2015 ACS ; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2019-2021**

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	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
South Bend CSA	694	135,368	19.3	12,022	7.1	5.8	5.9	15.1	17.0	13.1	51.7	52.2	54.4	26.1	25.1	26.6	0.0	0.0	0.0
Total	694	135,368	19.3	12,022	7.1	5.8	5.9	15.1	17.0	13.1	51.7	52.2	54.4	26.1	25.1	26.6	0.0	0.0	0.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2019-2021**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
South Bend CSA	694	135,368	19.3	12,022	84.3	25.8	32.3	5.1	30.5	10.6	43.7
Total	694	135,368	19.3	12,022	84.3	25.8	32.3	5.1	30.5	10.6	43.7

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

State of Illinois

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	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
Danville MSA	93	6,696	100.0	1,681	2.8	1.1	1.1	11.4	3.2	4.1	49.6	31.2	49.4	36.2	64.5	45.4	0.0	0.0	0.0
Total	93	6,696	100.0	1,681	2.8	3.7	1.1	11.4	4.5	4.1	49.6	31.2	49.4	36.2	64.5	45.4	0.0	0.0	0.0

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Danville MSA	93	6,696	100.0	1,681	21.7	3.2	5.8	16.8	21.5	19.0	20.7	22.6	23.6	40.8	50.5	33.5	0.0	2.2	18.1
Total	93	6,696	100.0	1,681	21.7	3.2	5.8	16.8	21.5	19.0	20.7	22.6	23.6	40.8	50.5	33.5	0.0	2.2	18.1

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2019-2021**

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	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Danville MSA	105	11,208	100.0	786	3.9	4.8	3.3	23.2	28.6	19.8	42.4	42.9	43.3	30.4	23.8	33.6	0.0	0.0	0.0
Total	105	11,208	100.0	786	3.9	4.8	3.3	23.2	28.6	19.8	42.4	42.9	43.3	30.4	23.8	33.6	0.0	0.0	0.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2019-2021**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Danville MSA	105	11,208	100.0	786	77.3	22.9	30.4	5.4	19.0	17.3	58.1
Total	105	11,208	100.0	786	77.3	22.9	30.4	5.4	19.0	17.3	58.1

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

State of Indiana

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	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		
Bloomington CSA	1,144	222,176	12.6	8,396	2.1	2.8	1.9	8.5	6.2	10.6	59.6	42.4	54.0	29.8	48.5	33.6	0.0	0.2	0.0		
Fort Wayne MSA	602	126,595	6.6	22,078	6.7	0.7	2.3	15.1	6.8	13.2	42.0	23.9	39.5	36.1	68.3	44.9	0.1	0.5	0.1		
IN Non-MSA	1,531	191,202	16.9	8,667	0.0	0.0	0.0	6.0	3.1	5.3	69.1	63.0	67.3	24.9	33.9	27.4	0.0	0.0	0.0		
Indianapolis CSA	4,144	811,451	45.7	130,255	6.2	2.7	4.7	18.8	11.0	15.2	36.5	33.9	33.4	38.3	52.1	46.5	0.1	0.3	0.2		
Lafayette MSA	768	125,196	8.5	8,969	1.1	1.0	1.0	16.2	15.0	14.2	35.3	33.3	33.6	47.3	50.5	51.0	0.1	0.4	0.2		
Terre Haute (2019)	274	24,161	3.0	3,244	3.4	0.4	1.7	15.7	12.4	12.0	47.4	48.9	47.9	33.6	38.3	38.4	0.0	0.0	0.0		
Terre Haute (2020-2021)	596	76,275	6.6	4,071	3.9	1.8	2.4	14.9	8.9	12.1	42.1	41.6	43.1	39.0	47.7	42.3	0.0	0.0	0.0		
Total	9,059	1,577,056	100.0	185,680	5.2	1.9	3.8	16.3	8.9	14.2	41.9	39.7	36.8	36.6	49.2	45.0	0.1	0.2	0.1		

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Bloomington CSA	1,144	222,176	12.6	8,396	21.2	7.6	6.1	16.8	14.7	17.2	20.6	18.4	21.4	41.4	54.9	37.8	0.0	4.4	17.6
Fort Wayne MSA	602	126,595	6.6	22,078	20.7	2.7	8.9	17.9	8.3	21.5	21.8	15.9	21.0	39.6	62.0	32.6	0.0	11.1	15.9
IN Non-MSA	1,531	191,202	16.9	8,667	17.4	8.7	7.8	17.9	20.4	20.8	22.4	21.6	22.4	42.4	42.2	30.1	0.0	7.1	18.9
Indianapolis CSA	4,144	811,451	45.7	130,255	22.4	6.9	8.5	17.4	15.2	19.0	19.5	19.3	20.3	40.6	53.6	34.1	0.0	5.0	18.2
Lafayette MSA	768	125,196	8.5	8,969	20.5	9.2	8.3	15.7	17.1	19.3	23.0	21.4	22.0	40.8	48.0	34.7	0.0	4.3	15.6
Terre Haute MSA (2019)	274	24,161	3.0	3,244	21.3	7.7	7.3	19.1	17.5	18.7	20.3	21.5	22.2	39.3	45.6	35.3	0.0	7.7	16.4
Terre Haute MSA (2020-2021)	596	76,275	6.6	4,071	21.3	7.9	7.1	18.6	15.4	17.9	20.1	23.0	20.5	40.1	47.3	34.9	0.0	6.4	19.7
Total	9,059	1,577,056	100.0	185,680	21.5	7.2	8.4	17.4	15.8	19.3	20.3	19.6	20.6	40.7	51.7	33.9	0.0	5.7	17.8

*Source: 2015 ACS ; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2019-2021

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	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Bloomington CSA	899	91,273	11.5	2,861	4.8	3.7	5.0	20.9	17.1	21.7	42.9	46.8	42.4	30.2	32.1	30.8	1.2	0.2	0.1
Fort Wayne MSA	867	121,632	11.1	7,067	8.5	8.0	7.3	19.4	19.0	18.6	34.1	34.7	35.9	33.7	31.5	32.7	4.4	6.8	5.5
IN Non-MSA	1,437	139,300	18.3	4,195	0.0	0.0	0.0	7.9	3.5	6.3	68.1	70.8	66.5	24.1	25.7	27.2	0.0	0.0	0.0
Indianapolis CSA	3,604	462,894	46.0	41,883	11.0	8.0	7.9	22.3	19.6	18.9	30.1	29.4	31.1	36.3	42.5	41.8	0.3	0.5	0.3
Lafayette MSA	474	54,522	6.1	2,584	4.2	4.2	3.6	28.3	35.2	33.6	27.5	18.4	26.4	36.1	40.3	33.9	3.9	1.9	2.5
Terre Haute MSA (2019)	104	15,849	1.3	1,699	9.9	7.7	9.5	25.2	22.1	18.4	43.7	40.4	39.4	21.3	29.8	32.7	0.0	0.0	0.0
Terre Haute MSA (2020-2021)	447	51,203	5.7	1,916	8.1	10.1	12.3	21.7	20.4	19.2	33.9	37.4	34.1	36.4	32.2	34.5	0.0	0.0	0.0
Total	7,832	936,673	100.0	62,205	9.5	5.6	6.9	21.3	17.1	18.8	33.4	39.6	34.5	34.9	36.5	38.8	1.0	1.2	1.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2019-2021**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Bloomington CSA	899	91,273	11.5	2,861	86.6	23.8	25.0	3.7	24.2	9.7	51.9
Fort Wayne MSA	867	121,632	11.1	7,067	85.9	36.8	34.4	4.6	28.5	9.5	34.7
IN Non-MSA	1,437	139,300	18.3	4,195	83.3	34.1	30.1	4.3	17.9	12.5	48.0
Indianapolis CSA	3,604	462,894	46.0	41,883	88.7	29.2	36.1	3.5	20.6	7.7	50.2
Lafayette MSA	474	54,522	6.1	2,584	86.1	28.7	37.7	3.5	21.5	10.4	49.8
Terre Haute MSA (2019)	104	15,849	1.3	1,699	85.6	60.6	42.1	3.9	32.7	10.4	6.7
Terre Haute MSA (2021-2021)	447	51,203	5.7	1,916	80.9	26.8	32.1	5.1	18.6	14.0	54.6
Total	7,832	936,673	100.0	62,205	87.9	30.4	35.0	3.7	21.5	8.4	48.1

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019-2021		
Assessment Area:	Total Loans to Farms				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		
Bloomington CSA	12	2,105	1.1	47	1.4	8.3	4.3	5.9	0.0	6.4	65.0	66.7	74.5	27.4	25.0	14.9	0.2	0.0	0.0		
Fort Wayne MSA	1	340	0.1	176	4.1	0.0	1.1	11.1	0.0	1.1	46.9	100.0	62.5	36.8	0.0	35.2	1.1	0.0	0.0		
IN Non-MSA	1,005	111,608	90.8	1,039	0.0	0.0	0.0	1.7	1.0	0.6	65.9	79.6	72.0	32.5	19.4	27.4	0.0	0.0	0.0		
Indianapolis CSA	69	8,469	6.2	626	6.3	0.0	1.0	16.0	7.2	3.7	43.8	73.9	67.9	33.7	18.8	27.3	0.1	0.0	0.2		
Lafayette MSA	6	949	0.5	95	1.8	0.0	0.0	13.3	33.3	3.2	35.9	50.0	54.7	49.0	16.7	42.1	0.0	0.0	0.0		
Terre Haute MSA (2019)	0	0	0.0	267	--	0.0	0.0	--	0.0	10.9	--	0.0	52.4	--	0.0	36.7	--	0.0	0.0		
Terre Haute MSA (2020-2021)	14	1,062	1.3	170	2.9	0.0	0.0	9.0	0.0	2.9	38.6	64.3	30.6	49.5	35.7	66.5	0.0	0.0	0.0		
Total	1,107	124,533	100.0	2,420	4.3	0.1	0.5	11.8	1.6	1.9	49.4	78.9	69.1	34.3	19.4	28.5	0.2	0.0	0.1		

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2019-2021**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Bloomington CSA	12	2,105	1.1	47	97.8	75.0	51.1	1.6	8.3	0.5	16.7
Fort Wayne MSA	2	412	0.2	176	97.1	100.0	55.7	1.4	0.0	1.5	0.0
IN Non-MSA	1,005	111,608	89.1	1,039	98.2	66.8	66.0	1.1	12.6	0.7	20.6
Indianapolis CSA	69	8,469	6.1	626	96.9	68.1	57.3	1.8	7.2	1.4	24.6
Lafayette MSA	6	949	0.5	95	96.9	100.0	45.3	1.6	0.0	1.5	0.0
Terre Haute MSA (2019)	20	2,217	1.8	267	98.3	95.0	78.3	0.8	5.0	0.8	0.0
Terre Haute MSA (2020-2021)	14	1,062	1.2	170	97.6	57.1	68.8	1.1	14.3	1.3	28.6
Total	1,128	126,822	100.0	2,420	97.2	67.2	61.0	1.6	12.2	1.2	20.7

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

State of Kentucky

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	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
KY Non-MSA	600	57,819	39.5	2,713	0.0	0.0	0.0	2.4	0.8	2.6	68.3	69.2	57.1	29.3	30.0	40.3	0.0	0.0	0.0
Lexington MSA	267	89,650	17.6	17,649	6.3	3.0	4.6	16.2	5.6	14.6	35.2	28.5	32.8	42.3	62.9	48.0	0.0	0.0	0.0
Owensboro MSA	653	106,490	43.0	4,902	1.8	1.1	1.0	18.1	14.2	16.3	50.9	53.0	51.4	29.2	32.0	31.2	0.0	0.0	0.0
Total	1,520	253,959	100.0	25,264	3.9	0.9	3.4	13.6	7.4	13.6	45.9	55.1	39.0	36.6	36.6	43.9	0.0	0.0	0.0

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
KY Non-MSA	600	57,819	39.5	2,713	19.0	4.7	3.4	14.2	14.7	14.1	19.9	23.0	21.0	47.0	54.8	41.1	0.0	2.8	20.3
Lexington MSA	267	89,650	17.6	17,649	23.3	2.2	7.0	15.7	9.7	18.3	18.3	16.1	19.8	42.6	68.5	39.5	0.0	3.4	15.5
Owensboro MSA	653	106,490	43.0	4,902	21.8	7.0	7.4	17.7	18.7	19.0	19.7	20.8	22.6	40.8	45.3	34.8	0.0	8.1	16.2
Total	1,520	253,959	100.0	25,264	22.1	5.3	6.7	15.8	15.5	17.9	18.9	20.9	20.5	43.1	53.2	38.8	0.0	5.2	16.1

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2019-2021**

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	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
KY Non-MSA	330	38,008	39.1	1,016	0.0	0.0	0.0	5.9	0.9	6.1	60.7	78.2	53.6	33.4	20.9	40.3	0.0	0.0	0.0
Lexington MSA	133	20,082	15.7	8,529	7.8	6.8	8.0	16.1	3.8	15.2	39.8	45.9	40.5	36.2	43.6	36.2	0.0	0.0	0.0
Owensboro MSA	382	41,799	45.2	1,984	2.8	1.8	2.8	28.7	31.2	27.4	41.0	40.6	40.3	27.5	26.4	29.4	0.0	0.0	0.0
Total	845	99,889	100.0	11,529	6.2	1.9	6.4	17.0	15.0	16.5	42.3	56.1	41.7	34.6	27.0	35.4	0.0	0.0	0.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2019-2021**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
KY Non-MSA	330	38,008	39.1	1,016	81.0	35.2	39.1	4.3	14.2	14.7	50.6
Lexington MSA	133	20,082	15.7	8,529	87.1	18.0	40.3	3.8	24.8	9.1	57.1
Owensboro MSA	382	41,799	45.2	1,984	83.7	35.1	40.9	4.7	17.3	11.7	47.6
Total	845	99,889	100.0	11,529	85.9	32.4	40.3	4.0	17.3	10.1	50.3

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2019-2021**

Assessment Area:	Total Loans to Farms				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
KY Non-MSA	99	10,560	83.2	146	0.0	0.0	0.0	1.8	0.0	0.7	68.4	94.9	66.4	29.8	5.1	32.9	0.0	0.0	0.0
Lexington MSA	2	42	1.7	81	6.9	0.0	4.9	10.0	0.0	4.9	43.3	100.0	46.9	39.9	0.0	43.2	0.0	0.0	0.0
Owensboro MSA	18	1,007	15.1	259	0.2	0.0	0.0	11.3	0.0	2.7	51.1	27.8	54.4	37.4	72.2	42.9	0.0	0.0	0.0
Total	119	11,609	100.0	486	4.1	0.0	0.8	8.7	0.0	2.5	49.8	84.9	56.8	37.4	15.1	39.9	0.0	0.0	0.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2019-2021**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
KY Non-MSA	99	10,560	83.2	146	97.7	49.5	54.8	0.8	29.3	1.5	21.2
Lexington MSA	2	42	1.7	81	95.8	50.0	55.6	2.5	0.0	1.6	50.0
Owensboro MSA	18	1,007	15.1	259	98.4	55.6	64.9	1.1	0.0	0.5	44.4
Total	119	11,609	100.0	486	96.7	50.4	60.3	1.9	24.4	1.4	25.2

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

State of Michigan

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	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 CSA	1,374	240,745	27.5	28,825	0.2	0.0	0.0	7.3	7.2	6.3	63.8	55.5	61.8	28.7	37.3	31.9	0.0	0.0	0.0
Grand Rapids CSA	2,866	757,836	57.4	58,537	2.0	0.9	2.1	12.3	7.1	12.9	53.4	38.9	51.2	32.4	53.1	33.9	0.0	0.0	0.0
Jackson MSA	191	32,827	3.8	7,462	5.7	1.0	3.2	15.6	13.1	14.9	53.7	45.6	53.1	25.0	40.3	28.7	0.0	0.0	0.0
Kalamazoo MSA	559	113,415	11.2	19,316	5.0	3.4	3.0	14.7	12.2	13.4	47.8	37.0	46.7	32.5	47.2	36.9	0.1	0.2	0.1
Total	4,990	1,144,823	100.0	114,140	2.4	0.9	1.8	11.7	7.9	11.4	55.0	43.5	53.2	30.8	47.6	33.5	0.0	0.1	0.0

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Detroit CSA	1,374	240,745	27.5	28,825	16.3	8.3	7.9	17.8	15.6	20.3	22.0	22.0	25.0	43.9	48.8	33.3	0.0	5.2	13.4
Grand Rapids CSA	2,866	757,836	57.4	58,537	19.1	3.4	8.3	17.6	13.2	21.4	22.2	19.9	23.4	41.2	61.1	35.4	0.0	2.4	11.6
Jackson MSA	191	32,827	3.8	7,462	22.3	5.8	6.7	17.5	19.9	19.2	20.2	20.9	23.4	40.0	50.3	35.8	0.0	3.1	14.9
Kalamazoo MSA	559	113,415	11.2	19,316	20.9	7.0	9.1	17.0	16.1	21.2	19.8	20.0	23.5	42.2	49.4	34.9	0.0	7.5	11.3
Total	4,990	1,144,823	100.0	114,140	19.0	5.2	8.2	17.5	14.5	20.9	21.5	20.5	23.8	41.9	56.0	34.8	0.0	3.8	12.2

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2019-2021

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	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Detroit CSA	668	93,337	30.0	7,998	0.2	0.0	0.2	13.3	15.9	12.1	57.6	57.9	57.9	28.9	26.2	29.8	0.0	0.0	0.0
Grand Rapids CSA	1,007	183,643	45.2	20,063	3.4	2.5	3.6	14.3	14.7	14.3	47.6	36.4	48.1	34.8	46.4	34.0	0.0	0.0	0.0
Jackson MSA	83	7,608	3.7	1,876	8.9	3.6	10.1	27.3	36.1	28.6	42.4	28.9	38.9	21.3	31.3	22.5	0.1	0.0	0.0
Kalamazoo MSA	472	71,381	21.2	5,507	8.3	8.9	8.0	21.7	22.0	22.5	41.6	37.1	40.9	28.0	31.8	28.6	0.4	0.2	0.1
Total	2,230	355,969	100.0	35,444	3.9	3.1	3.9	16.3	17.4	15.8	48.4	42.7	48.7	31.3	36.7	31.6	0.1	0.0	0.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2019-2021

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Detroit CSA	668	93,337	30.0	7,998	86.9	31.9	42.8	4.4	26.2	8.7	41.9
Grand Rapids CSA	1,007	183,643	45.2	20,063	83.8	28.5	35.7	6.4	32.5	9.8	39.0
Jackson MSA	83	7,608	3.7	1,876	82.4	25.3	42.0	6.3	20.5	11.4	54.2
Kalamazoo MSA	472	71,381	21.2	5,507	81.7	25.8	35.4	6.1	23.5	12.2	50.6
Total	2,230	355,969	100.0	35,444	84.0	28.8	37.6	5.9	28.3	10.1	42.9

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2019-2021

Assessment Area:	Total Loans to Farms				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
Detroit CSA	21	1,256	65.6	316	0.1	0.0	0.0	3.1	0.0	0.6	69.9	61.9	73.1	27.0	38.1	26.3	0.0	0.0	0.0
Grand Rapids CSA	2	454	8.7	277	1.1	0.0	1.1	6.9	0.0	3.2	56.1	50.0	64.3	35.9	50.0	31.4	0.0	0.0	0.0
Jackson MSA	0	0	0.0	56	1.6	0.0	0.0	8.9	0.0	10.7	66.1	0.0	64.3	23.5	0.0	25.0	0.0	0.0	0.0
Kalamazoo MSA	9	289	28.1	118	3.1	0.0	0.0	11.6	0.0	5.1	57.1	88.9	72.9	28.1	11.1	22.0	0.2	0.0	0.0
Total	32	1,999	100.0	767	1.2	0.0	0.4	6.7	0.0	3.0	61.7	68.8	69.2	30.4	31.3	27.4	0.0	0.0	0.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2019-2021

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Detroit CSA	21	1,256	65.6	316	97.0	66.7	54.7	1.9	4.8	1.1	28.6
Grand Rapids CSA	2	454	6.3	277	93.9	100.0	38.3	4.5	0.0	1.5	0.0
Jackson MSA	--	--	--	56	98.4	--	25.0	0.9	--	0.7	--
Kalamazoo MSA	9	289	28.1	118	93.7	77.8	35.6	4.1	11.1	2.2	11.1
Total	32	1,999	100.0	767	95.3	71.9	43.7	3.3	6.3	1.4	21.9

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

State of Minnesota

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	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		
Mankato MSA	49	6,985	1.1	2,905	0.0	0.0	0.0	12.0	24.5	13.0	80.1	73.5	80.9	7.9	2.0	6.1	0.0	0.0	0.0		
Minneapolis MSA	4,169	1,425,420	96.5	229,863	2.2	1.3	2.4	14.5	6.4	13.1	48.9	48.6	48.3	34.3	43.7	36.1	0.1	0.0	0.1		
MN Non-MSA	101	8,871	2.3	552	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0		
Total	4,319	1,441,276	100.0	233,320	2.1	1.2	2.3	14.4	6.5	13.1	49.8	50.1	48.9	33.6	42.2	35.6	0.1	0.0	0.1		

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Mankato MSA	49	6,985	1.2	2,905	20.9	12.2	8.5	17.6	18.4	24.0	22.9	18.4	22.9	38.5	34.7	29.0	0.0	16.3	15.6		
Minneapolis MSA	4,169	1,425,420	96.5	229,863	20.2	7.7	8.7	17.2	16.8	21.0	22.0	20.6	21.6	40.5	48.2	31.8	0.0	6.7	16.9		
MN Non-MSA	101	8,871	2.3	552	20.7	15.8	10.0	15.2	26.7	21.6	22.7	17.8	24.5	41.4	31.7	26.8	0.0	7.9	17.2		
Total	4,319	1,441,276	100.0	233,320	20.2	7.9	8.7	17.2	17.1	21.1	22.0	20.5	21.6	40.5	47.7	31.8	0.0	6.9	16.9		

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2019-2021**

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	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Mankato MSA	103	18,185	1.5	964	0.0	0.0	0.0	26.8	33.0	30.4	68.1	67.0	64.0	5.1	0.0	5.6	0.0	0.0	0.0
Minneapolis MSA	6,372	1,008,121	95.1	71,363	5.1	2.4	4.8	16.6	13.7	15.7	45.1	47.3	44.9	33.0	36.4	34.4	0.3	0.0	0.2
MN Non-MSA	222	12,155	3.3	392	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	6,697	1,038,461	100.0	72,719	4.9	2.3	4.7	16.7	13.6	15.8	45.7	49.4	45.5	32.4	34.7	33.8	0.3	0.0	0.2

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2019-2021**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Mankato MSA	103	18,185	1.5	964	81.9	28.2	42.7	5.6	27.2	12.5	44.7
Minneapolis MSA	6,372	1,008,121	95.1	71,363	88.2	26.9	45.5	4.4	28.4	7.4	44.6
MN Non-MSA	222	12,155	3.3	392	78.8	48.2	30.4	6.2	4.1	15.0	47.7
Total	6,697	1,038,461	100.0	72,719	88.1	27.7	45.4	4.4	27.6	7.5	44.7

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2019-2021**

Assessment Area:	Total Loans to Farms				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
Mankato MSA	6	529	1.1	91	0.0	0.0	0.0	4.5	0.0	0.0	77.7	100.0	82.4	17.8	0.0	17.6	0.0	0.0	0.0
Minneapolis MSA	143	10,961	26.1	498	1.9	0.0	0.8	10.9	0.7	2.6	54.6	67.1	65.1	32.5	32.2	31.5	0.1	0.0	0.0
MN Non-MSA	398	47,180	72.8	433	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	547	58,670	100.0	1,022	1.7	0.0	0.4	10.0	0.2	1.3	58.2	91.4	81.4	30.1	8.4	16.9	0.0	0.0	0.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2019-2021**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Mankato MSA	6	529	1.1	91	96.3	50.0	27.5	2.5	0.0	1.2	50.0
Minneapolis MSA	143	10,961	26.1	498	96.3	74.8	51.4	2.1	8.4	1.5	16.8
MN Non-MSA	398	47,180	72.8	433	98.9	70.9	48.3	0.7	9.0	0.4	20.1
Total	547	58,670	100.0	1,022	96.5	71.7	47.9	2.1	8.8	1.5	19.6

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

State of Wisconsin

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	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
Appleton CSA	790	122,484	18.4	20,496	0.0	0.0	0.0	10.9	10.0	10.3	72.1	66.1	72.2	17.0	23.9	17.6	0.0	0.0	0.0
Madison MSA	2,422	757,389	56.3	46,722	0.8	1.4	0.8	12.1	10.2	10.0	54.5	56.2	53.7	32.6	32.1	35.4	0.0	0.3	0.1
Milwaukee CSA (2019)	342	95,527	8.0	54,005	8.2	3.2	4.1	13.4	7.0	11.0	34.1	26.0	33.3	44.3	63.7	51.6	0.0	0.0	0.0
Milwaukee CSA (2020-2021)	474	159,052	11.0	48,728	12.7	5.7	7.1	19.3	10.8	17.6	43.3	48.9	46.0	24.7	34.6	29.4	0.0	0.0	0.0
WI Non-MSA (2019)	103	12,194	2.4	2,881	0.0	0.0	0.0	2.2	1.9	2.7	76.8	73.8	77.4	21.0	24.3	19.9	0.0	0.0	0.0
WI Non-MSA (2020-2021)	170	31,359	4.0	2,825	0.0	0.0	0.0	3.1	4.1	4.1	67.3	59.4	64.2	29.6	36.5	31.6	0.0	0.0	0.0
Total	4,301	1,178,005	100.0	175,657	0.5	1.1	0.6	11.7	10.1	10.1	60.9	58.6	59.3	26.9	30.1	30.0	0.0	0.2	0.1

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Appleton CSA	790	122,484	18.4	20,496	18.8	11.1	9.2	18.7	20.4	22.0	24.1	25.4	23.4	38.4	40.4	31.9	0.0	2.7	13.5		
Madison MSA	2,422	757,389	56.3	46,722	19.5	10.3	7.0	17.0	23.3	20.2	22.4	25.3	24.9	41.1	37.4	38.3	0.0	3.7	9.6		
Milwaukee CSA (2019)	342	95,527	8.0	54,005	25.0	9.6	7.0	16.4	11.7	17.7	19.0	19.3	22.2	39.7	56.4	41.3	0.0	2.9	11.9		
Milwaukee CSA (2020-2021)	474	159,052	11.0	48,728	31.2	11.4	8.4	17.9	18.1	20.5	18.6	22.2	22.3	32.3	42.6	33.8	0.0	5.7	15.0		
WI Non-MSA (2019)	103	12,194	2.4	2,881	15.6	6.8	5.1	19.5	17.5	15.6	23.6	23.3	21.9	41.4	51.5	38.3	0.0	1.0	19.2		
WI Non-MSA (2020-2021)	170	31,359	4.0	2,825	14.3	4.1	4.9	18.5	19.4	16.8	23.3	25.3	23.5	43.9	48.2	40.9	0.0	2.9	14.0		
Total	4,301	1,178,005	100.0	175,657	19.2	10.5	7.7	17.6	22.6	20.8	23.0	25.3	24.4	40.2	38.1	36.4	0.0	3.4	10.8		

Source: 2015 ACS ; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2019-2021**

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	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Appleton CSA	145	7,355	14.3	5,647	0.0	0.0	0.0	14.9	12.4	14.3	69.7	60.7	67.9	15.3	26.9	17.8	0.0	0.0	0.0
Madison MSA	555	53,686	54.8	9,798	2.3	1.6	1.9	15.6	9.6	15.8	47.0	49.2	46.2	33.2	38.7	34.7	1.9	0.9	1.4
Milwaukee CSA (2019)	67	25,739	6.6	26,330	12.7	6.0	8.9	13.2	11.9	11.4	33.8	41.8	33.7	40.2	40.3	45.9	0.1	0.0	0.0
Milwaukee CSA (2020-2021)	218	37,524	21.5	19,419	18.5	10.1	15.8	17.9	12.8	17.2	38.2	50.0	40.0	25.2	27.1	27.0	0.2	0.0	0.1
WI Non-MSA (2019)	1	48	0.5	1,089	0.0	0.0	0.0	2.8	0.0	2.1	77.2	100.0	77.0	20.0	0.0	20.9	0.0	0.0	0.0
WI Non-MSA (2020-2021)	27	1,656	2.7	846	0.0	0.0	0.0	3.7	0.0	3.1	70.2	81.5	70.2	26.1	18.5	26.7	0.0	0.0	0.0
Total	1,013	126,008	100.0	63,129	1.6	1.3	1.2	15.4	10.1	15.3	53.5	51.6	54.1	28.1	36.3	28.5	1.3	0.7	0.9

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2019-2021

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Appleton CSA	145	7,355	14.3	5,647	77.1	31.0	39.0	7.6	9.7	15.3	59.3
Madison MSA	555	53,686	54.8	9,798	81.8	28.8	37.6	6.1	13.0	12.1	58.2
Milwaukee CSA (2019)	67	25,739	6.6	26,330	85.9	32.8	47.3	5.4	64.2	8.6	3.0
Milwaukee CSA (2020-2021)	218	37,524	21.5	19,419	81.9	23.4	38.2	6.8	27.1	11.3	49.5
WI Non-MSA (2019)	1	48	0.1	1,089	83.7	100.0	46.7	4.8	0.0	11.5	0.0
WI Non-MSA (2020-2021)	27	1,656	2.7	846	79.8	22.2	36.1	6.1	0.0	14.1	77.8
Total	1,013	126,008	100.0	63,129	80.5	29.3	38.1	6.5	12.3	13.0	58.4

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2019-2021

Assessment Area:	Total Loans to Farms				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
Appleton CSA	0	0	0.0	196	0.0	0.0	0.0	9.7	0.0	8.7	75.0	0.0	78.6	15.3	0.0	12.8	0.0	0.0	0.0
Madison MSA	5	75	71.4	320	0.7	0.0	0.0	5.7	0.0	1.6	53.4	60.0	50.9	39.9	40.0	47.5	0.3	0.0	0.0
Milwaukee CSA (2019)	0	0	0.0	198	7.2	0.0	2.5	8.4	0.0	2.5	31.8	0.0	40.4	52.6	0.0	54.5	0.1	0.0	0.0
Milwaukee CSA (2020-2021)	1	282	14.3	126	12.0	0.0	0.8	11.7	0.0	2.4	41.8	0.0	55.6	34.4	100.0	41.3	0.1	0.0	0.0
WI Non-MSA (2019)	0	0	0.0	100	0.0	0.0	0.0	0.4	0.0	1.0	83.9	0.0	77.0	15.7	0.0	22.0	0.0	0.0	0.0
WI Non-MSA (2020-2021)	1	3	14.3	50	0.0	0.0	0.0	0.6	0.0	0.0	77.6	100.0	56.0	21.8	0.0	44.0	0.0	0.0	0.0
Total	7	360	100.0	990	0.5	0.0	0.0	6.8	0.0	4.3	59.6	57.1	61.4	32.9	42.9	34.3	0.2	0.0	0.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2019-2021	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Appleton CSA	--	--	--	196	96.1	--	36.2	2.9	--	1.0	--	
Madison MSA	5	75	71.4	320	95.8	20.0	40.3	2.4	20.0	1.8	60.0	
Milwaukee CSA (2019)	--	--	--	198	94.1	--	62.6	4.1	--	1.8	--	
Milwaukee CSA (2020-2021)	1	282	14.3	126	95.5	0.0	56.3	2.8	100.0	1.7	0.0	
WI Non-MSA (2019)	--	--	--	100	93.0	--	33.0	5.8	--	1.1	--	
WI Non-MSA (2020-2021)	1	3	14.3	50	94.7	100.0	40.0	4.7	0.0	0.6	0.0	
Total	7	360	100.0	990	95.9	28.6	38.8	2.5	28.6	1.6	42.9	

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%