Washington, DC 20219

# PUBLIC DISCLOSURE

August 12, 2024

# **COMMUNITY REINVESTMENT ACT** PERFORMANCE EVALUATION

First Financial Bank, National Association Charter Number: 47

> One First Financial Plaza Terre Haute, IN 47808

Office of the Comptroller of the Currency

Central Ohio – Indiana Office 8777 Purdue Road, Suite 105 Indianapolis, IN 46268

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 First Financial Bank, National Association (FFB or bank) with respect to the Lending, Investment, and Service Tests:

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

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

The major factors that support this rating include:

- The Lending Test rating is based on a combination of multistate metropolitan statistical area (MMSA) and state rating areas. The primary factor in the High Satisfactory Lending Test was the performance in the states of Indiana and Illinois, which have the largest deposit and lending activity.
- The Investment Test rating is based on a combination of MMSA and state rating areas. The primary factor in the Low Satisfactory Investment Test was the performance in the states of Indiana and Illinois.
- The Service Test rating is based on a combination of MMSA and state rating areas. The primary factor in the High Satisfactory rating was the performance in the states of Indiana and Illinois.
- FFB offered several innovative and flexible loan programs that focused on making home ownership affordable and promoting small businesses, which had a positive impact on the bank's lending performance. Additionally, the bank showed responsiveness to the credit needs of its borrowers during the COVID-19 pandemic by participating in the Small Business Administration's (SBA) Paycheck Protection Program (PPP).

# **Lending in Assessment Area**

A substantial majority of the bank's loans are in its assessment areas (AA).

The bank originated and purchased 85.6 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										
Number of Loans					Dollar	Amount	of Loans \$(	(000s)		
Inside Outs		Outsi	de		Insid	Inside		Outside		
#	%	#	%	#	\$	%	\$	%	\$(000s)	
3,985	85.3	685	14.7	4,670	397,851	67.5	191,124	32.5	588,975	
2,881	84.2	539	15.8	3,420	301,517	74.1	105,337	25.9	406,854	
1,283	89.9	144	10.1	1,427	147,314	90.5	15,467	9.5	162,781	
8,149	85.6	1,368	14.4	9,517	846,682	73.1	311,928	26.9	1,158,610	
	Insid # 3,985 2,881 1,283	Number  Inside  # % 3,985 85.3 2,881 84.2 1,283 89.9	Number of Loans  Inside Outsi # % #  3,985 85.3 685  2,881 84.2 539  1,283 89.9 144	Number of Loans           Inside         Outside           #         %         #         %           3,985         85.3         685         14.7           2,881         84.2         539         15.8           1,283         89.9         144         10.1	Number of Loans           Inside         Outside         Total           #         %         #         %           3,985         85.3         685         14.7         4,670           2,881         84.2         539         15.8         3,420           1,283         89.9         144         10.1         1,427	Number of Loans         Total Inside           Inside         Outside         #         S           3,985         85.3         685         14.7         4,670         397,851           2,881         84.2         539         15.8         3,420         301,517           1,283         89.9         144         10.1         1,427         147,314	Number of Loans         Dollar Amount of Inside           Inside         Outside         #         %         #         %           3,985         85.3         685         14.7         4,670         397,851         67.5           2,881         84.2         539         15.8         3,420         301,517         74.1           1,283         89.9         144         10.1         1,427         147,314         90.5	Number of Loans           Inside         Outside         Total         Inside         Outside           #         %         #         %         \$         %         \$           3,985         85.3         685         14.7         4,670         397,851         67.5         191,124           2,881         84.2         539         15.8         3,420         301,517         74.1         105,337           1,283         89.9         144         10.1         1,427         147,314         90.5         15,467	Number of Loans           Inside         Outside         Total #         Inside         Outside         Inside         Outside           #         %         #         %         \$         %         \$         %           3,985         85.3         685         14.7         4,670         397,851         67.5         191,124         32.5           2,881         84.2         539         15.8         3,420         301,517         74.1         105,337         25.9           1,283         89.9         144         10.1         1,427         147,314         90.5         15,467         9.5	

Source: Bank Data for 2021, 2022, and 2023. Due to rounding, totals may not equal 100%.

# **Description of Institution**

FFB is a federally chartered national bank headquartered in Terre Haute, Indiana. FFB is the oldest national bank in Indiana and the fifth oldest in the United States.

FFB is a wholly owned subsidiary of First Financial Corporation (FFC), also headquartered in Terre Haute, Indiana. As of December 31, 2023, FFC had \$4.9 billion in total assets. FFC is a publicly traded corporation on the NASDAQ stock exchange under the symbol "THFF." FFB has two investment subsidiaries, Portfolio Management Specialist A and Portfolio Management Specialist B. Portfolio Management Specialist A owns Portfolio Management Specialist B. Both A & B own Global Portfolio Ltd. Portfolio Management Specialist B owns the Real Estate Invest Trust (REIT), First Financial Real Estate LLC. The REIT, Global Portfolio, and Portfolio Management Specialist B hold assets directly. Total assets held are \$1 billion. FFB acquired two affiliates in the Heritage Bank acquisition, JBMM, LLC and Fort Webb LP, LLC. JBMM LLC holds, manages, and disposes of Heritage's foreclosed assets. Fort Webb LP, LLC is an affordable housing community development (CD) investment. The subsidiary and affiliate activities are not considered in the bank's Community Reinvestment Act (CRA) performance.

FFC acquired Hancock Bancorp, Inc. and its banking subsidiary, Hancock Bank and Trust Company (total assets of \$334 million with seven branches), on August 10, 2021, with the acquisition completed on November 5, 2021. As part of this acquisition, the bank added two counties to the Kentucky rating area, Breckinridge and Hopkins County, which are in the Kentucky Non-MSA. Additionally, the bank expanded into the Owensboro MSA and Bowling Green MSA as part of this acquisition. Historically, growth has been through acquisitions of smaller community banks.

FFB is a multistate bank that operated 70 branches (including six remote drive ups) and 98 automated teller machines (ATMs) (64 ATMs were full-service deposit-taking) as of December 31, 2023. FFB has 14 AAs located in Illinois, Indiana, Kentucky, and Tennessee. Following the acquisition of Hancock Bancorp, Inc. in November 2021, the bank expanded from 82 branches to 88 banking centers in west-central Indiana, east-central Illinois, Kentucky, and Tennessee. During the evaluation period, the bank closed 18 branches due to declining customer usage. FFB closed six branches in Illinois, nine in Indiana, two in Kentucky, and one in Tennessee as discussed in the Service Test section for each rating area.

The bank's market strategy is to provide a traditional mix of loan and deposit products, as well as asset management services. There are no material differences in products or services offered at the branches. FFB offers a full range of agricultural loans, business loans, conventional mortgages, home improvement loans, and consumer loans. They also offer Federal Housing Administration (FHA), United States (U.S.) Department of Veteran Affairs (VA), and U.S. Department of Agriculture (USDA) Rural Housing Service (RHS) loans. In addition to the bank's branch network and ATMs, the bank offers internet banking, mobile banking, banking by telephone, and banking by mail. The bank's goal is to be the premier financial services organization and provide the highest quality customer service in their market areas.

As of December 31, 2023, the bank had total assets of \$4.8 billion and tier 1 capital of \$521.2 million, with net loans and leases representing 64.6 percent of total assets. As of December 31, 2023, the bank reported total loans of \$3.2 billion, representing 65.5 percent of total assets. As of the December 31, 2023, Consolidated Report of Condition and Income (Call Report), the loan portfolio (based on gross loans) consisted of 21.9 percent residential real estate loans (home mortgage including multifamily), 45 percent commercial and industrial and commercial real estate loans (business loans), 20.8 percent consumer loans, 8.5 percent agricultural loans, and 3.8 percent other loans. During the evaluation period, FFB sold approximately \$216.7 million home mortgage loans to the secondary market. According to the June 30, 2023, Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, FFB had total deposits of \$4.1 billion.

There were no legal, financial, or other factors impeding FFB's ability to help meet the credit needs in its AAs during the evaluation period. The bank received a "Satisfactory" rating on its previous CRA Performance Evaluation dated July 6, 2021.

# **Scope of the Evaluation**

#### **Evaluation Period/Products Evaluated**

This performance evaluation assesses FFB's record of meeting the credit and CD needs of its entire community, including low- and moderate-income areas. The Office of the Comptroller of the Currency (OCC) used large bank CRA evaluation procedures to assess the bank's performance under the Lending, Investment, and Service Tests during the evaluation period, January 1, 2021, to December 31, 2023. For the Lending Test, examiners evaluated home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA) and small loans to businesses and small loans to farms reported under the CRA for 2021, 2022, and 2023, as well as CD lending activities. Due to an insufficient number of loans originated in several AAs, some loan products were not analyzed in those full-scope AAs as these loan products were not considered a primary product in those AAs. Examiners did not analyze small loans to farms in the Clarksville MMSA, Bloomington MSA (IL), Evansville MSA (IN), Bowling Green MSA (KY), and Nashville MSA (TN). Examiners also did not analyze home mortgage lending in the Evansville MSA and small loans to businesses in the Nashville MSA.

The Investment Test considers the bank's responsiveness to CD needs in each AA through qualified investments, grants, and donations. The OCC also considered the complexity and innovativeness of the investments, the responsiveness of the investments to CD needs, and the bank's demonstrated leadership.

The Service Test considers both retail services and CD services. For retail services, the geographic distribution of the bank's branches among low-, moderate-, middle-, and upper-income geographies along with the impact of branch openings and closings were given the most weight. Additionally, the Service Test considers the availability and effectiveness of alternative delivery systems (ADS) for delivering retail banking services including ATMs, online banking, and mobile banking. The level and responsiveness of CD services was also evaluated. Bank and branch deposit data was as of June 30, 2023, based on information from the FDIC. The distribution of bank branches was compared to 2020 U.S. Census population estimates.

The bank's primary lending products are home mortgage, small loans to businesses (small business lending), and small loans to farms (small farm lending). Consumer loans were not considered in this evaluation as consumer lending did not constitute a substantial majority of the bank's lending. Bank management did not request consideration of consumer loans.

This evaluation period included two census periods. In evaluating the geographic distribution and borrower income criteria under the Lending Test for the HMDA and CRA data, examiners compared the bank's lending performance with demographic data from the 2015 American Community Survey (ACS) for 2021 home mortgage loans, the 2020 U.S. Census for 2022 and 2023 home mortgage loans, and 2021, 2022, and 2023 Dun and Bradstreet (D&B) data for small loans to businesses and small loans to farms. Two sets of tables are included in Appendix D for each census period. Refer to the Scope of the Evaluation section under each state section for any changes to the AAs during the evaluation period.

In certain rating areas, FFB made CD loans to, or purchased CD investments in organizations, projects, or funds that benefit the broader statewide or regional areas (BSRA) that include the bank's AA(s). These CD loans or investments receive consideration at the rating area (State) level and may positively impact the overall Lending Test or Investment Test rating. CD loans and investments to or in entities with a purpose, mandate, or function that includes serving the bank's AA(s) receive full consideration. CD loans and investments to entities in the BSRA without a purpose, mandate, or function that includes serving the bank's AA(s) receive consideration only if the bank has been responsive to CD needs and opportunities within its AA(s).

#### **Selection of Areas for Full-Scope Review**

In each state where the bank has an office, one or more AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA) and multistate metropolitan statistical area (MMSA) 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 below and to appendix A, Scope of Examination, for a list of full- and limited-scope AAs, including the counties within each AA.

During the evaluation period, FFB delineated 14 AAs located in Illinois, Indiana, Kentucky, and Tennessee. The OCC completed full-scope reviews for the following AAs:

- Terre Haute, IN MSA 45460 (Terre Haute MSA)
- Indianapolis, IN MSA 26900 (Indianapolis MSA)
- Evansville, IN MSA 21780 (Evansville MSA)
- Bloomington, IL 14010 (Bloomington MSA)

- Illinois Non-MSA (IL Non-MSA)
- Bowling Green, KY MSA 14540 (Bowling Green MSA)
- Kentucky Non-MSA (KY Non-MSA)
- Nashville-Davidson-Murfreesboro-Franklin, TN 34980 (Nashville MSA)
- Clarksville, TN-KY MMSA 17300 (Clarksville MMSA).

The OCC completed limited-scope reviews for the following AAs:

- Indiana Non-MSA (IN Non-MSA)
- Danville, IL 19180 (Danville MSA)
- Champaign-Urbana, IL 16580 (Champaign MSA)
- Owensboro, KY MSA 36980 (Owensboro MSA)
- Tennessee Non-MSA (TN Non-MSA)

# **Ratings**

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

For the overall conclusions, the OCC gave the most weight to the state of Indiana. The state of Indiana represented FFB's largest market with the most deposits, lending activity, and branches. By number of loans originated inside the AAs, Indiana represented 68.4 percent of the total home mortgage, small business, and small farm loan originations. The state of Indiana held 57 percent of total deposits and 31.4 percent (22 branches) of total branches. The bank's main office is headquartered in the Terre Haute MSA in Indiana, with FFB ranked first in deposit market share out of eight financial institutions in this AA with 51.9 percent of the deposit market share, according to the FDIC's Deposit Market Share Report as of June 30, 2023. Based on number of loans originated, the state of Illinois is ranked second in loan originations, with 19.8 percent of total home mortgage, small business, and small farm loan originations during the evaluation. The state of Illinois held 22.4 percent of total deposits as of the FDIC's Deposit Market Share Report as of June 30, 2023.

The OCC based conclusions for the Lending Test on loan products weighted in accordance with their relative volume. As a result, examiners placed more weight on home mortgage and small business lending, with 49.1 percent of total originations as home mortgage, 35.9 percent as small business, and 15 percent as small farm loan originations during the evaluation period based on number of loans. Small farm lending was a new loan offering to the acquired AAs as the former institutions did not provide small farm/agricultural loan products. Additionally, the bank experienced a lack of small farm loan originations in several metropolitan areas due to strong competition with the USDA Farm Service Agency (FSA) and USDA Rural Development offices located in the bank's footprint. These government programs may offer extended loan terms beyond FFB's loan policies.

The MMSA and state ratings are based on performance in all bank AAs within those areas. 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 Information

#### Flexible and Innovative Lending Products

The bank's innovative and flexible loan product offerings include both bank-developed and government-sponsored programs that help meet the credit needs of low- and moderate-income borrowers. Although products provided through the federal or state governments are not necessarily innovative, the loan products provide flexibility to consumers and businesses seeking financing. A summary of FFB's innovative and/or flexible loan products or programs offered include the following programs listed below. These programs were considered in this evaluation and had a positive impact on the bank's overall lending performance. Refer to the Product Innovation and Flexibility section in the Lending Test section of each MMSA or state for additional information, as applicable. The loans from the programs below are included in the totals for home mortgage loans and small loans to businesses, as applicable.

FFB makes use of bank-wide flexible loan programs to help low- and moderate-income borrowers achieve homeownership through programs that provide reduced down payment options and lower closing costs through FHA, RHS/FSA, VA, and Freddie Mac Home Possible programs. During the review period, the bank originated 90 FHA loans totaling \$14.1 million. The bank originated 41 RHS/FSA loans totaling \$5.2 million. The bank originated 21 VA loans totaling \$3.7 million. The bank originated 42 Freddie Mac Home Possible loans totaling \$4.1 million.

During the evaluation period, the bank offered two new loan programs to assist low- and moderate-income individuals with home mortgage loans. The bank developed the Low- to Moderate-Income Portfolio Product to assist first time home buyers. Additionally, the bank was a participating lender in the United Way of the Wabash Valley's Home Down Payment Assistance Program (UW loans). Household income must be less than 80 percent of the area median income limits, as established by the federal government, to qualify under this program. In 2023, the bank originated six Low- to Moderate-Income Portfolio Product loans totaling \$736,000 in Indiana and Illinois and two UW loans totaling \$124,955 in Indiana.

The bank is an SBA approved lender. FFB provides guarantees for small business loans through programs such as SBA 504, SBA 7(a) and SBA Express. The bank helped various small businesses through the participation in these SBA programs. During the evaluation period, the bank originated 13 traditional SBA loans totaling \$2.2 million.

Refer to the Product Innovation and Flexibility section in the Lending Test section of each MMSA or state for additional information, as applicable.

#### COVID-19 Response

Beginning in early 2020, the global economy was adversely affected by the COVID-19 pandemic, which spread worldwide and caused deteriorating economic conditions resulting from stay-at-home orders and businesses shutting down to lessen the spread and impact of the virus. FFB responded to customers facing financial hardship during the pandemic by participating in the SBA's PPP, which provided small and mid-sized businesses impacted by the pandemic with funds to cover payroll costs and other expenses. The bank received positive consideration for its response to the COVID-19 pandemic in 2021 through the origination of loans via the SBA PPP, which helped to stabilize small businesses and

communities in the AAs and statewide areas. The bank originated 1,631 PPP loans totaling \$66.1 million in 2021 in its AAs. The bank originated 15 PPP loans totaling \$2.4 million in the regional and nationwide area. Nationwide loans were not given consideration in this evaluation.

#### Other Services

FFB provides a financial literacy initiative on its website available to anyone to assist in navigating financial education and planning, planning for home ownership, responsible credit and protecting yourself from fraud including product selection to meet financial needs and goals, understanding a credit report, home tool kit, and how to avoid foreclosure. The home ownership section is provided in English and Spanish.

During 2021 in Terre Haute, Indiana, FFB sponsored "First Free Fare Friday" that allowed residents to travel on bus routes free of charge. There were several branch locations along the bus transit routes for customers to perform transactions and conduct financial business. Of the bus stops, 54 percent were in low- and moderate-income areas and within walking distance of five branches and 15 ATMs.

# **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 Consumer Financial Protection Bureau, as applicable.

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

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

# **Multistate Metropolitan Statistical Area Rating**

# Clarksville, TN-KY MMSA

CRA rating for the Clarksville, TN-KY MMSA<sup>1</sup>: Satisfactory

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

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending activity levels reflect excellent responsiveness to community credit needs.
- The bank exhibits a good geographic distribution of loans in its AA and an adequate distribution of loans among individuals of different income levels and businesses of different sizes. FFB did not originate any CD loans during the evaluation period in the Clarksville MMSA.
- FFB has a significant level of qualified CD investments and grants.
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's AA. The bank provides an adequate level of CD services.

# Description of Institution's Operations in Clarksville, TN-KY MMSA

The Clarksville, TN-KY MMSA 17300 (Clarksville MMSA) is comprised of the counties of Christian and Trigg in Kentucky and Montgomery in Tennessee. In the analysis of this rating area, examiners took into consideration that there are four geographies in the AA designated as federal land, the Fort Campbell military base and the Land Between the Lakes National Recreational Area. Refer to appendix A for a complete list of counties included in the AA.

As of December 31, 2023, FFB had seven branches and five ATMs, with one full-service ATM. Three branches and ATMs are in moderate-income geographies and one branch and ATM is in a low-income geography. During the evaluation period, the bank originated or purchased \$40.6 million in home mortgage loans, small loans to businesses, and small loans to farms inside the Clarksville MMSA, which represented 4.8 percent of the total loan originations inside all AAs. By number of loans, FFB made 272 home mortgage loans, small loans to businesses, and small loans to farms inside the Clarksville MMSA, which represented 3.3 percent of the total originations inside all AAs. In the Clarksville MMSA, home mortgage represented the largest percentage by dollar volume with 54.2 percent of total originations as home mortgage, followed by small loans to businesses at 43.5 percent. FFB originated 13 small loans to farms during the evaluation period.

The following information regarding demographic data, affordable housing cost, job market and economic conditions, competition, and community contact/credit needs provides additional performance

<sup>&</sup>lt;sup>1</sup> 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.

context for FFB's operations in the Clarksville MMSA. The tables below provide a summary of demographic data for the AA.

# Clarksville MMSA

Table A – Der	nographic I	nformation	of the Assessn	nent Area								
Asses	Assessment Area: 2021 Clarksville MMSA											
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #						
Geographies (Census Tracts)	63	4.8	20.6	47.6	17.5	9.5						
Population by Geography	274,389	3.4	16.7	57.0	20.9	2.0						
Housing Units by Geography	112,748	3.4	17.3	58.9	19.7	0.6						
Owner-Occupied Units by Geography	56,295	1.9	9.6	60.3	27.9	0.3						
Occupied Rental Units by Geography	41,474	5.3	27.1	55.9	10.9	0.8						
Vacant Units by Geography	14,979	3.8	19.6	62.2	13.4	1.0						
Businesses by Geography	18,079	5.8	15.1	49.7	25.8	3.6						
Farms by Geography	880	2.7	4.3	55.3	36.8	0.8						
Family Distribution by Income Level	70,077	20.4	18.0	21.2	40.4	0.0						
Household Distribution by Income Level	97,769	22.3	16.6	19.6	41.5	0.0						
Median Family Income MSA - 17300 Clarksville, TN-KY MSA		\$53,979	Median Housi	ng Value		\$127,765						
			Median Gross	Rent		\$844						
			Families Belo	w Poverty Lev	vel	13.1%						

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.

Table A – Der	nographic I	nformation	of the Assessn	nent Area							
Assessment Area: 2022-2023 Clarksville MMSA											
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #					
Geographies (Census Tracts)	74	5.4	24.3	39.2	24.3	6.8					
Population by Geography	306,878	3.4	22.9	42.9	29.3	1.5					
Housing Units by Geography	120,675	4.5	24.7	43.6	27.2	0.0					
Owner-Occupied Units by Geography	62,349	2.0	16.2	46.2	35.6	0.0					
Occupied Rental Units by Geography	44,270	7.0	36.3	39.6	17.2	0.0					
Vacant Units by Geography	14,056	7.8	26.0	44.9	21.3	0.0					
Businesses by Geography	24,982	4.7	28.6	36.7	29.4	0.7					
Farms by Geography	1,171	2.2	13.3	47.2	37.1	0.1					
Family Distribution by Income Level	74,571	20.5	18.5	21.1	39.8	0.0					
Household Distribution by Income Level	106,619	22.1	16.7	19.2	41.9	0.0					
Median Family Income MSA - 17300 Clarksville, TN-KY MSA		\$65,849	Median Housi	ng Value		\$154,654					
			Median Gross	Rent		\$951					
			Families Belo	w Poverty Le	vel	10.7%					

Source: 2020 U.S. Census and 2023 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.

## Demographic Data

As of the 2020 U.S. Census data in the table above, the population of the Clarksville MMSA was 306,878, with 3.4 percent living in low-income census tracts (CTs), 22.9 percent in moderate-income CTs, 42.9 percent in middle-income CTs, and 29.3 percent in upper-income CTs. Additionally, 1.5 percent of the population lived in CTs that had not been assigned an income classification. The AA consisted of 74 CTs, and was comprised of four low-income, 18 moderate-income, 29 middle-income, 18 upper-income CTs, and five CTs that had not been assigned an income classification. The AA included 74,571 families and 106,619 households. The major changes from the 2015 ACS include that there are five additional moderate-income geographies and an increase of 12 percent in population.

#### Affordable Housing Cost

Examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the weighted average of the Federal Financial Institutions Examination Council's (FFIEC) updated MSA median family income, low-income families earned less than \$31,500 in 2021, \$35,300 in 2022, and \$36,750 in 2023 and moderate-income families earned less than \$50,400 in 2021, \$56,480 in 2022, and \$58,800 in 2023. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payments of no more than 30 percent of the applicant's income based on assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners' insurance, real estate taxes, or any additional monthly expenses. Using these assumptions, a low-income borrower could afford a maximum mortgage payment of \$788 per month in 2021, \$883 per month in 2022, and \$919 per month in 2023. A moderate-income borrower could afford a maximum payment of \$1,260 per month in 2021, \$1,412 per month in 2022,

and \$1,470 per month in 2023. According to Realtor.com in 2023, the median home value would result in a monthly payment of \$1,772. This illustrates that low- and moderate-income borrowers would be challenged to qualify for a mortgage loan in the AA.

Examiners considered the poverty level across the AA in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For the Clarksville MMSA, the poverty level according to the 2015 ACS was 13.1 percent and declined to 10.7 percent based on the 2020 U.S. Census data.

Housing availability in the AA posed challenges to lending in low- and moderate-income geographies. As of the 2020 U.S. Census, total occupied rental units in the AA were 36.7 percent (43.3 percent in low- and moderate-income CTs) of available units. An additional barrier to available units was the volume of vacant units of 11.6 percent (33.8 percent in low- and moderate-income CTs) of total housing units. Owner-occupied units in the AA accounted for 51.7 percent of total housing units, with only 18.2 percent in low- and moderate-income geographies.

#### Job Market and Economic Conditions

According to the U.S. Bureau of Labor Statistics, the average annual unemployment rate for the states of Kentucky and Tennessee and the Clarksville MMSA gradually improved during the evaluation period. Comparatively, the unemployment rate for the Clarksville MMSA was commensurate with or higher than the states of Kentucky and Tennessee. The following table summarizes these unemployment rates.

Average Annual Unemployment Rates									
2021 2022 2023									
4.5	4.0	4.2							
4.5	3.4	3.3							
4.9	4.0	4.0							
	4.5 4.5	4.5 4.0 4.5 3.4 4.9 4.0							

Based on information from the Moody's Analytics Report as of April 2024, the strengths in the MMSA include a favorable location close to larger labor and consumer markets in Nashville, cost edge for private services from low office rents and state and local taxes, and strong population growth. Clarksville is showing signs of improvement over the last year, and the Fort Campbell military base confers long-term stability on its economy. Large employers in the MMSA include Walmart Inc., Tennova Healthcare, and Trane Co. The federal government, including the Department of Defense, is a leading employer in the area.

#### **Competition**

Investment opportunities are highly competitive. Many community banks tend to purchase mortgage backed securities with home mortgages to low- and moderate-income people or loans in low- and moderate-income geographies, affordable housing multifamily properties, or SBA loan pools in their AAs. CD lending opportunities are available, including opportunities to partner with nonprofit organizations with a CD mission or purpose. There are numerous nonprofits that provide various services to low- and moderate-income people or small businesses, such as affordable housing, financial literacy education, and support for economic development activities.

According to the FDIC's Summary of Deposits as of June 30, 2023, FFB had \$248 million in deposits in the AA which comprised six percent of total bank deposits. Competition was strong with 16 total FDIC insured financial institutions operating 66 offices in the AA. The top competitors were Planters Bank, Inc. with seven branches in the AA and 22.1 percent market share, F&M Bank with nine branches in the AA and 15.4 percent market share, and Legends Bank with five branches in the AA and 10.6 percent market share.

#### Community Contacts/Credit Needs

Examiners reviewed information provided from a recent interview with a community contact to understand the Clarksville MMSA's needs and opportunities. According to the community contact, the largest credit needs in the AA are loans to support affordable housing and funding for a homeless shelter. The increased demand for housing due to increasing rents, home prices, and a tornado have made affordable housing a primary concern.

## Scope of Evaluation in Clarksville, TN-KY MMSA

Examiners performed a full-scope review of the Clarksville MMSA. Home mortgage and small loans to businesses received equal weight when drawing conclusions. The bank did not originate a sufficient volume of small loans to farms to conduct a meaningful analysis. Refer to the Scope of Evaluation section above for further details.

# CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CLARKSVILLE, TN-KY MMSA

## LENDING TEST

The bank's performance under the Lending Test in the Clarksville MMSA is rated Low Satisfactory.

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

## **Lending Activity**

Lending levels reflect excellent responsiveness to AA credit needs.

	Number of Loans										
Small Community											
Assessment Area	Home Mortgage	Business	Small Farm	Development	Total						
Clarksville MMSA	137	122	13	0	272						

Dollar Volume of Loans										
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total					
Clarksville MMSA	21,993	17,645	964	0	40,602					

According to the FDIC Deposit Market Share data as of June 30, 2023, the bank ranked 9<sup>th</sup> among 16 financial institutions with a deposit market share of 4.6 percent, which placed it in the top 57 percent of deposit taking institutions.

According to the 2022 Peer Mortgage data, FFB held a 0.3 percent market share of mortgage loans, by number of loans, ranking 60<sup>th</sup> among 457 reporting lenders (top 13 percent of all lenders). The top three lenders were Mortgage Research Center with 9.5 percent market share, PennyMac Loan Services LLC with 7.4 percent market share, and F&M Bank with 5 percent market share.

According to the 2022 Peer Small Business loan data in the Clarksville MMSA, FFB ranked 22<sup>nd</sup> out of 79 (top 28 percent of all lenders) lenders with a market share of 0.4 percent. The top three lenders were American Express National Bank with 20 percent market share, U.S. Bank, National Association (N.A.) with 15.1 percent market share, and JPMorgan Chase Bank, N.A. with 12.2 percent market share.

# Distribution of Loans by Income Level of the Geography

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

## Home Mortgage Loans

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 geographic distribution of home mortgage loans was excellent.

2021

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

2022 - 2023

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

#### Small Loans to Businesses

Refer to Table 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 small loans to businesses was good.

In determining conclusions, examiners gave consideration for opportunities to lend based the level of competition and the number of businesses located in low- and moderate-income geographies in the Clarksville MMSA. Based on the 2022 Peer Small Business loan data, the top three lenders accounted for approximately 47.3 percent of the total small business market share and are larger financial institutions.

#### 2021

The percentage of small loans to businesses in low-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses in moderate-income geographies was below the percentage of businesses located in those geographies and was near to the aggregate percentage of all reporting lenders.

2022 - 2023

The percentage of small loans to businesses in low-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses in moderate-income geographies was well below the percentage of businesses located in those geographies and was below the aggregate percentage of all reporting lenders.

#### Small Loans to Farms

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 bank did not originate enough small loans to farms to perform a meaningful analysis in the Clarksville MMSA.

# Lending Gap Analysis

Examiners analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA. Examiners did not identify any conspicuous or unexplained gaps in lending.

# Distribution of Loans by Income Level of the Borrower

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

#### Home Mortgage Loans

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

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

Examiners considered affordability constraints, including the percentage of families living below the poverty level, and the barriers these create for families to qualify for home mortgage financing. According to the housing cost analysis under the Description of Operations in the Clarksville MMSA, it illustrated that low- and moderate-income borrowers would be challenged to qualify for a mortgage loan in the AA.

#### 2021

The percentage of home mortgage loans to low-income borrowers was below the percentage of those families and exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers was below the percentage of those families and exceeded the aggregate percentage of all reporting lenders.

2022 - 2023

The percentage of home mortgage loans to low-income borrowers was significantly below the percentage of those families and exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of those families and aggregate percentage of all reporting lenders.

#### Small Loans to Businesses

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

The distribution of the small loans to businesses was adequate based on performance context considerations. In determining the conclusions, examiners gave consideration for opportunities to lend based on the level of competition and the number of non-farm businesses located within the Clarksville MMSA. Additionally, it was noted that 68.9 percent of small loans to businesses made in the Clarksville MMSA did not provide business revenues for 2021. This was primarily due to these loans being part of the SBA's PPP during the COVID-19 pandemic, which did not require borrowers to provide this information as part of the loan process. FFB was responsive to the SBA's PPP and originated a significant volume of PPP loans in 2021.

2021

The percentage of small loans to businesses with revenues of \$1 million or less was significantly below both the percentage of businesses with revenues of \$1 million or less and the aggregate percentage of all reporting lenders. Examiners positively considered the bank's participation in the PPP, which did not require collection of revenue information from borrowers. FFB originated 83 loans totaling \$3.4 million during 2021 under the PPP program.

2022 - 2023

The percentage of small loans to businesses with revenues of \$1 million or less was well below the percentage of businesses with revenues of \$1 million or less and was near to the aggregate percentage of all reporting lenders.

#### Small Loans to Farms

Refer to Table T in the "MMSA" section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

The bank did not originate enough small loans to farms to perform a meaningful analysis in the Clarksville MMSA.

# **Community Development Lending**

The institution has made few if any CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

FFB did not originate any CD loans in the AA during the evaluation period. This had a negative impact on the overall Lending Test rating for the Clarksville MMSA.

# **Product Innovation and Flexibility**

The institution makes little use of innovative and/or flexible lending practices in order to serve AA credit needs.

During the evaluation period, FFB originated three FHA loans totaling \$554,890 among the various flexible home mortgage lending products available in the Clarksville MMSA. Additionally, the bank originated 83 PPP loans totaling \$3.4 million during 2021 in response to the COVID-19 pandemic.

#### INVESTMENT TEST

The institution's performance under the Investment Test in the Clarksville MMSA is rated High Satisfactory.

Based on a full-scope review, the institution's performance in the Clarksville MMSA is good.

The institution has a significant level of qualified CD investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. The institution exhibits good responsiveness to credit and community economic development needs. The institution makes significant use of innovative and/or complex investments to support CD initiatives.

#### **Number and Amount of Qualified Investments**

	Qualified Investments										
Assessment Prior Period* Current Period				,		Unfunded Commitments**					
Area		\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)	
Clarksville MMSA	4	1,752	12	236	16	100.0	1,988	100.0	0	0	

<sup>\*</sup> 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.

FFB made 12 current period investments, totaling \$236,000, representing 0.8 percent of allocated tier 1 capital. Additionally, FFB held four prior period investments, totaling \$1.8 million. Total current and

prior period investments represented 6.3 percent of allocated tier 1 capital. Two of the prior period investments totaling \$1.5 million (outstanding balance) as of the examination date of December 31, 2023, supported revitalization and stabilization in the MMSA by supporting improvements to a local school district and a district career and technical education center. Additionally, one prior period investment with an outstanding balance of \$130,721 as of the examination date provided resources necessary to provide affordable housing to low- and moderate-income individuals in a moderate-income area. Lastly, the fourth prior period investment with a balance of \$116,809 was an affordable housing investment with the Federal Home Loan Bank (FHLB). Larger current period investments and grants supported affordable housing to low- and moderate-income borrowers through government guaranteed loans (Freddie Mac loans). For example, the bank had two current period investments in Freddie Mac loans in Montgomery County (TN) totaling \$198,000.

#### **SERVICE TEST**

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

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

# **Retail Banking Services**

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

	Distribution of Branch Delivery System											
Deposits Branches												
Assessment	% of Rated	# of BANK	% of Rated	-			% of P	opulatio	n within l	Each Geo	graphy	
Area	Area	Branches	Area					_		3.61.1	• • •	3.7/1
	Deposits in AA		Branches in AA	Low	Mod	Mid	Upp	Low	Mod	Mid	Upp	N/A
Clarksville MMSA	100.0	7	100.0	14.3	42.9	28.6	14.3	3.4	22.9	42.9	29.3	1.5

<sup>\*</sup>Due to rounding, totals may not equal 100 percent.

The bank's distribution of branches in low- and moderate- income geographies exceeded the percentage of the population living within those geographies. Three branches are in moderate- income CTs and one branch is in a low- income CT. Five branches have ATMs.

FFB offered ADS including ATMs, Call Center, and digital banking (online/mobile). These systems provided additional delivery availability and access to banking services to both retail and business customers.

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

The bank did not open or close branches during the evaluation period. Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. FFB maintained standard business hours at its branch locations in the AA with extended hours offered on Fridays. The branches offer Saturday hours (at four branches), drive-up facilities, and night deposit services.

# **Community Development Services**

The institution provides an adequate level of CD services. During the evaluation period, six FFB employees provided 222 qualified CD service hours. Leadership was evident through board and committee participation with five bank employees providing 162 service hours during the evaluation period. The bank's assistance was responsive to identified needs in the AA.

Examples of CD services in the AA include:

- A market president provided 36 hours of board services to an organization that provides economic development services in a low- to moderate-income CT.
- A branch manager provided 45 hours of board services to an organization that provides community services to low- to moderate-income individuals.

# **State Rating**

#### State of Illinois

CRA rating for the State of Illinois: Satisfactory
The Lending Test is rated: High Satisfactory
The Investment Test is rated: Needs to Improve
The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending activity levels reflect good responsiveness to community credit needs.
- The bank exhibits an adequate geographic distribution of loans in its AAs. FFB exhibits a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- CD lending had a positive impact on the Lending Test rating.
- The bank has a poor level of qualified CD investments.
- Service delivery systems are accessible to geographies and individuals of different income levels. FFB provided an adequate level of CD services in the IL Non-MSA.

# **Description of Institution's Operations in Illinois**

FFB has four AAs within the state of Illinois. These AAs include the Bloomington MSA, Champaign MSA, Danville MSA, and the combined IL Non-MSA. Refer to appendix A for a complete list of counties included in each AA.

As of December 31, 2023, FFB operated 26 branches and 31 ATMs, of which 24 were deposit-taking, within the Illinois AAs. The state of Illinois represented FFB's second largest rating area in terms of deposits. According to the June 30, 2023, FDIC Summary of Deposit information, FFB had \$921 million in deposits in the Illinois AAs, which represented 22.4 percent of the bank's total deposits. The bank ranked fifth out of 81 depository institutions in deposit market share with 4.1 percent in the combined Illinois AAs. The top three competitors included Busey Bank with 14 branches and 15.5 percent market share, First Mid Bank & Trust, N.A. with 15 branches and 7.8 percent market share, and JPMorgan Chase Bank, N.A. with four branches and 6.8 percent market share.

During the evaluation period, the bank originated or purchased \$162.2 million in home mortgage, small loans to businesses, and small loans to farms inside the Illinois AAs, which represented 19.2 percent of the total loan originations inside all the AAs. By number of loans, FFB made 1,616 home mortgage, small loans to businesses, and small loans to farms inside the Illinois AAs, which represented 19.8 percent of the total originations inside all the AAs. Home mortgage represented the largest percentage of originations by dollar volume with 48.6 percent of total originations, followed by small loans to businesses at 25.8 percent. The IL Non-MSA represented the largest percentage of total originations by number of loans at 64.9 percent, with the Danville MSA holding 19.7 percent.

# **Bloomington MSA**

The Bloomington MSA consisted of McLean County. FFB operated two branches and four ATMs, two of which were full-service ATMs, in the Bloomington MSA. One branch was in a moderate-income geography, and one was in a middle-income geography. There was one full-service ATM and one cash only ATM in a moderate-income geography.

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

Table A – Der	nographic I	nformation	of the Assessn	nent Area							
Assessment Area: 2021 Bloomington MSA											
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #					
Geographies (Census Tracts)	41	9.8	17.1	53.7	19.5	0.0					
Population by Geography	173,114	6.4	13.6	53.5	26.5	0.0					
Housing Units by Geography	70,897	5.9	15.3	55.1	23.7	0.0					
Owner-Occupied Units by Geography	42,905	2.3	14.3	53.9	29.5	0.0					
Occupied Rental Units by Geography	22,441	10.9	16.4	57.4	15.3	0.0					
Vacant Units by Geography	5,551	13.3	19.0	54.5	13.2	0.0					
Businesses by Geography	10,457	8.4	12.6	54.2	24.7	0.0					
Farms by Geography	647	1.7	7.1	68.6	22.6	0.0					
Family Distribution by Income Level	40,488	19.4	17.3	22.2	41.1	0.0					
Household Distribution by Income Level	65,346	25.4	14.9	17.4	42.3	0.0					
Median Family Income MSA - 14010 Bloomington, IL MSA		\$83,034	Median Housi	ng Value		\$155,857					
			Median Gross	Rent		\$790					
			Families Belo	w Poverty Le	vel	6.8%					

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.

Table A – Demographic Information of the Assessment Area								
Assessment Area: 2022-2023 Bloomington MSA								
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #		
Geographies (Census Tracts)	47	2.1	27.7	46.8	17.0	6.4		
Population by Geography	170,954	1.3	23.3	47.5	19.7	8.1		
Housing Units by Geography	72,580	1.5	26.7	49.5	15.8	6.5		
Owner-Occupied Units by Geography	43,005	0.8	23.7	51.0	22.6	1.9		
Occupied Rental Units by Geography	23,220	2.4	31.1	47.0	6.2	13.3		
Vacant Units by Geography	6,355	2.8	31.5	48.1	4.5	13.0		
Businesses by Geography	13,016	0.8	22.4	50.5	18.0	8.3		
Farms by Geography	785	0.3	17.5	63.8	15.8	2.7		
Family Distribution by Income Level	39,665	21.0	16.9	22.4	39.7	0.0		
Household Distribution by Income Level	66,225	27.3	14.3	16.5	42.0	0.0		
Median Family Income MSA - 14010 Bloomington, IL MSA		\$93,882	Median Housi	ng Value		\$160,478		
	•		Median Gross	Rent		\$843		
			Families Belov	w Poverty Lev	vel	8.0%		

Source: 2020 U.S. Census and 2023 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.

# <u>Demographic Data</u>

As of the 2020 U.S. Census data in the table above, the population of the Bloomington MSA was 170,954, with 1.3 percent living in low-income CTs, 23.3 percent in moderate-income CTs, 47.5 percent in middle-income CTs, and 19.7 percent in upper-income CTs. Additionally, 8.1 percent of the population lived in CTs that had not been assigned an income classification. The AA consisted of 47 CTs with one low-income CTs, 13 moderate-income CTs, 22 middle-income CTs, eight upper-income CTs, and three CTs had not been assigned an income classification. The AA included 39,665 families and 66,225 households. The major change from the 2015 ACS Census to the 2020 U.S. Census is the addition of six CTs. Additionally, the number of low-income CTs decreased from four to one and the number of moderate-income CTs increased from seven to 13.

#### Affordable Housing Cost

Examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the weighted average of the FFIEC updated MSA median family income, low-income families earned less than \$46,600 in 2021, \$54,250 in 2022, and \$57,500 in 2023 and moderate-income families earned less than \$74,560 for 2021, \$86,800 in 2022, and \$92,000 for 2023. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payments of no more than 30 percent of the applicant's income based on assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners' insurance, real estate taxes, or any additional monthly expenses. Using these assumptions, a low-income borrower could afford a maximum mortgage payment of \$1,165 per month in 2021, \$1,356 per month in 2022, and \$1,438 per month in 2023. A moderate-income borrower could afford a maximum payment of \$1,864 per month in 2021, \$2,170 per month in 2022, and \$2,300 per month in 2023. According to Realtor.com in 2023, the

median home value would result in a monthly payment of \$1,744. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA.

Examiners considered the poverty level across the AA in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For the Bloomington MSA, the poverty level according to the 2015 ACS was 6.8 percent in 2021 and increased to 8.0 percent in 2023 based on the 2020 U.S. Census data.

Housing availability in the AA posed challenges to lending in low- and moderate-income geographies. As of the 2020 U.S. Census, total occupied rental units in the AA were 32 percent (33.5 percent in low- and moderate-income CTs) of available units. An additional barrier to available units was the volume of vacant units of 8.7 percent (34.3 percent in low- and moderate-income CTs) of total housing units. Owner-occupied units in the AA accounted for 59.3 percent of total housing units, with 24.5 percent in low- and moderate-income CTs.

#### Job Market and Economic Conditions

According to the U.S. Bureau of Labor Statistics, the average annual unemployment rate for the state of Illinois and Bloomington MSA gradually improved during the evaluation period. Comparatively, the unemployment rate for the Bloomington MSA was lower than the state of Illinois. The following table summarizes these unemployment rates.

Average Annual Unemployment Rates						
2021 2022 2023						
State of Illinois	6.1	4.6	4.5			
Bloomington MSA	4.8	3.8	3.9			
Source: U.S. Bureau of Labor Statistics; Rates Not S	Seasonally Adjusted.					

According to the October 2023 Moody's Analytics Report, the MSA strengths include an outsized core of white-collar service jobs, presence of the Illinois State University, low business cost (especially office rent), and below-average cost of living. The leading industries by wage tier include insurance carriers, offices of physicians, printing and related support activities, and computer systems design and related services. Major employers include State Farm Insurance Companies, Rivian, Illinois State University, and Country Financial.

#### Competition

Investment opportunities are highly competitive. Many community banks tend to purchase mortgage backed securities with home mortgages to low- and moderate-income people or loans in low- and moderate-income geographies, affordable housing multifamily properties, or SBA loan pools in their AAs. CD lending opportunities are available, including opportunities to partner with nonprofit organizations with a CD mission or purpose. There are numerous nonprofits that provide various services to low- and moderate-income people or small businesses, such as affordable housing, financial literacy education, and support for economic development activities.

According to the FDIC Summary of Deposits as of June 30, 2023, FFB had \$50.4 million in deposits in the AA which comprised 1.2 percent of total bank deposits. Competition was moderate with 25 total FDIC insured financial institutions operating 47 offices in the AA. The top competitors were Commerce

Bank with three branches in the AA and 17.8 percent market share, Heartland Bank and Trust Company with nine branches in the AA and 16.9 percent market share, and PNC Bank, N.A with four branches in the AA and 14.3 percent market share.

# Community Contacts/Credit Needs

Examiners reviewed two community contacts with the same small business development organization (initial contact in 2021 and updated in 2023) that supports business development in the AA. The most recent contact completed in 2023 stated that affordable housing is a significant need in the Bloomington MSA. According to the contact, labor shortages, rising construction costs, and high interest rates have made it difficult for residential real estate developers to meet the demand for affordable housing. The contact stated that the Bloomington MSA has experienced significant small business growth in the last few years, and that local banks have been willing and able to meet the needs of small businesses. The contact also stated that general financial literacy education and small business education are needs in the community. In the contact's opinion, local financial institutions are adequately meeting the credit and community development needs of the community.

## IL Non-MSA

The IL Non-MSA is comprised of 13 nonmetropolitan Illinois counties of Clark, Coles, Crawford, Cumberland, Edgar, Franklin, Jasper, Jefferson, Lawrence, Livingston, Marion, Richland, and Wayne. FFB operated 15 branches and 17 ATMs, 14 of which were full-service ATMs, in the IL Non-MSA. During the evaluation period, seven CTs within Lawrence and Richland counties were included on the FFIEC List of Distressed or Underserved Nonmetropolitan Middle-Income geographies. These counties were either distressed due to unemployment or underserved due to remote rural location. Richland County had three CTs on the 2021 FFIEC list and four CTs on the 2022 and 2023 FFIEC list. Lawrence County had three CTs included on the FFIEC 2023 list.

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

Table A – Demographic Information of the Assessment Area								
Assessment Area: 2021 IL Non-MSA								
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #		
Geographies (Census Tracts)	93	1.1	21.5	66.7	9.7	1.1		
Population by Geography	331,280	0.5	20.3	66.5	11.1	1.6		
Housing Units by Geography	148,607	0.5	21.1	67.1	10.6	0.7		
Owner-Occupied Units by Geography	96,176	0.2	17.1	70.9	11.6	0.1		
Occupied Rental Units by Geography	35,303	1.1	29.1	57.7	10.0	2.1		
Vacant Units by Geography	17,128	1.1	26.4	64.7	6.4	1.4		
Businesses by Geography	19,095	2.0	25.3	60.2	12.0	0.5		
Farms by Geography	2,177	0.1	7.7	79.7	12.5	0.0		
Family Distribution by Income Level	85,245	22.4	18.1	21.6	37.9	0.0		
Household Distribution by Income Level	131,479	26.1	16.2	17.6	40.2	0.0		
Median Family Income Non-MSAs - IL		\$59,323	Median Housi	ng Value		\$84,921		
Median Gross Rent						\$600		
Families Below Poverty Level					11.8%			

Source: 2015 ACS and 2021 D&B Data
Due to rounding, totals may not equal 100.0%

<sup>(\*)</sup> The NA category consists of geographies that have not been assigned an income classification.

Table A – Demographic Information of the Assessment Area								
Assessment Area: 2022-2023 IL Non-MSA								
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #		
Geographies (Census Tracts)	94	2.1	25.5	66.0	6.4	0.0		
Population by Geography	313,333	1.5	23.6	67.3	7.6	0.0		
Housing Units by Geography	150,574	1.8	24.4	66.2	7.6	0.0		
Owner-Occupied Units by Geography	95,953	1.4	18.9	71.6	8.1	0.0		
Occupied Rental Units by Geography	36,618	2.5	36.3	54.3	6.9	0.0		
Vacant Units by Geography	18,003	2.4	29.7	62.0	5.9	0.0		
Businesses by Geography	22,676	1.8	27.6	63.5	7.1	0.0		
Farms by Geography	2,465	0.4	7.7	82.1	9.7	0.0		
Family Distribution by Income Level	84,485	22.3	18.9	21.3	37.4	0.0		
Household Distribution by Income Level	132,571	25.7	16.8	17.9	39.6	0.0		
Median Family Income Non-MSAs - IL		\$68,958	Median Housi	ng Value		\$94,015		
			Median Gross	Rent		\$681		
			Families Belov	w Poverty Lev	vel	10.8%		

Source: 2020 U.S. Census and 2023 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.

# Demographic Data

As of the 2020 U.S. Census data in the table above, the population of the IL Non-MSA was 313,333, with 1.5 percent living in low-income CTs, 23.6 percent in moderate-income CTs, 67.3 percent in middle-income CTs, and 7.6 percent in upper-income CTs. The AA consisted of 94 CTs with two low-income CTs, 24 moderate-income CTs, 62 middle-income CTs, and six upper-income CTs. The AA included 84,485 families and 132,571 households. The major changes from the 2015 ACS Census to the 2020 U.S. Census are an increase in moderate-income CTs from 20 to 24 and a decrease in population of five percent.

# Affordable Housing Cost

Examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the weighted average of the FFIEC updated MSA median family income, low-income families earned less than \$33,350 in 2021, \$38,050 in 2022, and \$41,150 in 2023 and moderate-income families earned less than \$53,360 for 2021, \$60,880 in 2022, and \$65,840 for 2023. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payments of no more than 30 percent of the applicant's income based on assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners' insurance, real estate taxes, or any additional monthly expenses. Using these assumptions, a low-income borrower could afford a maximum mortgage payment of \$834 per month in 2021, \$951 per month in 2022, and \$1,029 per month in 2023. A moderate-income borrower could afford a maximum payment of \$1,334 per month in 2021, \$1,522 per month in 2022, and \$1,646 per month in 2023. According to Realtor.com in 2023, the average median home value for the 13 counties in the IL Non-MSA would result in a monthly payment of \$742, which would be affordable for low- and moderate-income borrowers.

Examiners considered the poverty level across the AA in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For the IL Non-MSA, the poverty level according to the 2015 ACS was 11.8 percent and declined to 10.8 percent based on the 2020 Census.

Housing availability in the AA posed challenges to lending in low- and moderate-income geographies. As of the 2020 U.S. Census, total occupied rental units in the AA were 24.3 percent (38.8 percent in low- and moderate-income CTs) of available units. An additional barrier to available units was the volume of vacant units of 12 percent (32.1 percent in low- and moderate-income CTs) of total housing units. Owner-occupied units in the AA accounted for 63.7 percent of total housing units, with 20.3 percent in low- and moderate-income CTs.

#### Job Market and Economic Conditions

According to the U.S. Bureau of Labor Statistics, the average annual unemployment rate for the state of Illinois and IL Non-MSA gradually improved during the evaluation period. Comparatively, the unemployment rate for the IL Non-MSA counties was commensurate with or lower than the state of Illinois for most of the counties. However, the unemployment rates in Franklin and Lawrence counties exceeded the state unemployment rate for each year in the table below. The following table summarizes the unemployment rates for each county in the IL Non-MSA. Major employers in the IL Non-MSA include Continental Tire, SSM Health Good Samaritan Hospital Center, Walgreen's Distribution Center, North American Lighting, and Eastern Illinois University.

Average Annual Unemployment Rates							
	2021	2022	2023				
State of Illinois	6.1	4.6	4.5				
Clark County	5.2	4.4	4.6				
Cole County	5.3	4.4	4.4				
Crawford County	5.2	4.3	4.0				
Cumberland County	4.3	3.6	3.5				
Edgar County	4.2	3.6	3.7				
Franklin County	6.8	5.4	5.5				
Jasper County	4.3	3.9	4.0				
Jefferson County	6.4	4.9	4.7				
Lawrence County	6.6	5.8	5.4				
Livingston County	5.1	4.1	4.1				
Marion County	6.0	4.8	4.9				
Richland County	4.5	3.9	4.2				
Wayne County	4.9	4.1	4.6				
Source: U.S. Bureau of Labor Statis	tics; Rates Not Seasonally Adju	sted.					

#### **Competition**

According to the FDIC Summary of Deposits as of June 30, 2023, FFB had \$483.9 million in deposits in the AA which comprised 11.8 percent of total bank deposits. Competition was moderate with 52 total FDIC insured financial institutions operating 158 offices in the AA. The top competitors were First Mid Bank & Trust, N.A. with eight branches in the AA and 15.2 percent market share, Peoples National Bank, N.A. with eight branches in the AA and 7.8 percent market share, and Bank of Pontiac with seven branches in the AA and 5.8 percent market share.

#### Community Contacts/Credit Needs

Examiners reviewed three community contacts in the IL Non-MSA, two small business development organizations and one affordable housing organization. One contact stated that banks continue to be engaged but there are needs for small business, small farm, and 1-4 family real estate loans in the community. Another contact stated that labor shortages have affected businesses and there is a need to reinvest in distressed communities in the region. An additional contact stated many small businesses closed during the pandemic, but there are job openings with new manufacturers in the community. This contact also stated that there is a shortage of rental housing stock and affordable housing is a need in the community. There are opportunities for general operating support for CD organizations and financial and housing counseling. One contact stated that local banks are generally meeting the needs within the community.

# **Scope of Evaluation in Illinois**

Examiners selected the IL Non-MSA and Bloomington MSA for full-scope reviews. The IL Non-MSA represents the largest concentration of deposits, branches, and lending within Illinois, with the most weight placed on the IL Non-MSA. The Bloomington MSA had not recently received a full-scope review. The Champaign and Danville MSAs received a limited-scope review. Refer to the table in Appendix A for more information.

In the IL Non-MSA, lending opportunities in low-income geographies were limited due to a low volume of owner-occupied housing, small businesses, and small farms. For each geographic comparison, examiners placed more emphasis on performance in moderate-income geographies. For the IL Non-MSA, examiners placed more emphasis on home mortgage lending.

For the Bloomington MSA, conclusions were based solely on performance of originating or purchasing small loans to businesses as FFB did not originate a sufficient volume of home mortgage or small loans to farms to conduct a meaningful analysis.

# CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

#### LENDING TEST

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

# **Conclusions for Areas Receiving Full-Scope Reviews**

Based on full-scope reviews, the bank's performance in the Bloomington MSA is adequate while the IL Non-MSA is good.

# **Lending Activity**

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans*							
	Home	Small	Small	Community		%State	%State
Assessment Area	Mortgage	Business	Farm	Development	Total	Loans	Deposits
Bloomington MSA	32	55	11	1	99	6.1	5.5
Champaign MSA	81	64	7	0	152	9.3	10.2
Danville MSA	149	126	43	7	325	20.0	31.8
IL Non-MSA	510	250	288	1	1,049	64.5	52.5
Statewide/Regional	-	-	-	2	2	0.1	-
Area							
Total	772	495	349	11	1,627	100.0	100.0

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

Dollar Volume of Loans*							
	Home	Small	Small	Community		%State*	%State
Assessment Area	Mortgage	Business	Farm	Development	Total	Loans	Deposits
Bloomington MSA	\$3,658	\$6,476	\$773	\$200	\$11,107	6.3	5.5
Champaign MSA	\$26,731	\$6,947	\$896	\$0	\$34,574	19.8	10.2
Danville MSA	\$10,951	\$10,075	\$2,639	\$1,688	\$25,353	14.5	31.8
IL Non-MSA	\$37,476	\$18,318	\$37,273	\$1,125	\$94,192	53.9	52.5
Statewide/Regional	-	-	-	9,660	9,660	5.5	-
Area							
Total	\$78,816	\$41,816	\$41,581	\$12,673	\$174,886	100.0	100.0

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

# Bloomington MSA

Lending levels reflect poor responsiveness to AA credit needs.

According to the FDIC Deposit Market Share data as of June 30, 2023, the bank ranked 13<sup>th</sup> among 25 financial institutions with a deposit market share of 1.2 percent, placing it in the top 52 percent of deposit-taking institutions.

According to the 2022 Peer Mortgage data, FFB held a 0.1 percent market share of mortgage loans, by number of loans, ranking 70<sup>th</sup> among 253 reporting lenders (top 28 percent of all lenders). The market share by dollar volume was also minimal at 0.1 percent, which is below the deposit share market. The top three lenders were First State Mortgage Services with 13.6 percent market share, Citizens Equity First Credit Union with 7.1 percent market share, Flagstar Bank, N.A. with 5.3 percent market share.

According to the 2022 Peer Small Business data, FFB's business lending activity is adequate considering the level of competition and the average dollar amount of loans originated. FFB had a 0.4 percent market share of small loans to businesses by the number of loans and ranked 22<sup>nd</sup> out of 76 reporting lenders (top 29 percent of all lenders). The market share by dollar volume of 1.3 percent is consistent with the deposit market share. The top five institutions had an average loan size of \$46,600 compared to FFB's average loan size of \$193,000. JPMorgan Chase Bank, N.A., American Express National Bank, Heartland Bank and Trust Company, Capital One, N.A., and U.S. Bank, N.A. held 55.6 percent of the total lender market share by number of loans.

According to 2022 Peer Small Farm data, FFB had a 0.6 percent market share of small farm loan originations. The market share of small farm loan originations ranked 14<sup>th</sup> out of 18 lenders in the AA (top 78 percent of all lenders). The market share ranking of small farm loan originations was weaker their deposit market share. The five largest small farm lenders have captured 77.9 percent of the market share, with Heartland Bank and Trust Company and John Deere Financial, F.S.B. as the top two.

#### IL Non-MSA

Lending levels reflect good responsiveness to AA credit needs.

According to the FDIC Deposit Market Share data as of June 30, 2023, FFB ranked fourth among 52 financial institutions with a deposit market share of 4.9 percent, placing it in the top eight percent of deposit-taking institutions.

According to the 2022 Peer Mortgage data, FFB held a 3.9 percent market share of mortgage loans, by number of loans, ranking fifth among 274 reporting lenders (top 2 percent of all lenders). The market share by dollar volume was 2.1 percent, which is below the deposit share market. The top five lenders, including FFB, hold 26.3 percent of the total lender market share by number of loans.

According to the 2022 Peer Small Business data, FFB's business lending activity is adequate considering the level of competition and the average dollar amount of loans originated. FFB had a 2.4 percent market share of small loans to businesses by the number of loans and ranked 11<sup>th</sup> out of 85 reporting lenders (top 13 percent of all lenders). The market share by dollar volume of 7.4 percent is above the deposit market share. The top five institutions had an average loan size of \$15,200 compared to FFB's average loan size of \$133,000. JPMorgan Chase Bank, N.A., U.S. Bank N.A., American

Express National Bank, Capital One, N.A., and John Deere Financial, F.S.B. held 52.4 percent of the total lender market share by number of loans.

According to 2022 Peer Small Farm data, FFB had a 6.8 percent market share of small farm loan originations. The market share of small farm loan originations was stronger than the deposit market share. The market share of small farm loan originations ranked 6<sup>th</sup> out of 19 lenders in the AA (top 32 of percent of all lenders). The market share ranking of small farm loan originations was above their deposit market share. The five largest small farm lenders captured 70.8 percent of the market by number of loans, with John Deere Financial, F.S.B with the highest market share at 29.7 percent.

# Distribution of Loans by Income Level of the Geography

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

# Home Mortgage Loans

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.

## **Bloomington MSA**

FFB did not originate enough home mortgage loans to perform a meaningful analysis in the Bloomington MSA.

#### IL Non-MSA

The geographic distribution of home mortgage loans in the IL Non-MSA was good.

Examiners considered the low volume (0.2 percent) of owner-occupied housing units in low-income CTs, the limited percentage (0.1 percent) of reporting lenders originating loans in low-income CTs, and the high percentage of occupied rental units and vacant units in the low-income CTs as of the 2015 ACS Census, which limits the bank's lending opportunities.

#### 2021

The bank did not originate any home mortgage loans in the low-income CTs. The percentage of home mortgage loans in moderate-income geographies was below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. Examiners placed more weight on moderate-income given the limited opportunities in the low-income geographies.

#### 2022 - 2023

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

#### Small Loans to Businesses

Refer to Table 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.

## Bloomington MSA

The geographic distribution of small loans to businesses in the Bloomington MSA was excellent.

2021

The percentage of small loans to businesses in low-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

2022 - 2023

The bank did not originate enough small loans to businesses in 2022 - 2023 to perform a meaningful analysis.

## IL Non-MSA

The geographic distribution of small business loans in the IL Non-MSA was adequate.

2021

The percentage of small loans to businesses in low-income geographies was well below the percentage of businesses located in those geographies and below the aggregate percentage of all reporting lenders. Examiners considered the low volume (2.0 percent) of businesses in low-income CTs and the limited percentage (1.6 percent) of reporting lenders originating loans in low-income CTs, which limits the bank's lending opportunities. The percentage of small loans to businesses in moderate-income geographies was near to the percentage of businesses located in those geographies and exceeded the aggregate percentage of all reporting lenders.

2022 - 2023

FFB did not originate any small loans to businesses in the low-income CTs. Examiners considered the low volume (1.8 percent) of businesses in low-income CTs and the limited percentage (1.9 percent) of reporting lenders originating loans in low-income CTs, which limits the bank's lending opportunities. The percentage of small loans to businesses in moderate-income geographies was near to the percentage of businesses located in those geographies and exceeded the aggregate percentage of all reporting lenders.

#### Small Loans to Farms

Refer to Table S 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 farms.

# Bloomington MSA

The bank did not originate enough small loans to farms to perform a meaningful analysis in the Bloomington MSA in either analysis period.

#### IL Non-MSA

The geographic distribution of small loans to farms in the IL Non-MSA was poor.

2021

Small farm loan opportunities were very limited in the low-income geographies. The percentage of small loans to farms in moderate-income geographies was below the percentage of farms located in those geographies and exceeded the aggregate percentage of all reporting lenders.

2022 - 2023

FFB did not originate any small loans to farms in the low-income geographies. However, small farm loan opportunities were very limited in the low-income geographies. The percentage of small loans to farms in moderate-income geographies was significantly below both the percentage of farms located in those geographies and the aggregate percentage of all reporting lenders.

#### Lending Gap Analysis

Examiners analyzed geographic lending patterns of home mortgage loans, small loans to businesses, and small loans to farms by reviewing maps of loan originations and purchases throughout the AA. Examiners did not identify any conspicuous or unexplained gaps in lending.

# Distribution of Loans by Income Level of the Borrower

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

# Home Mortgage Loans

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.

#### Bloomington MSA

FFB did not originate enough home mortgage loans to perform a meaningful analysis in the Bloomington MSA.

#### IL Non-MSA

The bank's distribution of home mortgage loans to individuals of different income levels in the IL Non-MSA was excellent.

#### 2021

The percentage of home mortgage loans to low-income borrowers was below the percentage of families and exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of families and the aggregate percentage of all reporting lenders.

2022 - 2023

The percentage of home mortgage loans to low-income borrowers was below the percentage of families and exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of families and the aggregate percentage of all reporting lenders.

#### Small Loans to Businesses

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.

# **Bloomington MSA**

The distribution of small loans to businesses of different sizes in the Bloomington MSA was adequate, based on performance context regarding PPP loan volume.

2021

This analysis included approximately 23 PPP loans totaling \$808,000 that helped support small businesses during the COVID-19 pandemic. The percentage of small loans to businesses with gross annual revenues of \$1 million or less was significantly below the percentage of businesses with revenues of \$1 million or less and was well below the aggregate percentage of all reporting lenders.

Examiners considered the impact of the high percentage of small loans to businesses with revenue information unavailable on the borrower distribution analysis. For 41 percent of small loans to businesses in the Bloomington MSA, borrower revenue information was not available. The majority of the loans with unknown revenues were PPP loans which did not require the bank to collect or consider gross annual revenues.

2022 - 2023

The bank did not originate enough small loans to businesses of different sizes in 2022 - 2023 to perform a meaningful analysis.

#### IL Non-MSA

The distribution of small loans to businesses of different sizes in the IL Non-MSA was good, with more weight placed on the 2022 - 2023 analysis.

#### 2021

This analysis included approximately 166 PPP loans totaling \$4.6 million that helped support small businesses during the COVID-19 pandemic. The percentage of small loans to businesses with gross annual revenues of \$1 million or less was well below the percentage of businesses with revenues of \$1 million or less and was below the aggregate percentage of all reporting lenders.

Examiners considered the impact of the high percentage of small loans to businesses with revenue information unavailable on the borrower distribution analysis. For 48.9 percent of small loans to businesses in the IL Non-MSA, borrower revenue information was not available. The majority of the loans with unknown revenues were PPP loans which did not require the bank to collect or consider gross annual revenues.

2022 - 2023

The percentage of small loans to businesses with gross annual revenues of \$1 million or less was near to the percentage of businesses with revenues of \$1 million or less and exceeded the aggregate percentage of all reporting lenders.

#### Small Loans to Farms

Refer to Table T in the state of Illinois 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.

# Bloomington MSA

The bank did not originate enough small loans to farms perform a meaningful analysis in the Bloomington MSA during either period.

#### IL Non-MSA

The distribution of small loans to farms of different sizes in the IL Non-MSA was good.

2021

The percentage of small loans to farms with gross annual revenues of \$1 million or less was near to the percentage of small farms with revenues of \$1 million or less and exceeded the aggregate percentage of all reporting lenders.

2022 - 2023

The percentage of small loans to farms with gross annual revenues of \$1 million or less was near to the percentage of small farms with revenues of \$1 million or less and exceeded the aggregate percentage of all reporting lenders.

## **Community Development Lending**

The institution has made an adequate level of CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

### **Bloomington MSA**

The level of CD lending is adequate. FFB originated one CD loan totaling \$200,000, which represented 3.1 percent of allocated tier 1 capital. This loan funded a business line of credit that supported a local community action agency targeted to support low- and moderate-income individuals and families in a low-income CT.

#### IL Non-MSA

The level of CD lending is adequate. FFB originated one CD loan totaling \$1.1 million, which represented 1.8 percent of allocated tier 1 capital. This included one PPP loan totaling \$1.1 million that supported area businesses during the COVID-19 pandemic.

### Statewide/Regional Area

Because the bank was responsive to CD needs and opportunities in the full-scope areas, broader statewide and regional loans that do not have a purpose, mandate, or function to serve the AAs received consideration in the assessment. During the evaluation period, FFB made two loans totaling \$9.7 million in the broader statewide region which represented 8.3 percent of allocated tier 1 capital for the state of Illinois. The two loans were to the same company that serves multiple counties in the AA, including distressed middle-income areas and moderate-income CTs. Lending in the statewide and regional area further supports the overall High Satisfactory rating in the state of Illinois.

## **Product Innovation and Flexibility**

The institution makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank participates in flexible loan programs. The flexible loan programs were considered in the overall performance and are described in the Other Information section under the Scope of the Evaluation.

## **Bloomington MSA**

During the evaluation period, FFB made no loans among the various flexible home mortgage lending products available in the Bloomington MSA. In response to the COVID-19 pandemic, FFB originated 23 PPP loans totaling \$808,000 during 2021.

#### IL Non-MSA

During the evaluation period, FFB originated various flexible mortgage lending products available in the IL Non-MSA. This included 14 FHA loans totaling \$1.6 million, two VA loan totaling \$192,625, and 11 RHS/FSA loans totaling \$813,964. In response to the COVID-19 pandemic, FFB originated 166 PPP loans totaling \$4.6 million during 2021.

# **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Lending Test in the Champaign MSA is weaker than and the Danville MSA is consistent with the bank's overall performance under the Lending Test in the full-scope areas. In the Champaign MSA, the bank did not originate any CD loans during the evaluation period. Additionally, the bank's lending activity in the Champaign MSA was poor compared to overall good performance for the full-scope AAs. The poor performance in the Champaign MSA did not have an impact on the overall performance.

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

#### **INVESTMENT TEST**

The bank's performance under the Investment Test in Illinois is rated Needs to Improve.

## **Conclusions for Areas Receiving Full-Scope Reviews**

Based on full-scope reviews, the bank's performance in the Bloomington MSA is excellent and IL Non-MSA is poor.

The institution has a poor level of qualified CD investments and grants, but not in a leadership position, particularly those that are routinely provided by private investors.

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

	Qualified Investments									
	Pric	or Period*	Curi	Current Period			otal o		Unfunded	
Assessment Area									Com	mitments**
	#	\$(000's)	#	\$(000's)	#	% of	\$(000's)	% of	#	\$(000's)
						Total #		Total \$		
Bloomington MSA	5	634	11	1,299	16	29.6	1,933	21.1	0	0
Champaign MSA	3	419	8	3,627	11	20.4	4,046	44.2	0	0
Danville MSA	0	0	5	31	5	9.3	31	0.3	0	0
IL Non-MSA	2	648	17	210	19	35.2	858	9.4	0	0
Statewide/Regional	3	2,284	0	0	3	5.5	2,284	25.0	0	0
Area										
Total	13	3,985	41	5,167	54	100.0	9,152	100.0	0	0

<sup>\*</sup> Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

<sup>\*\*</sup> Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

### **Bloomington MSA**

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

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

During the evaluation period, FFB made 11 investments and donations totaling \$1.3 million supporting affordable housing needs and community services to low- and moderate-income individuals. The bank also held five prior-period investments supporting affordable housing needs and revitalization/stabilization projects totaling \$634,000. The dollar volume of current- and prior-period investments represented 30.2 percent of allocated tier 1 capital.

Notable examples of investments and grants include:

- \$1.3 million to support affordable housing for low- and moderate-income individuals.
- \$10,000 donation to an organization that provides services to low- and moderate-income individuals with developmental disabilities.

#### IL Non-MSA

The institution has a poor level of qualified CD investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

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

During the evaluation period, FFB made 17 investments and donations totaling \$210,000 supporting affordable housing needs and community services to low- and moderate-income individuals. The bank also held two prior-period investments supporting affordable housing needs and revitalization/stabilization projects totaling \$648,000. The dollar volume of current- and prior-period investments represented 1.4 percent of allocated tier 1 capital.

Notable examples of investments and grants include:

• Current period investment of \$104,357 to support affordable housing for low- and moderate-income individuals through Freddie Mac loans.

#### Statewide/Regional Area

FFB received consideration for the broader statewide or regional investments that have a purpose, mandate, or function to serve the state of Illinois, including the AAs. The bank made three prior period investments totaling \$2.3 million to support economic development and revitalization, representing two percent of allocated tier 1 capital in Illinois. Statewide and regional lending activities did not have an impact on the overall Investment Test rating for the state of Illinois.

# **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Investment Test in the Champaign MSA is stronger than the bank's overall performance under the Investment Test in the full-scope areas. The bank's performance under the Investment Test in the Danville MSA is weaker than the bank's overall performance under the Investment Test in the full-scope areas. In the Champaign MSA, FFB made 11 investments totaling \$4 million, representing 33.9 percent of allocated tier 1 capital. In the Danville MSA, FFB made five investments totaling \$31,000, representing less than one percent of allocated tier 1 capital. The bank's performance in the Champaign and Danville MSAs did not have an impact on the overall performance.

#### SERVICE TEST

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

### **Conclusions for Areas Receiving Full-Scope Reviews**

Based on full-scope reviews, the bank's performance in the Bloomington MSA and IL Non-MSA is good.

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

## **Retail Banking Services**

	Distribution of Branch Delivery System											
	Deposits % of Rated	# of	Branches # of % of Location of Branches by						Population % of Population within Each			
Assessment	Area	BANK	Rated			ographies	-	70 01	Geography*			
Area	Deposits in AA	Branches	Area Branches in AA	Low	Mod	Mid	Upp	Low	Mod	Mid	Upp	
Bloomington MSA	5.5	2	7.7	0.0	50.0	50.0	0.0	1.3	23.3	47.5	19.7	
Champaign MSA	10.2	4	15.4	0.0	0.0	25.0	75.0	13.6	19.8	22.2	37.1	
Danville MSA	31.8	5	19.2	20.0	20.0	40.0	20.0	8.9	10.1	51.1	28.1	
IL Non-MSA	52.5	15	57.7	0.0	40.0	60.0	0.0	1.5	23.6	67.3	7.6	

<sup>\*</sup>FFB has some AAs that consists of geographies that have not been assigned an income classification.

### **Bloomington MSA**

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

The bank does not have any branches in low-income geographies. However, only 1.3 percent of the population resides in these tracts. The percentage of branches located in moderate-income CTs exceeds the percentage of population residing in moderate-income CTs.

#### IL Non-MSA

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

The bank does not have any branches in low-income geographies. However, only 1.5 percent of the population resides in these tracts. The percentage of branches located in moderate-income CTs exceeds the percentage of population residing in moderate-income CTs.

	Distribution of Branch Openings/Closings								
		Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or - )						
			Low	Mod	Mid	Upp			
Bloomington MSA	0	1	0	0	-1	0			
Champaign MSA	0	0	0 0 0						
Danville MSA	0	1	0 0 -1 0						
IL Non-MSA	0	4	0	-3	0	-1			

To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

In addition to branches, FFB provides ADS including ATMs, internet banking, mobile banking, banking by telephone, bank by mail, and debit cards.

### **Bloomington MSA**

FFB's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. The bank opened no branches during the evaluation period and closed one branch of which was in a middle-income CT. The branch closure was the result of declining customer usage.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AAs, particularly low- and moderate-income geographies and/or individuals. FFB maintained standard business hours at all branch locations in the AA with extended hours offered on Fridays. However, one of the two branches in the AA does not offer Saturday hours, including one in a moderate-income geography. All locations had drive-up facilities and offer night deposit services.

#### IL Non-MSA

FFB's opening and closing of branches has adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. The bank opened no branches during the evaluation period and closed four branches, three of which were in a moderate-income CT. Branch closures were the result of declining customer usage. However, the bank still maintains more branches in moderate-income CTs than the population that resides in those tracts.

Services, including where appropriate, business hours, do not vary in a way that inconveniences, its AAs, particularly low- and moderate-income geographies and/or individuals. FFB maintained standard business hours at all branch locations in the AA with extended hours offered on Fridays. Seven of the 15 branches in the AA do not offer Saturday hours, including one in a moderate-income geography. All locations had drive-up facilities and offer night deposit services.

### **Community Development Services**

The institution provides an adequate level of CD services.

### **Bloomington MSA**

The institution provided few, if any, CD services.

There were no CD service activities in the Bloomington MSA during the evaluation period.

#### IL Non-MSA

The institution provides an adequate level of CD services. During the evaluation period, five FFB employees provided 306 qualified CD service hours in the IL Non-MSA. Leadership was evident through board or committee participation with four bank employees providing 144 service hours during the evaluation period. The bank's assistance was responsive to identified needs in the AA.

Examples of CD services in the AA include:

- A bank employee provided 30 hours of board services to an organization that provides mental and behavioral health services in a distressed and underserved CT.
- A bank employee provided 18 hours of board services to an organization that supports economic development and revitalization.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the Champaign MSA and Danville MSA is consistent with the bank's overall performance under the Service Test in the full-scope areas. The Danville MSA had the second largest deposit and lending activity in the state of Illinois. The percentage of branches located in low- and moderate-income CTs in the Danville MSA exceeds the percentage of population residing in those CTs. The bank did not close any branches in the Danville MSA in low- or moderate-income CTs during the evaluation period. Performance in the Danville MSA provides additional support for the overall High Satisfactory Service Test rating.

#### State of Indiana

CRA rating for the State of Indiana: 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 activity levels reflect excellent responsiveness to community credit needs.

- The bank exhibits a good geographic distribution of loans in its AAs. FFB also exhibits a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- FFB is a leader in CD lending, which had a positive impact on the rating.
- The bank has a significant level of qualified CD investments.
- Service delivery systems are accessible to geographies and individuals of different income levels in the bank's AA.
- The bank is a leader in providing CD services.

## **Description of Institution's Operations in Indiana**

FFB delineated four AAs in the state of Indiana. The AAs included a portion of the Evansville MSA, a portion of the Indianapolis MSA, the entire Terre Haute MSA, and three nonmetropolitan counties comprising the IN Non-MSA (Daviess, Greene, and Knox). Refer to appendix A for a complete list of counties included in each AA.

As December 31, 2023, FFB had 22 branches and 48 ATMs, of which 32 were deposit-taking, within the Indiana AAs. During the evaluation period, the bank made \$568.8 million in home mortgage loans, small loans to businesses, and small loans to farms inside the Indiana AAs, which represented 67.2 percent of the total loan originations inside all AAs. By number of loans, FFB made 5,573 home mortgage loans, small loans to businesses, and small loans to farms inside the Indiana AAs, which represented 68.4 percent of the total originations inside all AAs. Within the Indiana AAs, home mortgage represented the largest percentage by number of loans with 48.6 percent of total originations as home mortgage, followed by small loans to businesses at 36.2 percent.

The state of Indiana represented FFB's largest rated area in terms of deposits. Based on June 30, 2023, FDIC Summary of Deposit information, FFB had \$2.3 billion in deposits in these AAs, which represented 57 percent of the bank's total deposits. The bank ranked third in deposit market share with 14 percent out of 30 depository institutions in the combined Indiana AAs. The top two competitors above FFB included Old National Bank with 21 branches and 27.5 percent market share and United Fidelity Bank, Federal Savings Bank (F.S.B.) with five branches and 21.5 percent market share.

### Evansville MSA

The Evansville MSA consisted of Vanderburgh County, one of three counties in the Evansville MSA. FFB had one branch and one full-service ATM in the AA, both located in an upper-income CT. Based on the number of loans originated or purchased inside the Indiana AAs during the evaluation period, the Evansville MSA represented the smallest percentage of total originations and purchases of home mortgage loans, small loans to businesses, and small loans to farms at 1.4 percent.

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

Table A – Der	nographic I	nformation	of the Assessn	nent Area					
Ass	essment Arc	ea: 2021 Eva	ansville MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #			
Geographies (Census Tracts)	49	20.4	26.5	30.6	18.4	4.1			
Population by Geography	181,305	14.0	25.7	33.2	26.9	0.3			
Housing Units by Geography	83,329	15.2	28.0	32.8	23.6	0.4			
Owner-Occupied Units by Geography	46,954	9.5	19.6	35.5	35.3	0.1			
Occupied Rental Units by Geography	27,263	20.8	40.2	30.5	7.7	0.8			
Vacant Units by Geography	9,112	28.0	34.9	25.3	10.9	0.8			
Businesses by Geography	16,012	11.6	26.4	28.7	26.8	6.6			
Farms by Geography	465	7.5	16.6	26.5	48.2	1.3			
Family Distribution by Income Level	45,063	24.1	18.7	19.9	37.3	0.0			
Household Distribution by Income Level	74,217	25.8	18.5	17.7	38.1	0.0			
Median Family Income MSA - 21780 Evansville, IN-KY MSA		\$61,595	Median Housi	ng Value		\$112,086			
	Median Gross Rent								
			Families Belo	Families Below Poverty Level					

Source: 2015 ACS and 2021 D&B Data

Due to rounding, totals may not equal 100.0%

<sup>(\*)</sup> The NA category consists of geographies that have not been assigned an income classification.

Table A – Den	nographic I	nformation	of the Assessn	nent Area		
Assess	ment Area:	2022-2023 1	Evansville MS	A		
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	59	16.9	28.8	28.8	15.3	10.2
Population by Geography	180,136	12.4	30.5	31.9	25.0	0.3
Housing Units by Geography	84,478	14.3	32.1	32.4	20.6	0.6
Owner-Occupied Units by Geography	49,328	8.6	27.1	37.7	26.3	0.3
Occupied Rental Units by Geography	26,766	20.0	40.0	26.5	12.9	0.7
Vacant Units by Geography	8,384	29.5	37.0	20.0	11.6	1.9
Businesses by Geography	20,205	11.7	27.9	26.1	25.2	9.1
Farms by Geography	604	5.6	20.5	37.6	32.9	3.3
Family Distribution by Income Level	45,548	24.4	19.2	20.8	35.7	0.0
Household Distribution by Income Level	76,094	26.1	17.9	18.5	37.5	0.0
Median Family Income MSA - 21780 Evansville, IN-KY MSA		\$72,963	Median Housi	ng Value		\$125,870
			Median Gross	Rent		\$824
			Families Belo	w Poverty Le	vel	11.0%

Source: 2020 U.S. Census and 2023 D&B Data

### Demographic Data

As of the 2020 U.S. Census data in the table above, the population of the Evansville MSA was 180,136, with 12.4 percent living in low-income CTs, 30.5 percent in moderate-income CTs, 31.9 percent in middle-income CTs, and 25 percent in upper-income CTs. Additionally, 0.3 percent of the population lived in CTs that had not been assigned an income classification. The AA consisted of 59 CTs with 10 low-income CTs, 17 moderate-income CTs, 17 middle-income CTs, nine upper-income CTs, and six CTs had not been assigned an income classification. Four of the CTs which had not been assigned an income classification are either state or federal protected lands. The AA included 45,548 families and 76,094 households.

#### Affordable Housing Cost

Examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the weighted average of the FFIEC updated MSA median family income, low-income families earned less than \$39,200 in 2021, \$41,850 in 2022, and \$43,650 in 2023 and moderate-income families earned less than \$62,720 for 2021, \$66,960 in 2022, and \$69,840 for 2023. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payments of no more than 30 percent of the applicant's income based on assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners' insurance, real estate taxes, or any additional monthly expenses. Using these assumptions, a low-income borrower could afford a maximum mortgage payment of \$980 per month in 2021, \$1,046 per month in 2022, and \$1,091 per month in 2023. A moderate-income borrower could afford a maximum payment of \$1,568 per month in 2021, \$1,674 per month in 2022, and \$1,746 per month in 2023. According to Realtor.com in 2023, the

Due to rounding, totals may not equal 100.0% (\*) The NA category consists of geographies that have not been assigned an income classification.

median home value would result in a monthly payment of \$1,270. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA.

Examiners considered the poverty level across the AA in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For the Evansville MSA, the poverty level according to the 2015 ACS was 12.3 percent and declined to 11 percent based on the 2020 U.S. Census data.

Housing availability in the AA posed challenges to lending in low- and moderate-income geographies. As of the 2020 U.S. Census, total occupied rental units in the AA were 31.7 percent (60 percent in low- and moderate-income CTs) of available units. An additional barrier to available units was the volume of vacant units of 9.9 percent (66.5 percent in low- and moderate-income CTs) of total housing units. Owner-occupied units in the AA accounted for 58.4 percent of total housing units, with 35.7 percent in low- and moderate-income CTs.

#### Job Market and Economic Conditions

According to the U.S. Bureau of Labor Statistics, the average annual unemployment rate for the state of Indiana and the Evansville MSA gradually improved during the evaluation period. Comparatively, the unemployment rates for the Evansville MSA were commensurate with or lower than the state of Indiana. The following table summarizes these unemployment rates.

Average Annual Unemployment Rates								
2021 2022 2023								
State of Indiana	3.9	3.1	3.3					
Evansville MSA 3.7 3.1 3.2								
Source: U.S. Bureau of Labor Statistics; Rates Not Seasonally Adjusted.								

According to the October 2023 Moody's Analytics Report, the AA strengths are a large and growing healthcare industry, high earnings in dominant manufacturing, concentration of educational institutions, and low business costs. The leading industries by wage tier include offices of physicians, management of companies and enterprises, resin, synthetics, rubber, fibers, and filament manufacturing, and the federal government. Major employers include Deaconess Hospital, Toyota Motor Manufacturing Indiana Inc., St. Vincent, Berry Global, and University of Southern Indiana.

### Competition

Investment opportunities are highly competitive. Many community banks tend to purchase mortgage backed securities with home mortgages to low- and moderate-income people or loans in low- and moderate-income geographies, affordable housing multifamily properties, or SBA loan pools in their AAs. CD lending opportunities are available, including opportunities to partner with nonprofit organizations with a CD mission or purpose. There are numerous nonprofits that provide various services to low- and moderate-income people or small businesses, such as affordable housing, financial literacy education, and support for economic development activities.

According to the FDIC Summary of Deposits as of June 30, 2023, FFB had \$45.6 million in deposits in the AA which comprised 1.1 percent of total bank deposits. Competition was moderate with 13 total FDIC insured financial institutions operating 49 offices in the AA. The top competitors were United

Fidelity Bank, F.S.B. with five branches in the AA and 36.2 percent market share, Old National Bank with 12 branches in the AA and 34.7 percent market share, and Fifth Third Bank, N.A. with nine branches in the AA and 16.3 percent market share.

#### Community Contacts/Credit Needs

Examiners reviewed information provided from three community contacts to understand the AA's needs and opportunities. The contacts represented organizations focused on local economic development and small business development. Community contacts indicated a need for affordable housing, market rate housing for all income levels, and general revitalization of current housing. There is also a need for education and support services for women and minority owned businesses.

### Indianapolis MSA

The Indianapolis MSA consisted of Putnam County, one of 11 counties in the Indianapolis MSA. FFB had one branch and one full-service ATM in the Indianapolis MSA, both located in a moderate-income CT. Based on the number of loans originated or purchased inside the Indiana AAs during the evaluation period, the Indianapolis MSA represented the second smallest percentage of total originations and purchases of home mortgage loans, small loans to businesses, and small loans to farms at 3.1 percent.

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

Table A – Den	Table A – Demographic Information of the Assessment Area							
Asse	ssment Area	a: 2021 Indi	anapolis MSA					
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #		
Geographies (Census Tracts)	7	0.0	14.3	85.7	0.0	0.0		
Population by Geography	37,650	0.0	16.3	83.7	0.0	0.0		
Housing Units by Geography	14,774	0.0	17.1	82.9	0.0	0.0		
Owner-Occupied Units by Geography	9,320	0.0	18.2	81.8	0.0	0.0		
Occupied Rental Units by Geography	3,329	0.0	16.6	83.4	0.0	0.0		
Vacant Units by Geography	2,125	0.0	12.8	87.2	0.0	0.0		
Businesses by Geography	2,627	0.0	17.7	82.3	0.0	0.0		
Farms by Geography	225	0.0	23.1	76.9	0.0	0.0		
Family Distribution by Income Level	9,002	20.5	22.6	21.7	35.2	0.0		
Household Distribution by Income Level	12,649	20.8	18.9	19.7	40.5	0.0		
Median Family Income MSA - 26900 Indianapolis-Carmel-Anderson, IN MSA		\$66,803	Median Housi	ng Value		\$122,432		
			Median Gross	Rent		\$701		
			Families Belo	w Poverty Le	vel	6.9%		

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.

Table A – Den	Table A – Demographic Information of the Assessment Area							
Assessn	ient Area: 2	2022-2023 Iı	ndianapolis M	SA				
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #		
Geographies (Census Tracts)	9	0.0	22.2	77.8	0.0	0.0		
Population by Geography	36,726	0.0	19.9	80.1	0.0	0.0		
Housing Units by Geography	15,188	0.0	18.8	81.2	0.0	0.0		
Owner-Occupied Units by Geography	10,108	0.0	14.2	85.8	0.0	0.0		
Occupied Rental Units by Geography	3,543	0.0	39.8	60.2	0.0	0.0		
Vacant Units by Geography	1,537	0.0	0.8	99.2	0.0	0.0		
Businesses by Geography	3,299	0.0	19.0	81.0	0.0	0.0		
Farms by Geography	286	0.0	9.4	90.6	0.0	0.0		
Family Distribution by Income Level	9,593	21.0	23.5	25.9	29.6	0.0		
Household Distribution by Income Level	13,651	23.5	16.7	22.8	37.1	0.0		
Median Family Income MSA - 26900 Indianapolis-Carmel-Anderson, IN MSA		\$80,981	Median Housi	ng Value		\$140,201		
			Median Gross	Rent		\$756		
			Families Belo	w Poverty Le	vel	6.1%		

Source: 2020 U.S. Census and 2023 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.

#### Demographic Data

As of the 2020 U.S. Census data in the table above, the population of the Indianapolis MSA was 36,726, with 19.9 percent in moderate-income CTs and 80.1 percent in middle-income CTs. The AA consisted of nine CTs with two moderate-income CTs and seven middle-income CTs. The AA included 9,593 families and 13,651 households. There were no significant changes from the 2015 ACS.

#### Affordable Housing Cost

Examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the weighted average of the FFIEC updated MSA median family income, low-income families earned less than \$39,850 in 2021, \$45,950 in 2022, and \$48,650 in 2023 and moderate-income families earned less than \$63,760 for 2021, \$73,520 in 2022, and \$77,840 for 2023. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payments of no more than 30 percent of the applicant's income based on assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners' insurance, real estate taxes, or any additional monthly expenses. Using these assumptions, a low-income borrower could afford a maximum mortgage payment of \$996 per month in 2021, \$1,149 per month in 2022, and \$1,216 per month in 2023. A moderate-income borrower could afford a maximum payment of \$1,594 per month in 2021, \$1,838 per month in 2022, and \$1,946 per month in 2023. According to Realtor.com in 2023, the median home value would result in a monthly payment of \$1,637. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA.

Examiners considered the poverty level across the AA in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For the Indianapolis MSA, the poverty level according to the 2015 ACS was 6.9 percent and declined to 6.1 percent based on the 2020 U.S. Census data.

Housing availability in the AA posed challenges to lending in moderate-income geographies. As of the 2020 U.S. Census, total occupied rental units in the AA were 23.3 percent (39.8 percent in moderate-income CTs) of available units. Owner-occupied units in the AA accounted for 66.6 percent of total housing units, with 14.2 percent in moderate-income CTs.

#### Job Market and Economic Conditions

According to the U.S. Bureau of Labor Statistics, the average annual unemployment rate for the state of Indiana and the Indianapolis MSA gradually improved during the evaluation period. Comparatively, the unemployment rate for the Indianapolis MSA was lower than the state of Indiana. The following table summarizes these unemployment rates.

Average Annual Unemployment Rates								
2021 2022 2023								
State of Indiana	3.9	3.1	3.3					
Indianapolis MSA	Indianapolis MSA 3.8 2.8 3.0							
Source: U.S. Bureau of Labo	r Statistics; Rates Not Seaso	onally Adjusted.						

According to the February 2024 Moody's Analytics report, the AA strengths are diversified industrial structure and well-developed distribution network, in-demand and growing pharmaceutical industry, high birthrate, strong migration trends, and low business and living costs. The leading industries by wage tier include offices of physicians, computer systems design and related services, insurance carriers, and the federal government. Major employers include Indiana University Health, St. Vincent Hospitals and Health Services, Community Health Network, Eli Lilly and Co., and Walmart Inc.

## Competition

Investment opportunities are highly competitive. Many community banks tend to purchase mortgage backed securities with home mortgages to low- and moderate-income people or loans in low- and moderate-income geographies, affordable housing multifamily properties, or SBA loan pools in their AAs. CD lending opportunities are available, including opportunities to partner with nonprofit organizations with a CD mission or purpose. There are numerous nonprofits that provide various services to low- and moderate-income people or small businesses, such as affordable housing, financial literacy education, and support for economic development activities.

According to the FDIC Summary of Deposits as of June 30, 2023, FFB had \$41.1 million in deposits in the AA which comprised one percent of total bank deposits. Competition was moderate with seven total FDIC insured financial institutions operating 12 offices in the AA. The top competitors were First National Bank with three branches and 36.5 percent market share, Old National Bank with one branch and 22.1 percent market share, and Tri-County Bank & Trust Company with three branches and 12.1 percent market share.

#### Community Contacts/Credit Needs

Examiners reviewed information provided from one community contact to understand the AA's needs and opportunities. The contact represented an organization focused on small business development. Community contacts indicated a need for working capital and long-term financing. Additional opportunities include involvement in financial literacy for small business education, especially in-person training.

#### Terre Haute MSA

The Terre Haute MSA consisted of Clay, Parke, Sullivan, Vermillion, and Vigo counties, the entire Terre Haute MSA. FFB had 17 branches and 40 ATMs, 27 of which were full-service ATMs. Three branches and four ATMs were in moderate-income CTs. During the evaluation period, FFB closed eight branches, one in a moderate-income CT, five in middle-income CTs, and two in an upper-income CT. Based on the number of loans originated or purchased inside the Indiana AAs during the evaluation period, the Terre Haute MSA represented the largest percentage of total originations and purchases of home mortgage loans, small loans to businesses, and small loans to farms at 81.5 percent.

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

Table A – Den	nographic II	nformation	of the Assessn	ient Area		
Asse	ssment Area	ı: 2021 Terr	e Haute MSA			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	48	8.3	20.8	47.9	22.9	0.0
Population by Geography	189,032	4.4	19.3	47.6	28.7	0.0
Housing Units by Geography	82,448	4.5	18.9	49.5	27.1	0.0
Owner-Occupied Units by Geography	47,636	2.4	13.8	52.3	31.5	0.0
Occupied Rental Units by Geography	23,196	8.5	29.1	41.1	21.3	0.0
Vacant Units by Geography	11,616	5.0	19.6	54.7	20.6	0.0
Businesses by Geography	11,699	5.6	19.1	45.4	30.0	0.0
Farms by Geography	841	1.3	8.3	56.7	33.7	0.0
Family Distribution by Income Level	45,948	21.2	18.2	20.5	40.0	0.0
Household Distribution by Income Level	70,832	24.7	16.6	17.2	41.5	0.0
Median Family Income MSA - 45460 Terre Haute, IN MSA		\$53,117	Median Housi	ng Value		\$90,860
			Median Gross	Rent		\$667
			Families Belov	w Poverty Lev	vel	12.6%

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.

Table A – Den	nographic I	nformation	of the Assessn	nent Area		
Assessn	nent Area: 2	022-2023 Т	erre Haute M	SA		
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	56	7.1	23.2	41.1	26.8	1.8
Population by Geography	185,031	4.0	20.7	45.1	28.0	2.2
Housing Units by Geography	83,871	5.0	21.0	43.8	29.2	1.1
Owner-Occupied Units by Geography	50,834	2.7	17.9	48.4	30.9	0.0
Occupied Rental Units by Geography	22,645	9.5	29.8	36.5	21.3	3.0
Vacant Units by Geography	10,392	6.2	16.8	37.2	38.0	1.9
Businesses by Geography	14,964	5.0	15.4	46.4	28.0	5.1
Farms by Geography	1,042	1.3	10.6	53.4	34.6	0.1
Family Distribution by Income Level	46,843	21.4	17.6	21.6	39.4	0.0
Household Distribution by Income Level	73,479	24.1	16.5	18.3	41.1	0.0
Median Family Income MSA - 45460 Terre Haute, IN MSA		\$63,958	Median Housi	ng Value		\$102,288
			Median Gross	Rent		\$749
			Families Belo	w Poverty Le	vel	11.5%

Source: 2020 U.S. Census and 2023 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.

## <u>Demographic Data</u>

As of the 2020 U.S. Census data in the table above, the population of the Terre Haute MSA was 185,031, with four percent living in low-income CTs, 20.7 percent in moderate-income CTs, 45.1 percent in middle-income CTs, and 28 percent in upper-income CTs. Additionally, 2.2 percent of the population lived in a CT that had not been assigned an income classification. The AA consisted of 56 CTs with four low-income CTs, 13 moderate-income CTs, 23 middle-income CTs, 15 upper-income CTs, and one CT had not been assigned an income classification. The AA included 46,843 families and 73,479 households. The major changes from the 2015 ACS to the 2020 U.S. Census are an increase in the number of CTs from 48 to 56 and an increase in the number of moderate-income CTs from 10 to 13. Additionally, the population decreased by two percent.

#### Affordable Housing Cost

Examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the weighted average of the FFIEC updated MSA median family income, low-income families earned less than \$30,650 in 2021, \$34,500 in 2022, and \$40,150 in 2023 and moderate-income families earned less than \$49,040 for 2021, \$55,200 in 2022, and \$64,240 for 2023. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payments of no more than 30 percent of the applicant's income based on assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners' insurance, real estate taxes, or any additional monthly expenses. Using these assumptions, a low-income borrower could afford a maximum mortgage payment of \$766 per month in 2021, \$863 per month in 2022, and \$1,004 per month in 2023. A moderate-income borrower could afford a maximum payment of \$1,226 per month in 2021, \$1,380 per month in 2022, and \$1,606 per month in 2023. According to Realtor.com in 2023, the

median home value would result in a monthly payment of \$950. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA.

Examiners considered the poverty level across the AA in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For the Terre Haute MSA, the poverty level according to the 2015 ACS was 12.6 percent and declined to 11.5 percent based on the 2020 U.S. Census data.

Housing availability in the AA posed challenges to lending in low- and moderate-income geographies. As of the 2020 U.S. Census, total occupied rental units in the AA were 27 percent (39.3 percent in low- and moderate-income CTs) of available units. An additional barrier to available units was the volume of vacant units of 12.4 percent (23 percent in low- and moderate-income CTs) of total housing units. Owner-occupied units in the AA accounted for 60.6 percent of total housing units, with 20.6 percent in low- and moderate-income CTs.

#### Job Market and Economic Conditions

According to the U.S. Bureau of Labor Statistics, the average annual unemployment rate for the state of Indiana and the Terre Haute MSA gradually improved during the evaluation period. Comparatively, the unemployment rate for the Terre Haute MSA was higher than the state of Indiana. The following table summarizes these unemployment rates.

Average Annual Unemployment Rates								
2021 2022 2023								
State of Indiana	3.9	3.1	3.3					
Terre Haute MSA 4.5 3.6 3.8								
Source: U.S. Bureau of Labo	r Statistics; Rates Not Seaso	nally Adjusted.						

According to the October 2023 Moody's Analytics Report, the AA strengths are presence of two universities, low housing and business costs, and below-average living costs. The leading industries by wage tier include the federal government, offices of physicians, electrical power generation, and management of companies and enterprises. Major employers include Union Hospital Health Care Group, Indiana State University, Terre Haute Regional Hospital, and Union Associated Physicians.

#### Competition

Investment opportunities are highly competitive. Many community banks tend to purchase mortgage backed securities with home mortgages to low- and moderate-income people or loans in low- and moderate-income geographies, affordable housing multifamily properties, or SBA loan pools in their AAs. CD lending opportunities are available, including opportunities to partner with nonprofit organizations with a CD mission or purpose. There are numerous nonprofits that provide various services to low- and moderate-income people or small businesses, such as affordable housing, financial literacy education, and support for economic development activities.

According to the FDIC Summary of Deposits as of June 30, 2023, FFB had \$2 billion in deposits in the AA which comprised 48.4 percent of total bank deposits and ranking first among all financial institutions. Competition was moderate with eight total FDIC insured financial institutions operating 48 offices in the AA. The next top three competitors were Old National Bank with five branches in the AA

and 14.8 percent market share, Fifth Third Bank, N.A. with five branches in the AA and 9.6 percent market share, and The Hometown Savings Bank with eight branches in the AA and 9.3 percent market share.

### Community Contacts/Credit Needs

Examiners reviewed information provided from one community contact to understand the AA's needs and opportunities. The contact represented an organization focused on CD. The community contact indicated a need for small loans to compete with predatory pay-day lenders who target the low-income population and affordable housing. Additional opportunities include financing for non-profit organizations in the community who support low- and moderate-income individuals and families.

## **Scope of Evaluation in Indiana**

Examiners selected three AAs for full-scope reviews: the Evansville, Indianapolis, and Terre Haute MSAs. The Terre Haute MSA received a full-scope review due to the concentration of deposits, branches, and lending while the Evansville and Indianapolis MSAs received full-scope reviews because they had not received a full-scope review at the last evaluation. The IN Non-MSA received a limited-scope review. Refer to the table in Appendix A for more information.

For the Evansville MSA, Indianapolis MSA, and IN Non-MSA, examiners placed more emphasis on small loans to businesses when drawing conclusions. In the Terre Haute MSA, examiners placed more emphasis on home mortgage loans. Examiners did not evaluate home mortgage loans in the Evansville MSA or small loans to farms in the Evansville MSA and Indianapolis MSA as the volumes were insufficient to conduct a meaningful analysis. The Terre Haute MSA is weighted more heavily in arriving at the overall conclusions for the state, as the bank's largest market share of loans (81.5 percent by number) and deposits (84.9 percent) is concentrated in the Terre Haute MSA. There were no low-income geographies in the Indianapolis MSA. All geographic conclusions are based solely on performance in moderate-income geographies.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN INDIANA

#### LENDING TEST

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

# **Conclusions for Areas Receiving Full-Scope Reviews**

Based on full-scope reviews, the bank's performance in the Terre Haute MSA is excellent, performance in the Evansville MSA is good, and performance in the Indianapolis MSA is adequate.

## **Lending Activity**

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans*										
	Home	Small	Small	Community		%State	%State			
Assessment Area	Mortgage	Business	Farm	Development	Total	Loans	Deposits			
Evansville MSA	19	59	0	1	79	1.4	1.9			
Indianapolis MSA	66	88	16	0	170	3.0	1.8			
Terre Haute MSA	2,399	1,513	628	17	4,557	81.5	84.9			
IN Non-MSA	223	358	204	1	786	14.0	11.4			
Statewide/Regional				2	3	0.1				
Area	-	-	-	3	3	0.1	-			
Total	2,707	2,018	848	22	5,595	100.0	100.0			

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

Dollar Volume of Loans* (\$000s)										
	Home	Small	Small	Community		%State*	%State			
Assessment Area	Mortgage	Business	Farm	Development	Total	Loans	Deposits			
Evansville MSA	3,489	13,688	0	10,000	27,177	4.5	1.9			
Indianapolis MSA	9,406	10,079	1,258	0	20,743	3.4	1.8			
Terre Haute MSA	223,486	148,867	70,686	10,245	453,284	74.4	84.9			
IN Non-MSA	17,691	45,707	24,444	4,000	91,842	15.1	11.4			
Statewide/Regional				16 006	16.006	2.6				
Area	-	-	-	16,006	16,006	2.6	-			
Total	254,072	218,341	96,388	40,251	609,052	100.0	100.0			

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

### Evansville MSA

Lending levels reflect good responsiveness to AA credit needs.

According to the FDIC Deposit Market Share data as of June 30, 2023, the bank ranked ninth among 13 financial institutions with a deposit market share of 0.5 percent, placing it in the top 70 percent of deposit-taking institutions.

According to the 2022 Peer Mortgage data, FFB held a 0.1 percent market share of mortgage loans, by number of loans, ranking 76<sup>th</sup> among 234 reporting lenders (top 32 percent of all lenders). The market share by dollar volume was also minimal at 0.1 percent, which is below the deposit share market. The top three lenders were Liberty Federal Credit Union with 16.8 percent market share, Mortgage Masters of Indiana with 8.3 percent market share, and Fifth Third Bank, N.A. with 7.5 percent market share.

According to the 2022 Peer Small Business data, FFB had a 0.5 percent market share of small loans to businesses by the number of loans and ranked 20<sup>th</sup> out of 69 reporting lenders (top 29 percent of all lenders). The market share by dollar volume of 1.7 percent is consistent with the deposit market share. The top three lenders were American Express National Bank with 17.7 percent market share, JPMorgan Chase Bank, N.A. with 11.8 percent market share, and Capital One, N.A. with 10.6 percent market share.

### Indianapolis MSA

Lending levels reflect excellent responsiveness to AA credit needs.

According to the FDIC Deposit Market Share data as of June 30, 2023, the bank ranked sixth among seven financial institutions with a deposit market share of 5.1 percent, placing it in the top 86 percent of deposit-taking institutions.

According to the 2022 Peer Mortgage data, FFB held a 2.1 percent market share of mortgage loans, by number of loans, ranking 14<sup>th</sup> among 151 reporting lenders (top nine percent of all lenders). The market share by dollar volume was 1.5 percent, which is consistent with the deposit share market in the AA. The top three lenders were Ruoff Mortgage Company with 12.9 percent market share, Teachers Credit Union with 5.6 percent market share, and First National Bank with 4.5 percent market share.

According to the 2022 Peer Small Business data, FFB had a 6.4 percent market share of small loans to businesses by the number of loans and ranked 5<sup>th</sup> out of 49 reporting lenders (top 10 percent of all lenders). The market share by dollar volume of 23.3 percent is greater than the bank's deposit market share in the AA. The top three lenders were American Express National Bank with 17.2 percent market share, JPMorgan Chase Bank, N.A. with 16.1 percent market share, and Capital One, N.A. with 10.6 percent market share.

#### Terre Haute MSA

Lending levels reflect excellent responsiveness to AA credit needs.

According to the FDIC Deposit Market Share data as of June 30, 2023, FFB ranked first out of eight depository institutions (top 13 percent) with a deposit market share of 51.9 percent.

According to the 2022 Peer Mortgage data, FFB held a 19 percent market share of mortgage loans, by number of loans, ranking first among 244 reporting lenders (top one percent of all lenders). The next top three lenders were Ruoff Mortgage Company with 11.1 percent market share, Fifth Third Bank, N.A. with 8.2 percent market share, and Riddell National Bank with 7.1 percent market share.

According to the 2022 Peer Small Business data, FFB had a 17 percent market share of small loans to businesses by the number of loans and ranked first out of 70 reporting lenders (top two percent). The next top three lenders were JPMorgan Chase Bank, N.A. with 13.4 percent market share, American Express National Bank with 13.2 percent market share, and Capital One, N.A. with 10.8 percent market share.

According to the 2022 Peer Small Farm data, FFB had a 42.7 percent market share of small loans to businesses by the number of loans and ranked first out of 17 reporting lenders (top six percent). The next top three lenders were John Deere Financial, FSB with 19.6 percent market share, First Farmers Bank & Trust with 13.9 percent market share, and JPMorgan Chase Bank, N.A. with 7.3 percent market share.

### Distribution of Loans by Income Level of the Geography

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

### Home Mortgage Loans

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.

#### Evansville MSA

The bank did not originate enough home mortgage loans to perform a meaningful analysis in the Evansville MSA during either analysis period.

## Indianapolis MSA

The geographic distribution of home mortgage loans in the Indianapolis MSA was adequate.

2021

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

2022 - 2023

The percentage of home mortgage loans in moderate-income geographies was significantly below the percentage of owner-occupied housing units located in those geographies and significantly below the aggregate percentage of all reporting lenders.

#### Terre Haute MSA

The geographic distribution of home mortgage loans in the Terre Haute MSA was good.

2021

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

2022 - 2023

The percentage of home mortgage loans in low-income geographies was below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans in moderate-income geographies exceeded the percentage of owner-occupied housing units located in those geographies and was near to the aggregate percentage of all reporting lenders.

#### Small Loans to Businesses

Refer to Table 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.

#### Evansville MSA

The geographic distribution of small loans to businesses in the Evansville MSA was adequate.

2021

The percentage of small loans to businesses in low-income geographies was significantly below both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

2022 - 2023

The bank did not originate any loans in low-income geographies. The percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

### Indianapolis MSA

The geographic distribution of small loans to businesses in the Indianapolis MSA was good.

2021

The percentage of small loans to businesses in moderate-income geographies was below the percentage of businesses located in those geographies and well below the aggregate percentage of all reporting lenders.

2022 - 2023

The percentage of small loans to businesses in moderate-income geographies was below the percentage of businesses located in those geographies and exceeded the aggregate percentage of all reporting lenders.

#### Terre Haute MSA

The geographic distribution of small loans to businesses in the Terre Haute MSA was excellent.

2021

The percentage of small loans to businesses in low-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

#### 2022 - 2023

The percentage of small loans to businesses in low-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

#### Small Loans to Farms

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.

#### Evansville MSA

The bank did not originate enough small loans to farms to perform a meaningful analysis.

### Indianapolis MSA

The bank did not originate enough small loans to farms to perform a meaningful analysis.

#### Terre Haute MSA

The geographic distribution of small loans to farms in the Terre Haute MSA was poor.

#### 2021

The bank did not originate any loans in low-income CTs; however, there were only 1.3 percent of farms in low-income geographies and no aggregate lending performance in the geography to compare performance to. There are limited opportunities to lend for small loans to farms in the low-income CTs. The percentage of small loans to farms in moderate-income geographies was significantly below the percentage of farms located in those geographies and below the aggregate percentage of all reporting lenders.

2022 - 2023

The bank did not originate any loans in low-income CTs, however, there were only 1.3 percent of farms in low-income geographies and no aggregate lending performance in the geography to compare performance to. The percentage of small loans to farms in moderate-income geographies was well below the percentage of farms located in those geographies and below the aggregate percentage of all reporting lenders.

### Lending Gap Analysis

Examiners analyzed geographic lending patterns of home mortgage loans, small loans to businesses, and small loans to farms by reviewing maps of loan originations and purchases throughout the AA. Examiners did not identify any conspicuous or unexplained gaps in lending.

## Distribution of Loans by Income Level of the Borrower

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

## Home Mortgage Loans

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.

#### Evansville MSA

The bank did not originate enough home mortgage loans to perform a meaningful analysis in the Evansville MSA during either analysis period. Competition for home mortgage loans in the Evansville MSA was strong, with the top three financial institutions holding almost 33 percent of the home mortgage market share, as discussed above.

### Indianapolis MSA

The bank's distribution of home mortgage loans to individuals of different income levels in the Indianapolis MSA was good.

2021

The percentage of home mortgage loans to low-income borrowers exceeded both the percentage of families and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers was near to both the percentage of families and the aggregate percentage of all reporting lenders.

2022 - 2023

The percentage of home mortgage loans to low-income borrowers was significantly below both the percentage of families and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of families and the aggregate percentage of all reporting lenders.

#### Terre Haute MSA

The distribution of home mortgage loans to individuals of different income levels in the Terre Haute MSA was excellent.

2021

The percentage of home mortgage loans to low-income borrowers was significantly below the percentage of families but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of families and the aggregate percentage of all reporting lenders.

#### 2022 - 2023

The percentage of home mortgage loans to low-income borrowers was well below the percentage of families but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of families and the aggregate percentage of all reporting lenders.

#### Small Loans to Businesses

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.

In determining conclusions, examiners gave consideration for opportunities to lend based on the level of competition and the number of non-farm businesses located within the AAs. Additionally, examiners considered the SBA PPP lending during the COVID-19 pandemic, which did not require borrowers to provide revenue information as part of the loan process. FFB was responsive to the SBA's PPP and originated a significant volume of PPP loans in 2021.

#### Evansville MSA

The distribution of small loans to businesses of different sizes in the Evansville MSA was adequate.

2021

This analysis included 15 PPP loans totaling \$2.2 million that helped support small businesses during the COVID-19 pandemic. The percentage of small loans to businesses with gross annual revenues of \$1 million or less was significantly below the percentage of businesses with revenues of \$1 million or less and was well below the aggregate percentage of all reporting lenders.

Examiners considered the impact of the high percentage of small loans to businesses with revenue information unavailable on the borrower distribution analysis. For 30.8 percent of small loans to businesses in the Evansville MSA, borrower revenue information was not available. The majority of the loans with unknown revenues were PPP loans which did not require the bank to collect or consider gross annual revenues.

2022 - 2023

The percentage of small loans to businesses with gross annual revenues of \$1 million or less was below the percentage of businesses with revenues of \$1 million or less but exceeded the aggregate percentage of all reporting lenders.

### Indianapolis MSA

The distribution of small loans to businesses of different sizes in the Indianapolis MSA was good.

2021

This analysis included 15 PPP loans totaling \$487,000 that helped support small businesses during the COVID-19 pandemic. The percentage of small loans to businesses with gross annual revenues of \$1

million or less was well below the percentage of businesses with revenues of \$1 million or less but exceeded the aggregate percentage of all reporting lenders.

Examiners considered the impact of the high percentage of small loans to businesses with revenue information unavailable on the borrower distribution analysis. For 25.6 percent of small loans to businesses in the Indianapolis MSA, borrower revenue information was not available. The majority of the loans with unknown revenues were PPP loans which did not require the bank to collect or consider gross annual revenues.

2022 - 2023

The percentage of small loans to businesses with gross annual revenues of \$1 million or less was well below the percentage of businesses with revenues of \$1 million or less but exceeded the aggregate percentage of all reporting lenders.

#### Terre Haute MSA

The distribution of small loans to businesses of different sizes in the Terre Haute MSA was adequate.

2021

This analysis included 851 PPP loans totaling \$34.5 million that helped support small businesses during the COVID-19 pandemic. The percentage of small loans to businesses with gross annual revenues of \$1 million or less was significantly below the percentage of businesses with revenues of \$1 million or less and was well below the aggregate percentage of all reporting lenders.

Examiners considered the impact of the high percentage of small loans to businesses with revenue information unavailable on the borrower distribution analysis. For 57.3 percent of small loans to businesses in the Terre Haute MSA, borrower revenue information was not available. The majority of the loans with unknown revenues were PPP loans which did not require the bank to collect or consider gross annual revenues.

2022 - 2023

The percentage of small loans to businesses with gross annual revenues of \$1 million or less was well below the percentage of businesses with revenues of \$1 million or less but exceeded the aggregate percentage of all reporting lenders.

#### Small Loans to Farms

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.

As discussed above, the bank experienced a lack of small farm loan originations in several metropolitan areas due to strong competition with the USDA FSA and USDA Rural Development offices located in the bank's footprint. These government programs may offer extended loan terms beyond FFB's loan policies. According to the 2022 Peer Small Farm data, John Deere Financial, F.S.B. held almost 47 percent of the small farm market share in the Evansville MSA and 27.6 percent in the Indianapolis MSA. Competition for small loans to farms is strong in the Indiana AAs.

#### Evansville MSA

The bank did not originate enough small loans to farms to perform a meaningful analysis in the Evansville MSA during either analysis period. Farm lending is not a primary product in the Evansville MSA.

### Indianapolis MSA

The bank did not originate enough small loans to farms to perform a meaningful analysis in the Indianapolis MSA during either analysis period. Farm lending is not a primary product in the Indianapolis MSA.

#### Terre Haute MSA

The distribution of small loans to farms of different sizes in the Terre Haute MSA was good.

2021

The percentage of small loans to farms with gross annual revenues of \$1 million or less was below the percentage of small farms with revenues of \$1 million or less but exceeded the aggregate percentage of all reporting lenders.

2022 - 2023

The percentage of small loans to farms with gross annual revenues of \$1 million or less was below the percentage of small farms with revenues of \$1 million or less but exceeded the aggregate percentage of all reporting lenders.

## **Community Development Lending**

The institution is a leader in making CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

#### Evansville MSA

The institution is a leader in making CD loans. FFB made one CD loan totaling \$10 million, which represented 172.8 percent of allocated tier 1 capital. This loan funded a 220-unit multifamily affordable housing complex in a moderate-income CT.

#### Indianapolis MSA

The institution has made few, if any, CD loans. FFB did not make any CD loans in the AA during the evaluation period.

#### Terre Haute MSA

The institution has made an adequate level of CD loans. CD lending had a positive impact on the overall lending test conclusion for the Terre Haute MSA. FFB made 17 loans totaling \$10.2 million, which represented 4.1 percent of allocated tier 1 capital. This total included four PPP loans totaling \$6.6 million that supported area businesses during the COVID-19 pandemic, nine economic development loans totaling \$2.3 million, and four affordable housing or community service loans totaling \$1.3 million.

### Examples of CD loans in the AA included:

- A \$200,000 line of credit to support a local community action agency targeted to support lowand moderate-income individuals and families in the AA.
- A \$1.3 million loan to support school improvements for a local school district in a moderate-income area, with more than 50 percent receiving free or reduced lunch.

## Statewide/Regional Area

Because the bank was responsive to CD needs and opportunities in the full-scope areas, broader statewide and regional loans that do not have a purpose, mandate, or function to serve the AAs received consideration in the assessment. During the evaluation period, FFB made three loans totaling \$16 million in the broader statewide region which represented 5.4 percent of allocated tier 1 capital for the state of Indiana. The loans included one PPP loan totaling \$2.8 million and two community service loans totaling \$13.2 million. These loans further support the overall Outstanding Lending Test rating in the state of Indiana.

### **Product Innovation and Flexibility**

The institution makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. Refer to the Other Information section under the Scope of the Evaluation for additional details on other flexible lending products.

#### Evansville MSA

The institution makes little use of innovative and/or flexible lending practices in order to serve AA credit needs. During the evaluation period, FFB made no loans among the various flexible home mortgage lending products available in the Evansville MSA. However, the bank made 15 PPP loans totaling \$2.2 million during 2021.

#### Indianapolis MSA

The institution makes little use of innovative and/or flexible lending practices in order to serve AA credit needs. During the evaluation period, FFB made one RHS/FSA loan totaling \$276,767 among the various flexible mortgage lending products available in the AA. The bank also made 15 PPP loans totaling \$487,000 during 2021.

### Terre Haute MSA

The institution makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. During the evaluation period, FFB made 70 loans totaling \$10.1 million among the various flexible mortgage lending products available in the Terre Haute MSA. This included 46 FHA loans totaling \$7.1 million, six VA loans totaling \$1.1 million, and 18 RHS/FSA loans totaling \$1.9 million. The bank also made 851 PPP loans totaling \$34.5 million during 2021.

# Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the IN Non-MSA is consistent with the bank's overall performance under the Lending Test in the full-scope areas.

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 Indiana is rated High Satisfactory.

### **Conclusions for Areas Receiving Full-Scope Reviews**

Based on full-scope reviews, the bank's performance in the Evansville MSA is excellent, performance in the Terre Haute MSA is good, and performance in the Indianapolis MSA is poor.

The institution has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

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

#### **Number and Amount of Qualified Investments**

Qualified Investments										
Assessment Area	Prio	r Period*	Curr	ent Period		T	Unfunded Commitments **			
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of	#	\$(000's)
								Total \$		
Evansville MSA	2	1,197	6	707	8	9.2	1,904	6.6	0	0
Indianapolis MSA	0	0	0	0	0	0.0	0	0.0	0	0
Terre Haute MSA	4	8,476	51	5,217	55	63.2	13,693	47.2	0	0
IN Non-MSA	0	0	14	94	14	16.1	94	0.3	0	0
Statewide/Regional Area	3	3,632	7	9,681	10	11.5	13,313	45.9	0	0
Total	9	13,305	78	15,699	87	100.0	29,004	100.0	0	0

<sup>\*</sup> Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

<sup>\*\*</sup> Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system. Due to rounding, totals may not equal 100.0%.

#### Evansville MSA

The bank has an excellent level of qualified CD investments 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 institution makes extensive use of innovative and/or complex investments to support CD initiatives.

During the evaluation period, FFB provided five investments totaling \$706,476 supporting affordable housing needs and one qualifying donation totaling \$800 for community services to low- and moderate-income individuals. The bank also held two prior-period investments supporting affordable housing needs and revitalization/stabilization projects with an outstanding balance of \$1.2 million. The dollar volume of current- and prior-period investments represented 32.9 percent of allocated tier 1 capital.

## Indianapolis MSA

The bank had a few, if any, qualified CD investments or grants, particularly those that are not routinely provided by private investors.

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

The bank had no prior period or current period qualified investments to consider during the evaluation period in the Indianapolis MSA.

#### Terre Haute MSA

The bank had a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

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

During the evaluation period, FFB provided two investments totaling \$5.2 million supporting affordable housing needs and 49 qualifying donations totaling \$182,009 supporting community services. The bank also held four prior-period investments supporting affordable housing needs and revitalization/stabilization projects with an outstanding balance of \$8.5 million. The dollar volume of current- and prior-period investments represented 5.4 percent of allocated tier 1 capital.

An example of a qualified investment in the AA included a \$5 million investment in a low-income housing tax credit (LIHTC) fund to construct a 40-unit housing complex. The property restricted 32 units to residents earning 60 percent or less of the AMI.

### Statewide/Regional Area

Because the bank was responsive to CD needs and opportunities in the full-scope areas, broader statewide and regional investments that do not have a purpose, mandate, or function to serve the AAs received consideration in the evaluation period. During the evaluation period, FFB held three prior period investments totaling \$3.6 million and seven current period investments totaling \$9.7 million in

the broader statewide region which represented 4.5 percent of allocated tier 1 capital for the state of Indiana. These investments provide additional support for the High Satisfactory Investment Test rating in the state of Indiana.

## **Conclusions for Area Receiving a Limited-Scope Review**

Based on a limited-scope review, the bank's performance under the Investment Test in the IN Non-MSA is weaker than the overall performance in the full-scope areas due to a lower level of CD investments. Weaker performance did not impact the Investment Test rating for the state of Indiana.

### SERVICE TEST

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

## **Conclusions for Areas Receiving Full-Scope Reviews**

Based on a full-scope review, the bank's performance in the Terre Haute MSA and Indianapolis MSA is good while performance in the Evansville MSA is adequate.

### **Retail Banking Services**

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

Assessment	Deposits % of Rated Area	# of % of Location of Branches by BANK Rated Income of Geographies (%)**					Population % of Population within Each Geography***				
Area	Deposits in AA	Branches	Area Branches in AA*	Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Evansville MSA	1.9	1	4.5	0.0	0.0	0.0	100.0	12.4	30.5	31.9	25.0
Indianapolis MSA	1.8	1	4.5	0.0	100.0	0.0	0.0	0.0	19.9	80.1	0.0
Terre Haute MSA	84.9	17	77.3	0.0	17.6	58.8	17.6	4.0	20.7	45.1	28.0
IN Non- MSA	11.4	3	13.6	0.0	33.3	66.7	0.0	2.9	16.2	64.1	16.8

<sup>\*</sup>Due to rounding, totals may not equal 100 percent.

### Evansville MSA

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

The bank does not have any branches in low- or moderate-income geographies; however, the bank only has one branch in the AA. FFB also has one loan production office in the Evansville MSA located in a

<sup>\*\*</sup>FFB has one branch in the Terre Haute MSA that is in a CT with an unknown income classification.

<sup>\*\*\*</sup>FFB has some AAs that consists of geographies that have not been assigned an income classification.

moderate-income CT to provide lending services to customers. FFB complements its branches with ATMs, internet banking, mobile banking, banking by telephone, and banking by mail.

FFB offered ADS including ATMs, Call Center, and digital banking (online/mobile). These systems provided additional delivery availability and access to banking services to both retail and business customers. FFB had one full-service ATM in the AA located in an upper-income geography.

### Indianapolis MSA

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

The bank's distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies. The bank only has one branch in the AA. FFB complements its branches with ATMs, internet banking, mobile banking, banking by telephone, and banking by mail.

FFB offered ADS including ATMs, Call Center, and digital banking (online/mobile). These systems provided additional delivery availability and access to banking services to both retail and business customers. FFB had one full-service ATM in the AA located in a moderate-income geography.

#### Terre Haute MSA

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

The bank's distribution of branches in moderate-income geographies was near to the percentage of the population living within those geographies. The bank had no branches in low-income geographies; however, only four percent of the population lived within this geography.

FFB offered ADS including ATMs, Call Center, and digital banking (online/mobile). These systems provided additional delivery availability and access to banking services to both retail and business customers. FFB had 40 ATMs in the AA, 27 of which were deposit-taking. The distribution of ATMs in low-income geographies was very poor and in moderate-income geographies was excellent.

	Distribution of Branch Openings/Closings										
	Branch Openings/Closings										
Assessment Area	# of Branch Openings	Closings (+ or - )									
			Low	Mod	Mid	Upp					
Evansville MSA	0	0	0	0	0	0					
Indianapolis MSA	0	0	0	0	0	0					
Terre Haute MSA	0	8	0 -1 -5 -2								
IN Non-MSA	0	1	0	0	-1	0					

To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

#### Evansville MSA

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

Services, including where appropriate, business hours, do not vary in a way that inconveniences, its AAs, particularly low- and moderate-income geographies and/or individuals. FFB maintained standard business hours at its branch location in the AA with extended hours offered on Fridays. The branch does not offer Saturday hours but had drive-up facilities and night deposit services.

### <u>Indianapolis MSA</u>

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

Services, including where appropriate, business hours, do not vary in a way that inconveniences, its AAs, particularly low- and moderate-income geographies and/or individuals. FFB maintained standard business hours at its branch location in the AA with extended hours offered on Fridays. The branch offers Saturday hours, drive-up facilities, and night deposit services.

#### Terre Haute MSA

FFB's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and low- and moderate-income individuals. The bank opened no branches during the evaluation period and closed eight branches, one of which was in a moderate-income CT. Branch closures were the result of declining customer usage over an extended period of time.

Services, including where appropriate, business hours, do not vary in a way that inconveniences, its AAs, particularly low- and moderate-income geographies and/or individuals. FFB maintained standard business hours at all branch locations in the AA with extended hours offered on Fridays. Two of the 17 branches in the AA do not offer Saturday hours. All locations had drive-up facilities and offer night deposit services.

### **Community Development Services**

The institution is a leader in providing CD services.

#### Evansville MSA

The bank provided an adequate level of CD services. During the evaluation period, one FFB employee provided 36 qualified CD service hours for one organization that provides community services in the Evansville MSA.

## Indianapolis MSA

The bank provided a relatively high level of CD services. During the evaluation period, one FFB employee provided 132 qualified CD service hours to two organizations in the Indianapolis MSA. This senior employee was a board member on two local community action organizations supporting low- and moderate-income individuals and families.

#### Terre Haute MSA

The bank was a leader in providing CD services. During the evaluation period, 30 FFB employees provided approximately 4,600 qualified CD service hours to 34 organizations in the Terre Haute MSA. Leadership was evident through board or committee participation with 33 bank employees providing 2,874 service hours during the evaluation period. The bank's assistance was responsive to identified needs in the AA.

Examples of CD services in the AA included:

- A senior officer provided 198 hours of board service to two organizations that provide mental and behavioral health services and other resources to primarily low- and moderate-income individuals.
- A senior officer provided 108 hours of board service to two organizations that provide workforce development assistance and health services for low- and moderate-income individuals.

## **Conclusions for Area Receiving a Limited-Scope Review**

Based on a limited-scope review, the bank's performance under the Service Test in the IN Non-MSA is consistent with the bank's overall performance under the Service Test in the full-scope areas.

# **State of Kentucky**

CRA rating for the State of Kentucky: Satisfactory
The Lending Test is rated: Low Satisfactory
The Investment Test is rated: Outstanding
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 an adequate geographic distribution of loans in its AAs. The bank exhibits an
  adequate distribution of loans among individuals of different income levels and businesses of
  different sizes.
- The institution has made a relatively high level of CD loans overall.
- FFB has an excellent level of qualified CD investments.
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's AAs.
- FFB is a leader in CD services.

# **Description of Institution's Operations in Kentucky**

FFB delineated three AAs within the state of Kentucky. They include portions of the Owensboro, KY and Bowling Green, KY MSAs and six nonmetropolitan counties in the KY Non-MSA. Refer to appendix A for a complete list of counties included in each AA.

During the evaluation period, Fulton, Breckinridge and Todd Counties had one to five CTs included on the FFIEC List of Distressed or Underserved Nonmetropolitan Middle-Income Geographies for each year of the evaluation period. These counties were either distressed due to unemployment, poverty, population loss, or underserved due to remote rural location. These counties are located within the KY Non-MSA.

Hancock County (Owensboro MSA), Warren County (Bowling Green MSA), Breckinridge County (KY Non-MSA), and Hopkins County (KY Non-MSA) were added to the bank's AAs through an acquisition in November 2021.

According to the June 30, 2023, FDIC Summary of Deposit information, FFB had \$469.6 million in deposits in these AAs, which represented 11.4 percent of the bank's total deposits. The bank ranked sixth in deposit market share with 5.9 percent out of 37 depository institutions in the combined Kentucky AAs. The top three competitors included Community Financial Services Bank with five branches and 11 percent market share, U.S. Bank, N.A. with 11 branches and 10 percent market share, and Truist Bank with four branches and 9.7 percent market share.

As of December 31, 2023, FFB had 12 branches, a remote drive-up facility, and 11 ATMs, of which six were full-service ATMs. During the evaluation period, the bank made \$63.7 million in home mortgage loans, small loans to businesses, and small loans to farms in the Kentucky AAs, which represented 7.5 percent of the total loan originations inside all AAs. By number of loans, FFB made 567 home mortgage, small loans to businesses, and small loans to farms inside the AAs, which represented seven percent of the total originations inside all AAs. Based on number of loans, home mortgage represented the largest percentage of originations with 49.7 percent of total originations, followed by small loans to businesses at 37.6 percent. The KY Non-MSA represented the largest percentage of total originations at 77.3 percent.

### **Bowling Green MSA**

The Bowling Green MSA is comprised of Warren County, and includes one branch and one full-service ATM. The one branch and ATM is in a middle-income geography. This AA was added to the Kentucky rating area due to the acquisition of Hancock Bank and Trust Company, with the acquisition completed as of November 5, 2021. Examiners completed an analysis of the Bowling Green MSA for 2022 and 2023 only. An analysis of 2021 was not completed since there was less than two months of activity.

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

Table A – Demographic Information of the Assessment Area											
Assessment Area: 2022-2023 Bowling Green MSA											
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #					
Geographies (Census Tracts)	27	3.7	25.9	40.7	25.9	3.7					
Population by Geography	134,554	2.6	23.7	39.2	32.4	2.0					
Housing Units by Geography	54,147	2.9	26.4	40.3	27.5	2.8					
Owner-Occupied Units by Geography	28,754	1.0	15.7	45.3	37.8	0.2					
Occupied Rental Units by Geography	21,126	5.0	39.8	33.6	15.6	6.0					
Vacant Units by Geography	4,267	4.5	32.7	40.7	17.5	4.6					
Businesses by Geography	15,501	4.6	18.5	39.2	33.6	4.1					
Farms by Geography	661	2.3	10.3	53.1	33.0	1.4					
Family Distribution by Income Level	31,053	20.6	15.9	18.8	44.8	0.0					
Household Distribution by Income Level	49,880	23.2	15.5	17.6	43.8	0.0					
Median Family Income MSA - 14540 Bowling Green, KY MSA	\$62,888	Median Housi	ng Value		\$182,031						
			Median Gross	Rent		\$803					
			Families Belo	w Poverty Le	vel	13.1%					

Source: 2020 U.S. Census and 2023 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.

### Demographic Data

As of the 2020 U.S. Census data in the table above, the population of the Bowling Green MSA was 134,554, with 2.6 percent living in low-income CTs, 23.7 percent in moderate-income CTs, 39.2 percent in middle-income CTs, and 32.4 percent in upper-income CTs. Additionally, two percent of the population lived in CTs that had not been assigned an income classification. The AA consisted of 27 CTs with one low-income CT, seven moderate-income CT's, 11 middle-income CTs, seven upper-income CTs, and one CT that had not been assigned an income classification. The AA included 31,053 families and 49,880 households.

## Affordable Housing Cost

Examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the weighted average of the FFIEC updated MSA median family income, low-income families earned less than \$35,100 in 2022 and \$39,350 in 2023. Moderate-income families earned less than \$56,160 in 2022 and \$62,960 in 2023. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payments of no more than 30 percent of the applicant's income based on assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners' insurance, real estate taxes, or any additional monthly expenses. Using these assumptions, a low-income borrower could afford a maximum mortgage payment \$878 per month in 2022 and \$984 in 2023. A moderate-income borrower could afford a maximum mortgage payment of \$1,404 in 2022 and \$1,574 in 2023. According to Realtor.com in 2023, the median home value would result in a monthly payment of \$1,637. This illustrates that low- and moderate-income borrowers would be challenged to qualify for a mortgage loan in the AA.

Examiners considered the poverty level across the AA in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For the Bowling Green MSA, the poverty level was 13.1 percent based on the 2020 U.S. Census data.

Housing availability in the AA posed challenges to lending in low- and moderate-income geographies. As of the 2020 U.S. Census, total occupied rental units in the AA were 39 percent (44.8 percent in low- and moderate-income CTs) of available units. An additional barrier to available units was the volume of vacant units of 7.9 percent (37.2 percent in low- and moderate-income CTs) of total housing units. Owner-occupied units in the AA accounted for 53.1 percent of total housing units, with 16.7 percent in low- and moderate-income CTs.

#### Job Market and Economic Conditions

According to the U.S. Bureau of Labor Statistics, the average annual unemployment rate for the state of Kentucky and the Bowling Green MSA improved from 2021 to 2022 and worsened from 2022 to 2023. The following table summarizes these unemployment rates.

Average Annual Unemployment Rates									
2021 2022 2023									
State of Kentucky	4.5	4.0	4.2						
Bowling Green MSA 4.1 3.8 4.0									
Source: U.S. Bureau of I	Labor Statistics; Rates Not Seas	onally Adjusted.							

According to the April 2024 Moody's Analytics Report, the AA strengths are manufacturing of electric-vehicle parts, exceptionally low cost of living, and the presence of a local university. The leading industries by wage tier include offices of physicians, motor vehicle manufacturing, converted paper product manufacturing, the federal government, and motor vehicle parts manufacturing. The top employers include Houchens Industries, Western Kentucky University, Med Center Health, Dart Container Corp, and General Motors Corp.

## Competition

Investment opportunities are highly competitive. Many community banks tend to purchase mortgage backed securities with home mortgages to low- and moderate-income people or loans in low- and moderate-income geographies, affordable housing multifamily properties, or SBA loan pools in their AAs. CD lending opportunities are available, including opportunities to partner with nonprofit organizations with a CD mission or purpose. There are numerous nonprofits that provide various services to low- and moderate-income people or small businesses, such as affordable housing, financial literacy education, and support for economic development activities.

According to the FDIC Summary of Deposits as of June 30, 2023, FFB had \$26.5 million in deposits in the AA, which comprised 0.7 percent of total bank deposits. Competition was strong with 21 financial institutions operating 54 offices in the AA. The top competitors were Truist Bank with a 17.4 percent market share, American Bank & Trust Company, Inc. with a 16.4 percent market share, and U.S. Bank, N.A. with a 15 percent market share.

#### Community Contacts/Credit Needs

Examiners relied on information provided from one community contact to understand the AA's needs and opportunities. The contact represented an affordable housing organization focused on eliminating poverty, substandard housing, and homelessness. The contact discussed the housing shortage in Warren County, including a need for more affordable housing and critical repairs on older homes. Opportunities for local financial institutions include Community Development Financial Institution (CDFI) investments and homeownership counseling volunteers.

#### KY Non-MSA

The KY Non-MSA is comprised of Calloway, Fulton, Marshall, and Todd counties for the entire evaluation period, with the addition of Breckinridge and Hopkins counties for 2022 and 2023 as discussed above. As of December 31, 2023, there were nine branches and eight ATMs (three full-service) in the KY Non-MSA.

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

Table A – Den	Table A – Demographic Information of the Assessment Area								
Assessment Area: 2021 KY Non-MSA									
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #			
Geographies (Census Tracts)	21	0.0	14.3	57.1	28.6	0.0			
Population by Geography	88,233	0.0	13.6	54.4	32.0	0.0			
Housing Units by Geography	42,787	0.0	15.1	55.7	29.1	0.0			
Owner-Occupied Units by Geography	23,998	0.0	7.3	58.1	34.6	0.0			
Occupied Rental Units by Geography	10,573	0.0	33.6	42.6	23.8	0.0			
Vacant Units by Geography	8,216	0.0	14.1	65.9	20.0	0.0			
Businesses by Geography	6,405	0.0	15.9	51.3	32.9	0.0			
Farms by Geography	638	0.0	8.5	65.4	26.2	0.0			
Family Distribution by Income Level	22,365	16.6	16.2	18.6	48.5	0.0			
Household Distribution by Income Level	34,571	24.0	13.1	16.1	46.8	0.0			
Median Family Income Non-MSAs - KY		\$45,986	Median Housi	ing Value		\$109,486			
			Median Gross	Rent	_	\$588			
			Families Belo	w Poverty Le	vel	11.7%			

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.

Table A – Der	Table A – Demographic Information of the Assessment Area								
Assessment Area: 2022-2023 KY Non-MSA									
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #			
Geographies (Census Tracts)	46	2.2	10.9	43.5	41.3	2.2			
Population by Geography	153,375	1.9	8.9	44.3	44.2	0.6			
Housing Units by Geography	76,163	3.2	9.3	44.0	42.4	1.0			
Owner-Occupied Units by Geography	44,464	0.6	6.4	41.9	50.2	1.0			
Occupied Rental Units by Geography	17,702	8.2	17.1	43.3	31.3	0.1			
Vacant Units by Geography	13,997	5.4	8.9	51.6	31.9	2.2			
Businesses by Geography	13,064	2.2	14.4	40.8	41.8	0.8			
Farms by Geography	1,156	0.7	8.6	39.0	51.5	0.3			
Family Distribution by Income Level	40,367	17.8	15.2	19.4	47.6	0.0			
Household Distribution by Income Level	62,166	23.0	14.5	16.0	46.5	0.0			
Median Family Income Non-MSAs - KY		\$54,327	Median Housi		\$120,170				
			Median Gross	Rent		\$688			
			Families Belo	w Poverty Le	vel	12.2%			

Source: 2020 U.S. Census and 2023 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.

## Demographic Data

As of the 2020 U.S. Census data in the table above, the population of the KY Non-MSA was 153,375, with 1.9 percent living in low-income CTs, 8.9 percent in moderate-income CTs, 44.3 percent in middle-income CTs, and 44.2 percent in upper-income CTs. Additionally, 0.6 percent of the population lived in CTs that had not been assigned an income classification. The AA consisted of 46 CTs with one low-income CT, five moderate-income CT's, 20 middle-income CTs, 19 upper-income CTs, and one CT that had not been assigned an income classification. The AA included 40,367 families and 62,166 households. The primary changes in demographics are due to the addition of Breckinridge and Hopkins counties to the KY Non-MSA.

#### Affordable Housing Cost

Examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the weighted average of the FFIEC updated MSA median family income, low-income families earned less than \$26,300 in 2021, \$30,850 in 2022, and \$32,450 in 2023. Moderate-income families earned less than \$42,080 in 2021, \$49,360 in 2022, and \$51,920 in 2023. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payments of no more than 30 percent of the applicant's income based on assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners' insurance, real estate taxes, or any additional monthly expenses. Using these assumptions, a low-income borrower could afford a maximum mortgage payment \$658 per month in 2021, \$771 per month in 2022, and \$811 in 2023. A moderate-income borrower could afford a maximum mortgage payment of \$1,052 per month in 2021, \$1,234 in 2022, and \$1,298 in 2023. According to Realtor.com in 2023, the average median home value for the six counties in the KY Non-MSA would result in a monthly payment of approximately \$1,337, which would not be affordable for low- and moderate-income borrowers.

Examiners considered the poverty level across the AA in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For the KY Non-MSA, the poverty level was 11.7 percent according to the 2015 ACS and increased to 12.2 percent based on the 2020 U.S. Census data. The addition of Breckinridge and Hopkins may have impacted the poverty level.

Housing availability in the AA posed challenges to lending in low- and moderate-income geographies. As of the 2020 U.S. Census, total occupied rental units in the AA were 23.2 percent (25.3 percent in low- and moderate-income CTs) of available units. An additional barrier to available units was the volume of vacant units of 18.4 percent (14.3 percent in low- and moderate-income CTs) of total housing units.

#### Job Market and Economic Conditions

According to the U.S. Bureau of Labor Statistics, the average annual unemployment rate for the state of Kentucky and the counties listed below in the table improved from 2021 to 2022 and worsened from 2022 to 2023 for four of the six counties. The following table summarizes these unemployment rates. Top employers in the KY Non-MSA include Murray State University, Walmart Distribution Center, Ashland, Inc., Briggs Stratton, and Murray/Calloway Community Hospital.

	Average Annual Unemployment Rates									
	2021	2022	2023							
State of Kentucky	4.5	4.0	4.2							
Breckinridge County	5.0	4.7	4.9							
Calloway County	4.3	4.1	4.4							
Fulton County	5.0	4.6	5.0							
Hopkins County	4.9	4.5	4.4							
Marshall County	4.5	4.2	4.0							
Todd County	3.5	3.3	3.8							
Source: U.S. Bureau of	Labor Statistics; Rates Not S	easonally Adjusted.								

## **Competition**

According to the FDIC Summary of Deposits as of June 30, 2023, FFB had \$354.6 million in deposits in the AA, which comprised 8.6 percent of total bank deposits. Competition was strong with 22 financial institutions operating 60 offices in the AA. The top two competitors were Community Financial Services Bank with a 21.8 percent market share and The Murray Bank with a 10.2 percent market share. FFB was ranked third in deposit market share.

#### Community Contacts/Credit Needs

Examiners reviewed one community contact with an economic development organization. According to the contact, development of affordable housing is a need given the significant increases in the cost of materials. There is also a need for SBA 504 and micro loan lending.

## Scope of Evaluation in Kentucky

Examiners selected the Bowling Green MSA and KY Non-MSA for full-scope reviews. The Bowling Green MSA was a new AA since the previous CRA evaluation. The KY Non-MSA has the majority of deposit and lending activity in the Kentucky rating area and received the most weight in the analysis. The Owensboro MSA received a limited-scope review. Refer to the table in Appendix A for more information.

FFB did not originate a sufficient volume of any loan product to conduct meaningful analyses in the Owensboro MSA. Within the Bowling Green and KY Non-MSA AAs, home mortgage and small business loans received relatively equal weight, while small loans to farms received less weight in the KY Non-MSA or were not considered due to an insufficient volume of loans for a meaningful analysis in the Bowling Green MSA.

#### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KENTUCKY

#### LENDING TEST

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

## Conclusions for Area Receiving a Full-Scope Review

Based on full-scope reviews, the bank's performance in the Bowling Green MSA is good and performance in the KY Non-MSA is adequate.

## **Lending Activity**

Lending levels reflect excellent responsiveness to AA credit needs.

	Number of Loans*										
Assessment	Home	Small	Small	Community		%State	%State				
Area	Mortgage	Business	Farm	Development	Total	Loans	Deposits				
Bowling	50	54	3	4	111	19.4	5.7				
Green MSA											
KY Non-	215	157	66	1	439	76.8	75.5				
MSA											
Owensboro	17	2	3	0	22	3.8	18.8				
MSA											
Total	282	213	72	5	572	100.0	100.0				

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

		D	ollar Volum	e of Loans*			
Assessment	Home	Small	Small	Community		%State*	%State
Area	Mortgage	Business	Farm	Development	Total	Loans	Deposits
Bowling	11,992	7,167	88	4,964	24,211	35.2	5.7
Green MSA							
KY Non-	19,534	15,610	8,232	100	43,476	63.3	75.5
MSA							
Owensboro	953	30	56	0	1,039	1.5	18.8
MSA							
Total	32,479	22,807	8,376	5,064	68,726	100.0	100.0

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

#### Bowling Green MSA

Lending levels reflect good responsiveness to AA credit needs.

According to the FDIC Summary of Deposits as of June 30, 2023, FFB had \$26.5 million in deposits in the AA. This represented 0.7 percent of the deposit market share, ranking 17<sup>th</sup> out 21 financial institutions, placing it in the top 81 percent of deposit-taking institutions.

According to 2022 Peer Mortgage data, FFB held a 0.8 percent market share of home mortgage originations, by number of loans, ranking 35<sup>th</sup> among 237 lenders (top 15 percent of all lenders). The top three lenders were Atlantic Bay Mortgage Group with 8.1 percent market share, South Central Bank Inc. with six percent market share, and U.S. Bank, N.A. with 5.5 percent market share.

Based on the 2022 Peer Small Business loan data, FFB held a 0.03 percent market share of small loans to businesses, by number of loans, ranking 82<sup>nd</sup> out of 89 lenders (top 92 percent of all lenders). The top three lenders were American Express National Bank with 15.6 percent market share, U.S. Bank, N.A. with 13.3 percent market share, and JPMorgan Chase Bank, N.A. with 12.7 percent market share.

#### KY Non-MSA

Lending levels reflect excellent responsiveness to AA credit needs.

According to the FDIC Summary of Deposits as of June 30, 2023, FFB had \$354.6 million in deposits in the AA. This represented 8.8 percent of the deposit market share, ranking third out 22 financial institutions, placing it in the top 14 percent of deposit-taking institutions.

According to 2022 Peer Mortgage data, FFB held a three percent market share of home mortgage originations, by number of loans, ranking seventh among 254 lenders (top three percent of all lenders). The top three lenders were U.S. Bank with 5.9 percent of the market share, Rocket Mortgage with 5.6 percent of the market share, and Independence Bank of Kentucky with 5.5 percent of the market share.

Based on the 2022 Peer Small Business loan data, FFB held a one percent market share of small loans to businesses, by number of loans, ranking 13 out of 75 lenders (top 17 percent of all lenders). The top three lenders were American Express National Bank with 20.1 percent of the market share, Synchrony Bank with 16.3 percent of the market share, and JPMorgan Chase Bank, N.A, with 12.1 percent of the market share.

## Distribution of Loans by Income Level of the Geography

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

## Home Mortgage Loans

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.

#### **Bowling Green MSA**

The geographic distribution of home mortgage loans was excellent.

2022 - 2023

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

#### KY Non-MSA

The geographic distribution of home mortgage loans was adequate.

2021

The percentage of home mortgage loans in moderate-income geographies was significantly below both percentage of owner-occupied housing units and the aggregate percentage of all reporting lenders. There were no low-income geographies in the AA.

#### 2022 - 2023

FFB did not originate any home mortgage loans in low-income geographies. Examiners considered the low volume (0.6 percent) of owner-occupied housing units and the limited percentage (0.4 percent) of reporting lenders originating loans in low-income geographies (aggregate data), which limits the bank's lending opportunities. The percentage of home mortgage loans in moderate-income geographies exceeded both the percentage of owner-occupied housing units and the aggregate percentage of all reporting lenders.

#### Small Loans to Businesses

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.

## **Bowling Green MSA**

The geographic distribution of small loans to businesses was good. Examiners placed more weight on performance in moderate-income geographies due to the limited number of small businesses operating in low-income geographies.

2022 - 2023

The percentage of small loans to businesses in low-income geographies was significantly below the percentage of businesses located in those geographies and well below the aggregate percentage of all reporting lenders. The percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

#### KY Non-MSA

The geographic distribution of small loans to businesses was adequate. Examiners placed more weight on performance in moderate-income geographies due to the limited number of small businesses operating in low-income geographies.

2021

The percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

2022 - 2023

FFB did not originate any small loans to businesses in low-income geographies. Examiners considered the low volume (2.2 percent) of businesses in low-income geographies and the limited percentage (2.3 percent) of reporting lenders originating loans in low-income geographies (aggregate data), which limits the bank's lending opportunities. The percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

#### Small Loans to Farms

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.

#### **Bowling Green MSA**

FFB did not originate enough small loans to farms in the Bowling Green MSA to conduct a meaningful analysis.

#### KY Non-MSA

The geographic distribution of small loans to farms was adequate.

2021

The percentage of small loans to farms in moderate-income geographies was below the percentage of farms located in those geographies and significantly below the aggregate percentage of all reporting lenders.

2022 - 2023

FFB did not originate any small loans to farms in low-income geographies. Examiners considered the low volume (0.7 percent) of farms in low-income geographies and the limited percentage (0.0 percent) of reporting lenders originating loans in low-income geographies (aggregate data), which limits the bank's lending opportunities. The percentage of small loans to farms in moderate-income geographies exceeded both the percentage of farms located in those geographies and the aggregate percentage of all reporting lenders.

#### Lending Gap Analysis

Examiners analyzed geographic lending patterns of home mortgage loans, small loans to businesses, and small loans to farms by reviewing maps of loan originations and purchases throughout the AA. Examiners did not identify any conspicuous or unexplained gaps in lending.

#### Distribution of Loans by Income Level of the Borrower

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

#### Home Mortgage Loans

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.

#### Bowling Green MSA

The distribution of home mortgage loans to individuals of different income levels was poor.

#### 2022 - 2023

The percentage of home mortgage loans to low-income borrowers was significantly below both the percentage of families and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers was significantly below both the percentage of families and the aggregate percentage of all reporting lenders.

#### KY Non-MSA

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

2021

The percentage of home mortgage loans to low-income borrowers was significantly below the percentage of families and exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of families and the aggregate percentage of all reporting lenders.

2022 - 2023

The percentage of home mortgage loans to low-income borrowers was significantly below the percentage of families and exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of families and the aggregate percentage of all reporting lenders.

#### Small Loans to Businesses

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.

#### **Bowling Green MSA**

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

2022 - 2023

The percentage of small loans to businesses with gross annual revenues of \$1 million or less was well below the percentage of businesses with revenues of \$1 million or less and near to the aggregate percentage of all reporting lenders.

#### KY Non-MSA

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

2021

This analysis included 88 PPP loans totaling \$3.2 million that helped support small businesses during the COVID-19 pandemic. The percentage of small loans to businesses with gross annual revenues of \$1

million or less was significantly below both the percentage of businesses with revenues of \$1 million or less and the aggregate percentage of all reporting lenders.

Examiners considered the impact of the high percentage of small loans to businesses with revenue information not available on the borrower distribution analysis. For 68.8 percent of small loans to businesses in the KY Non-MSA, borrower revenue information was not available. The majority of the loans with unknown revenues were PPP loans which did not require the bank to collect or consider gross annual revenues.

2022 - 2023

The percentage of small loans to businesses with gross annual revenues of \$1 million or less was below the percentage of businesses with revenues of \$1 million or less and exceeded the aggregate percentage of all reporting lenders.

#### Small Loans to Farms

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.

#### **Bowling Green MSA**

FFB did not originate enough small loans to farms in the Bowling Green MSA to conduct a meaningful analysis.

#### KY Non-MSA

The distribution of small loans to farms of different sizes was adequate.

2021

The percentage of small loans to farms with gross annual revenues of \$1 million or less was below the percentage of farms with revenues of \$1 million or less and exceeded the aggregate percentage of all reporting lenders.

2022 - 2023

The percentage of small loans to farms with gross annual revenues of \$1 million or less was below the percentage of farms with revenues of \$1 million or less and exceeded the aggregate percentage of all reporting lenders.

#### **Community Development Lending**

The institution has made a relatively high level of CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

## **Bowling Green MSA**

The institution is a leader in making CD loans. FFB made four loans totaling almost \$5 million. This total included three loans totaling \$400,00 to a non-profit organization that provides affordable housing to low- and moderate-income individuals. FFB also made one \$4.6 million loan that supported a 50-unit low-income housing apartment complex subsidized by the federal government.

#### KY Non-MSA

The institution has made a low level of CD loans. FFB originated one CD loan totaling \$100,000. The loan was made to a community action agency that provides CD services to low- and moderate-income individuals and was located in a moderate-income geography.

#### **Product Innovation and Flexibility**

The institution makes little use of innovative and/or flexible lending practices in order to serve AA credit needs.

### **Bowling Green MSA**

The institution makes little use of innovative and/or flexible lending practices in order to serve AA credit needs. In July 2022, FFB was approved to participate in the Kentucky Collateral Support Program, which provides a pledged asset to an enrolled lender of up to 20 percent in order to enhance the lenders collateral coverage. In 2022, FFB originated a loan for \$192,600 in the program to a business that provides health care services, including Medicare and Medicaid recipients in which the majority of its revenue is derived.

#### KY Non-MSA

The institution makes little use of innovative and/or flexible lending practices in order to serve AA credit needs. During the evaluation period, FFB made three FHA loans totaling \$445,150 among the various flexible mortgage lending products available in the AA. The bank also made 88 PPP loans totaling \$3.2 million during 2021.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on a limited-scope review, the bank's performance under the Lending Test in the Owensboro MSA is weaker than the bank's overall performance under the Lending Test. There were not enough loans for a meaningful analysis in this AA. FFB has two branches in the Owensboro MSA, which were added to the bank's AAs during the November 2021 acquisition. The performance in the Owensboro MSA did not impact the bank's overall performance under the Lending Test.

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

#### INVESTMENT TEST

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

## **Conclusions for Area Receiving Full-Scope Reviews**

Based on full-scope reviews, the bank's performance in the Bowling Green MSA is excellent and performance in the KY Non-MSA is good. Statewide and regional investments provide additional support for the overall outstanding Investment Test rating for the state of Kentucky.

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

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

	Qualified Investments											
	Pri	Prior Period* Current Peri			Total					Unfunded		
Assessment Area				_					Co	mmitments**		
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of	#	\$(000's)		
								Total \$				
Bowling Green	0	0	10	9,528	10	25.6	9,528	38.9	0	0		
MSA												
KY Non-MSA	2	442	8	1,497	10	25.6	1,939	7.9	0	0		
Owensboro MSA	1	1,036	3	5	4	10.3	1,041	4.3	0	0		
Statewide/Regional	7	6,440	8	5,538	15	38.5	11,978	48.9	0	0		
Area												
Total	10	7,918	29	16,568	39	100.0	24,486	100.0	0	0		

<sup>\*</sup> Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

## **Bowling Green MSA**

During the evaluation period, FFB made 10 investments and donations totaling \$9.5 million. This represented 282.9 percent of allocated tier 1 capital. The majority of the investments was a \$7.5 million investment in a low-income housing apartment complex subsidized by the federal government. FFB also invested in affordable housing with Freddie Mac and a \$1 million bond issuance for an industrial park located in a moderate-income CT.

#### KY Non-MSA

During the evaluation period, FFB made 10 investments and donations totaling \$1.9 million. This represented 4.3 percent of allocated tier 1 capital. Examples include a \$390,845 investment to a local school district for improvements with a majority of the students receiving free lunch and a \$135,200 investment in affordable housing loans through Freddie Mac.

#### Statewide/Regional Area

Because the bank was responsive to CD needs and opportunities in the full-scope areas, broader statewide and regional investments that do not have a purpose, mandate, or function to serve the AAs received consideration in the evaluation period. During the evaluation period, FFB held 15 investments totaling \$12 million, which represented 20.1 percent of allocated tier 1 capital for the state of Kentucky. These investments provide additional support for the Outstanding Investment Test rating in the state of Kentucky.

<sup>\*\*</sup> Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on a limited-scope review, the bank's performance under the Investment Test in the Owensboro 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 Kentucky is rated Outstanding.

## **Conclusions for Area Receiving a Full-Scope Review**

Based on full-scope reviews, the bank's performance in the Bowling Green MSA is good and performance in the KY Non-MSA 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	# of BANK Branches	BANK Rated Income of Geographies (%)*				% of	Populati	llation on within aphy**	Each	
	AA	2101101101	Branches in AA	Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Bowling Green MSA	5.7	1	8.3	0.0	0.0	100.0	0.0	2.6	23.7	39.2	32.4
KY Non- MSA	75.5	9	75.0	0.0	44.4	33.3	22.2	1.9	8.9	44.3	44.2
Owensboro MSA	18.8	2	16.7	0.0	0.0	100.0	0.0	0.0	0.0	100.0	0.0

#### **Bowling Green MSA**

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

The bank does not have any branches in low- or moderate-income geographies; however, the bank only has one branch in the AA. The branch is located near to low- and moderate-income geographies. FFB complements its branches with ATMs, internet banking, mobile banking, banking by telephone, and banking by mail.

FFB offered ADS including ATMs, Call Center, and digital banking (online/mobile). These systems provided additional delivery availability and access to banking services to both retail and business customers. FFB had one full-service ATM in the AA located in a middle-income geography.

#### KY Non-MSA

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

The bank has four branches in moderate-income geographies, which exceeds the population in those geographies. FFB complements its branches with ATMs, internet banking, mobile banking, banking by telephone, and banking by mail.

FFB offered ADS including ATMs, Call Center, and digital banking (online/mobile). These systems provided additional delivery availability and access to banking services to both retail and business customers. FFB had an ATM at all branches except one that is in a moderate-income geography. However, there is another ATM located in a different branch in the same city, which is also in a moderate-income geography.

	Distribution of Branch Openings/Closings									
	Branch Openings/Closings									
Assessment Area	# of Branch Openings	# of Branch Closings								
			Low	Mod	Mid	Upp				
Bowling Green MSA	0	1	0	0	-1	0				
KY Non-MSA	0	1	0	-1	0	0				
Owensboro MSA	0	0	0	0	0	0				

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

#### **Bowling Green MSA**

The bank closed one branch during the evaluation period. The bank closed one branch in Warren County in a middle-income CT due to declining customer usage.

Services, including where appropriate, business hours, do not vary in a way that inconveniences, its AAs, particularly low- and moderate-income geographies and/or individuals. FFB maintained standard business hours at its branch location in the AA with extended hours offered on Fridays. The branch does not offer Saturday hours but had drive-up facilities and night deposit services.

#### KY Non-MSA

The bank closed one branch in a moderate-income geography during the evaluation period due to slow growth and production and declining customer usage. This was due in part to the branch's location and close proximity to another branch in Murray, Kentucky.

Services, including where appropriate, business hours, do not vary in a way that inconveniences, its AAs, particularly low- and moderate-income geographies and/or individuals. FFB maintained standard business hours at its branch locations in the AA with extended hours offered on Fridays. Several branches offer Saturday hours, with drive-up facilities and night deposit services.

## **Community Development Services**

The institution is a leader in CD services.

## **Bowling Green MSA**

The institution is a leader in providing CD services. During the evaluation period, two employees provided services to two different organizations. In total, employees donated 96 hours of CD services to organizations providing CD services to low- and moderate-income individuals.

#### KY Non-MSA

The institution is a leader in providing CD services. During the evaluation period, five employees provided services to seven different organizations. In total, employees donated 1,179 hours of CD services to organizations providing CD services to low- and moderate-income individuals and for economic development, revitalization, and stabilization. All employees provided leadership to these organizations by serving on the board, as president or vice president, or on finance committees.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on a limited-scope review, the bank's performance under the Service Test in Owensboro MSA is consistent with the bank's overall performance under the Service Test in the full-scope area.

#### **State of Tennessee**

CRA rating for the State of Tennessee: 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 activity levels reflect good responsiveness to AA credit needs.
- The bank exhibits an adequate geographic distribution of loans. The distribution of loans among borrowers of different income levels and businesses of different sizes is adequate.
- FFB did not originate any CD loans in the AAs.
- FFB had an overall excellent level of qualified CD investments, considering the statewide and regional investments.
- Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the AAs.

## **Description of Institution's Operations in Tennessee**

FFB delineated two AAs in the state of Tennessee. The AAs include Cheatham County in the Nashville MSA and Houston County in the TN Non-MSA. FFB closed its only branch in Houston County (TN Non-MSA) on January 31, 2023, due to declining customer usage and branch location in a low traffic area in a rural county. Refer to appendix A for a complete list of counties included in each AA.

During the evaluation period, the bank made \$11.3 million in home mortgage loans, small loans to businesses, and small loans to farms in the Tennessee AAs, which represented 1.3 percent of total originations inside all AAs. By number of loans, FFB made 121 home mortgage, small loans to businesses, and small loans to farms inside the Tennessee AAs, which represents 1.5 percent of the total originations in all AAs. The state of Tennessee represented the lowest lending and deposit volumes of all the rating areas.

#### Nashville MSA

The Nashville MSA consisted of Cheatham County, one of 14 counties in the Nashville MSA. FFB operated three branches and three ATMs (one full-service ATM) in middle-income CTs within the AA. There were no low- or upper-income CTs in the AA during either analysis period.

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

Table A – Demographic Information of the Assessment Area								
Ass	sessment Ar	ea: 2021 Na	shville MSA					
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #		
Geographies (Census Tracts)	9	0.0	44.4	55.6	0.0	0.0		
Population by Geography	39,422	0.0	41.2	58.8	0.0	0.0		
Housing Units by Geography	15,797	0.0	42.6	57.4	0.0	0.0		
Owner-Occupied Units by Geography	11,513	0.0	41.3	58.7	0.0	0.0		
Occupied Rental Units by Geography	2,986	0.0	43.3	56.7	0.0	0.0		
Vacant Units by Geography	1,298	0.0	53.2	46.8	0.0	0.0		
Businesses by Geography	2,802	0.0	39.3	60.7	0.0	0.0		
Farms by Geography	150	0.0	40.7	59.3	0.0	0.0		
Family Distribution by Income Level	10,561	23.3	19.3	21.9	35.6	0.0		
Household Distribution by Income Level	14,499	22.4	18.2	19.8	39.7	0.0		
Median Family Income MSA - 34980 Nashville-DavidsonMurfreesboro Franklin, TN MSA		\$66,441	Median Housi	ng Value		\$158,206		
	•		Median Gross	Rent		\$942		
			Families Belo	w Poverty Lev	vel	10.6%		

Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0%

<sup>(\*)</sup> The NA category consists of geographies that have not been assigned an income classification.

Table A – Den	nographic I	nformation	of the Assessn	nent Area					
Assessment Area: 2022-2023 Nashville MSA									
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #			
Geographies (Census Tracts)	9	0.0	22.2	77.8	0.0	0.0			
Population by Geography	41,072	0.0	28.0	72.0	0.0	0.0			
Housing Units by Geography	16,459	0.0	28.8	71.2	0.0	0.0			
Owner-Occupied Units by Geography	11,863	0.0	28.5	71.5	0.0	0.0			
Occupied Rental Units by Geography	3,454	0.0	31.8	68.2	0.0	0.0			
Vacant Units by Geography	1,142	0.0	23.5	76.5	0.0	0.0			
Businesses by Geography	3,720	0.0	22.6	77.4	0.0	0.0			
Farms by Geography	204	0.0	19.1	80.9	0.0	0.0			
Family Distribution by Income Level	11,215	23.1	19.7	28.1	29.1	0.0			
Household Distribution by Income Level	15,317	23.5	17.7	21.5	37.3	0.0			
Median Family Income MSA - 34980 Nashville-DavidsonMurfreesboro Franklin, TN MSA		\$83,085	Median Housi	ng Value		\$199,227			
	•		Median Gross	Rent		\$1,010			
			Families Belo	w Poverty Lev	vel	7.3%			

Source: 2020 U.S. Census and 2023 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.

#### Demographic Data

As of the 2020 U.S. Census data in the table above, the population of the Nashville MSA AA was 41,072, with 28 percent living in moderate-income CTs and 72 percent in middle-income CTs. The AA consisted of nine CTs with two moderate-income CTs and seven middle-income CTs. The AA included 11,215 families and 15,317 households. The major changes since the 2015 ACS include changes in population living in moderate-income CTs due to two CTs moving to middle-income from moderate-income.

## Affordable Housing Cost

Examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the weighted average of the FFIEC updated MSA median family income, low-income families earned less than \$39,600 in 2021, \$47,800 in 2022, and \$50,250 in 2023, and moderate-income families earned less than \$63,360 in 2021, \$76,480 in 2022, and \$80,400 in 2023. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payments of no more than 30 percent of the applicant's income based on 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. Using these assumptions, a low-income borrower could afford a maximum mortgage payment of \$990 per month in 2021, \$1,195 in 2022, and \$1,256 in 2023. A moderate-income borrower could afford a maximum payment of \$1,584 per month in 2021, \$1,912 in 2022, and \$2,010 in 2023. According to Realtor.com in 2023, the median home value would result in a monthly payment of \$3,001. This illustrates that both low- and moderate-income borrowers would be challenged to qualify for a mortgage loan in the AA.

Examiners considered the poverty level across the AA in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For the Nashville MSA, the poverty level according to the 2015 ACS was 10.6 percent and declined to 7.3 percent based on the 2020 U.S. Census data.

Housing availability in the AA posed a moderate challenge to lending in low- and moderate-income geographies. As of the 2020 U.S. Census, total rental units in the AA were 21 percent (31.8 percent in moderate-income CTs) of available units. An additional barrier to available units was the volume of vacant units of 6.9 percent (23.5 percent in moderate-income CTs) of total housing units. Owner-occupied units in the AA accounted for 72.1 percent of total housing units, with 28.5 percent in moderate-income tracts.

#### Job Market and Economic Conditions

According to the U.S. Bureau of Labor Statistics, the average annual unemployment rate for the state of Tennessee and the Nashville MSA improved from 2021 to 2023, with the Nashville MSA unemployment rates better than the state of Tennessee. The following table summarizes these unemployment rates.

Average Annual Unemployment Rates									
2021 2022 2023									
State of Tennessee	4.5	3.4	3.3						
Nashville MSA	Nashville MSA 3.8 2.7 2.7								
Source: U.S. Bureau of Labor St	atistics; Rates Not Season	ally Adjusted.							

According to the Moody's Analytics Report as of April 2024, the strengthens of the Nashville MSA included a favorable business tax structure, strong demographics, and a large concentration of prime-age workers. Leading industries by wage tier included management of companies and enterprises, office of physicians, management, scientific, and technical consulting services, and agencies, brokerages, and other insurance related accounts. Large employers included Vanderbilt University Medical Center, Nissan North America Inc., and HCA Inc.

#### **Competition**

Investment opportunities are highly competitive. Many community banks tend to purchase mortgage backed securities with home mortgages to low- and moderate-income people or loans in low- and moderate-income geographies, affordable housing multifamily properties, or SBA loan pools in their AAs. CD lending opportunities are available, including opportunities to partner with nonprofit organizations with a CD mission or purpose. There are numerous nonprofits that provide various services to low- and moderate-income people or small businesses, such as affordable housing, financial literacy education, and support for economic development activities.

According to the FDIC Deposit Market Share Data as of June 30, 2023, FFB has \$125.6 million in deposits, which comprised 3.1 percent of total deposits. The top three competitors include Pinnacle Bank with one branch and 35 percent market share, United Community Bank with three branches and 27.1 percent market share, and U.S. Bank, N.A. with two branches and 18.1 percent market share.

#### Community Contacts/Credit Needs

Examiners reviewed information provided from one community contact to understand the AA's needs and opportunities. According to the community contact, the most significant concern was the lack of affordable housing for both purchasing and renting. The cost of rent has dramatically increased over the last few years, pushing renters into suburbs and rural areas. Along with the rising cost, there has been a significant concern with predatory lending to low- and moderate-income individuals. There are opportunities for lenders to compete with payday lenders. Employee retention has been impacted by increases in mental health issues. There is a need for financial literacy, with opportunities for financial education.

## **Scope of Evaluation in Tennessee**

Examiners selected the Nashville MSA for a full-scope review. The TN Non-MSA received a limited-scope review, as the bank closed the only office in this AA in January 2023. Refer to the table in Appendix A for more information. Based on the number of loan originations inside the Tennessee rating area, 76 percent were in the Nashville MSA and 24 percent were in the TN Non-MSA during the evaluation period. Since FFB's only branch in the TN Non-MSA was closed in January 2023, 100 percent of the state's deposits as of June 30, 2023, was in the Nashville MSA.

There were no low-income geographies in the Nashville MSA. Geographic conclusions are based solely on performance in moderate-income geographies. The bank did not originate or purchase a sufficient volume of small loans to businesses or small loans to farms to conduct a meaningful analysis in the Nashville MSA. Conclusions are based solely on home mortgage lending performance.

The bank did not originate or purchase a sufficient volume of any loan product in the TN Non-MSA to conduct a meaningful analysis. Performance is based solely on CD lending.

#### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TENNESSEE

#### LENDING TEST

The bank's performance under the Lending Test in Tennessee is rated Low Satisfactory.

## Conclusions for Area Receiving a Full-Scope Review

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

## **Lending Activity**

Lending levels reflect good responsiveness to AA credit needs.

	Number of Loans*														
	Home Small Small Community %State														
Assessment Area	Mortgage	e Business Farm Development				Loans	Deposits								
Nashville MSA	72	19	1	0	92	75.4	100.0								
TN Non-MSA	15	14	0	0	29	23.8	0.0								
Statewide/Regional	0	0	0	1	1	0.8	-								
Area															
Total	87	33	1	1	122	100.0	100.0								

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

	Dollar Volume of Loans*														
	Home Small Small Community %State* %														
Assessment Area	Mortgage	Business	Farm	Development	Total	Loans	Deposits								
Nashville MSA	8,340	668	5	0	9,013	24.8	100.0								
TN Non-MSA	2,150	140	0	0	2,290	6.3	0.0								
Statewide/Regional	0	0	0	25,000	25,000	68.9	-								
Area															
Total	10,490	808	5	25,000	36,303	100.0	100.0								

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

#### Nashville MSA

According to the FDIC Deposit Market Share Data as of June 30, 2023, FFB had \$125.6 million in deposits, ranking fourth out of five (top 80 percent of all lenders) depository institutions with a deposit market share of 16.9 percent. The top three competitors include Pinnacle Bank with one branch and 35 percent market share, United Community Bank with three branches and 27.1 percent market share, and U.S. Bank, N.A. with two branches and 18.1 percent market share.

Based on the 2022 Peer Mortgage market share data, FFB ranked 21<sup>st</sup> out of 236 lenders (top nine percent of all lenders) with a market share of 1.5 percent for home mortgage loans. The top three lenders included Rocket Mortgage with a market share of 4.3 percent, Pinnacle Bank with a market share of 4.3 percent, and United Wholesale Mortgage with a market share of 4.0 percent.

#### Distribution of Loans by Income Level of the Geography

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

#### Home Mortgage Loans

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

The overall geographic distribution of home mortgage loans is good.

#### Nashville MSA

2021

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

2022 - 2023

The percentage of home mortgage loans in moderate-income was below the percentage of owner-occupied housing unit located in those geographies and near to the aggregate percentage of all reporting lenders.

#### Small Loans to Businesses

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

FFB did not originate a sufficient volume of small loans to businesses in either analysis period to conduct a meaningful analysis.

#### Small Loans to Farms

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

FFB did not originate a sufficient volume of small loans to farms in either analysis period to conduct a meaningful analysis.

#### Lending Gap Analysis

Examiners analyzed geographic lending patterns of home mortgage loans by reviewing maps of loan originations and purchases throughout the AA. Examiners did not identify any conspicuous or unexplained gaps in lending.

## Distribution of Loans by Income Level of the Borrower

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

#### Home Mortgage Loans

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

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

#### 2021

The percentage of home mortgage loans to low-income borrowers was well below the percentage of those families and exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of families and the aggregate percentage of all reporting lenders.

2022 - 2023

The percentage of home mortgage loans to low-income borrowers was well below the percentage of those families but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of families and aggregate percentage of all reporting lenders.

#### Small Loans to Businesses

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

FFB did not originate a sufficient volume of small loans to businesses to conduct a meaningful analysis during either analysis period.

#### Small Loans to Farms

Refer to Table T in the state of Tennessee 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.

FFB did not originate a sufficient volume of small loans to farms to conduct a meaningful analysis during either analysis period.

## **Community Development Lending**

The institution has made few, if any, CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

#### Nashville MSA

During the evaluation period, FFB did not make any CD loans in the Nashville MSA.

#### Statewide/Regional

During the evaluation period, FFB originated one CD loan totaling \$25 million in Knoxville, TN. The purpose of this loan was to construct a 206-unit student housing apartment building. The building will be located in a low-income community opportunity zone. The statewide CD loan had a neutral impact on the Lending Test given that FFB did not make any CD loans in the Nashville MSA during the evaluation period.

## **Product Innovation and Flexibility**

FFB makes little use of innovative and/or flexible lending practices in order to serve AA credit needs. Refer to the Other Information section under the Scope of the Evaluation for additional details on other flexible lending products.

During the evaluation period, FFB made two loans totaling \$675,115 among the various flexible mortgage lending products available in the Nashville MSA. This included one FHA loans totaling \$240,562 and one VA loan totaling \$434,553. The bank also made 15 SBA PPP loans totaling \$325,000 during 2021.

## **Conclusions for Area Receiving a Limited-Scope Review**

Based on a limited-scope review, the bank's performance under the Lending Test in the TN Non-MSA is weaker than the bank's overall performance under the Lending Test in the full-scope area. FFB did not originate enough loans in the TN Non-MSA for a meaningful analysis. The performance in the TN Non-MSA did not impact the overall rating.

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

#### INVESTMENT TEST

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

## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Nashville MSA is good. The statewide and regional investments totaled 72.2 percent of allocated tier 1 capital providing support for the Investment Test rating of Outstanding.

The institution has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

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

	Qualified Investments														
	Prio	or Period*	Curi	ent Period		,		Unfunded							
Assessment Area								Commitments**							
	#	\$(000's)	#	\$(000's)	#	% of Total	\$(000's)	% of	#	\$(000's)					
						#		Total \$							
Nashville MSA	1	124	5	763	6	54.5	887	7.2	0	0					
TN Non-MSA	0	0	0	0	0	0.0	0	0.0	0	0					
Statewide/Region	0	0	5	11,515	5	45.5	11,515	92.8	0	0					
al Area															
Total	1	124	10	12,278	11	100.0	12,402	100.0	0	0					

<sup>\*</sup> Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

<sup>\*\*</sup> Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

During the evaluation period, FFB made five qualifying grants and donations to two organizations totaling \$763,000. The bank provided \$762,049 in investments through Freddie Mac supporting lowand moderate individuals and affordable housing needs in the area. In addition to this, FFB has donated \$500 to an organization that offers food and supplies to individuals in need. The dollar volume of current- and prior-period investments represented 5.6 percent of tier 1 capital allocated to the AA.

#### Statewide/Regional Area

Because the bank was responsive to CD needs and opportunities in the full-scope area, broader statewide and regional investments that do and do not have a purpose, mandate, or function to serve the AAs received consideration in the assessment. FFB purchased three investments totaling \$10.1 million in Davidson County which borders the Nashville MSA. Two of the investments were focused on providing affordable housing for low- to moderate-income individuals. The third investment was focused on providing short term potential funding for COVID-19. FFB also purchased two investments in other counties in Tennessee that do not border the Nashville MSA. One investment totaled \$1.4 million and was made to provide funds to build county schools primarily located in low- to moderate-income tracts. The second donation of \$500 supported programs that provide community services to low- to moderate income families. Total statewide Tennessee investments represented 72.2 percent of allocated tier 1 capital for the state of Tennessee. Statewide and regional investments had a positive impact on the Investment Test and provides additional support for an overall outstanding rating.

## Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the TN Non-MSA is weaker than the bank's overall performance under the Investment Test in the full-scope area. There were no qualified investments in the TN Non-MSA during the evaluation period. The bank's performance in the TN Non-MSA did not have an impact on the overall performance.

#### SERVICE TEST

The bank's performance under the Service Test in Tennessee is rated Low Satisfactory.

#### **Conclusions for Area Receiving a Full-Scope Review**

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

## **Retail Banking Services**

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

	D:											
Assessment	Deposits				Population							
Area	% of Rated	# of Bank	% of Rated	Loca		Branches ographie		% of Population within Each Geography				
	Area Deposits in AA	Branches	Area Branches	Low	Mod	Mid	Upp	N/A	Low	Mod	Mid	Upp
Nashville MSA	100.0	3	100.0	0.0	0.0	100.0	0.0	0.0	0.0	28.0	72.0	0.0
TN Non- MSA AA	0.0	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	75.0	25.0

The bank's branch distribution in low- and moderate-income geographies was below the percentage of the population living within those geographies. Two of the branches are reasonably accessible to moderate-income tracts. All branches have ATMs, however, only one location has a full-service ATM.

	T	Distribution of	Branch Opening	gs/Closings											
	Branch Openings/Closings														
Assessment Area	# of Branch Openings # of Branch Closings Net change in Location of Branches (+ or - )														
			Low	Mod	Mid	Upp									
Nashville MSA	0	0	0	0	0		0								
TN Non-MSA	0	1	0	0	0		-1								

The bank did not open or close any branches during the evaluation period in the Nashville MSA. Services and business hours did not vary in a way that inconvenienced its AAs, particularly low- and moderate-income geographies and/or individuals. FFB offered traditional products and services at all branch locations in the AA. Branch hours were consistent across the branches, with extended hours on Fridays, Saturday hours, drive-up facilities, and night deposit services.

## **Community Development Services**

The institution provides a low level of CD services.

During the evaluation period, two FFB employees provided 53 community service hours to three organizations. The bank's services were adequately responsive to the identified needs in the AA of economic development.

#### CD services in the AA include:

- One employee served as a past president and board member to an Area Development Corporation. The organization administers small business financing using the SBA 504 loan program.
- Two employees were board members on organizations that provide community services.

## **Conclusions for Area Receiving a Limited-Scope Review**

Based on a limited-scope review, the bank's performance under the Service Test in the TN Non-MSA is weaker than the bank's overall performance under the Service Test in the full-scope area due to less accessible service delivery systems resulting from branch closure. The bank's performance in the TN Non-MSA did not have an impact on the overall performance.

## **Appendix A: Scope of Examination**

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term "full-scope," and those that received a less comprehensive review, designated by the term "limited-scope".

Time Period Reviewed:	1/1/2021 - 12/31/2023	
Bank Products Reviewed:	Home mortgage, small bus	iness, and small farm loans
	CD loans, qualified investm	
	7 1	,
Affiliate(s)	Affiliate Relationship	Products Reviewed
Not applicable	Not applicable	Not applicable
List of Assessment Areas and Type of		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		
Clarksville, TN-KY MMSA 17300	Full-Scope	Christian County, KY, Trigg County, KY, and Montgomery County, TN
States		
Illinois		
Bloomington, IL MSA 14010	Full-Scope	McLean County, IL
Champaign-Urbana, IL MSA 16580	Limited-Scope	Champaign County, IL
Danville, IL MSA 19180	Limited-Scope	Vermilion County, IL
		Clark, Coles, Crawford, Cumberland, Edgar,
IL Non-MSA	Full-Scope	Franklin, Jasper, Jefferson, Lawrence, Livingston,
		Marion, Richland, and Wayne Counties, IL
Indiana		
Evansville, IN MSA 21780	Full-Scope	Vanderburgh County, IN
Indianapolis, IN MSA 26900	Full-Scope	Putnam County, IN
IN Non-MSA	Limited-Scope	Daviess, Greene, and Knox Counties, IN
Terre Haute, IN MSA 45460	Full-Scope	Clay, Parke, Sullivan, Vermillion, and Vigo
	Tun 200po	Counties, IN
Kentucky		
Bowling Green, KY MSA 14540	Full-Scope	Warren County, KY (2022 and 2023 only)
WAYAL MOA	E II C	Calloway, Fulton, Marshall, and Todd Counties,
KY Non-MSA	Full-Scope	KY for 2021 – 2023 and Breckinridge and Hopkins
O	T ::4-1 C	County, KY added for 2022 and 2023 only.
Owensboro, KY MSA 36980	Limited-Scope	Hancock County, KY (2022 and 2023 only)
Tennessee Nashville-Davidson-Murfreesboro-		
Franklin, TN 34980	Full-Scope	Cheatham County, TN
TN Non-MSA	Limited-Scope	Houston County, TN (2021 and 2022 only)
TIN INOII-IVISA	Linnied-Scope	Houston County, TN (2021 and 2022 only)

## **Appendix B: Summary of MMSA and State Ratings**

RATIN	GS: FIRST FINAN	CIAL BANK, NATI	ONAL ASSOCIA	ΓΙΟΝ										
Overall Bank:	Lending Test Investment Test Service Test Call Bank: Rating* Rating Rating													
First Financial Bank, National Association	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory										
MMSA or State:														
Clarksville, KY-TN MMSA	Low Satisfactory	High Satisfactory	Outstanding	Satisfactory										
Illinois	High Satisfactory	Needs to Improve	High Satisfactory	Satisfactory										
Indiana	Outstanding	High Satisfactory	High Satisfactory	Outstanding										
Kentucky	Low Satisfactory	Outstanding	Outstanding	Satisfactory										
Tennessee	Low Satisfactory	Outstanding	Low Satisfactory	Satisfactory										

<sup>(\*)</sup> 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 (MD):** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an

employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area (MSA):** 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 community development.

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 30<sup>th</sup> 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.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- **Table V.** Assessment Area Distribution of Consumer Loans by Income Category of the Borrower Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

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.

# Multistate Metropolitan Statistical Area Rating Clarksville, TN-KY MMSA

#### Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

2021

	Total Home Mortgage Loans Low-Income Tracts			Moderat	Moderate-Income Tracts			Middle-Income Tracts			-Income	Tracts	Not Available-Income Tracts						
Assessment Area:	#	\$		Overall Market	( )ccunied			% of Owner- Occupied Housing Units			% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units		Aggregate
Clarksville MMSA	44	9,334,878	100.0	21,556	1.9	4.5	1.0	9.6	15.9	6.7	60.3	50.0	60.1	27.9	29.5	32.1	0.3	0.0	0.2
Total	44	9,334,878	100.0	21,556	1.9	4.5	1.0	9.6	15.9	6.7	60.3	50.0	60.1	27.9	29.5	32.1	0.3	0.0	0.2

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data.

Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

#### Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

2022-23

	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-	-Income	e Tracts	Not Available-Income Tracts		
Assessment Area:	#	\$		Overall Market	% of Owner- Occupied Housing Units			% of Owner- Occupied Housing Units			% of Owner- Occupied Housing Units			% of Owner- Occupied Housing Units			% of Owner- Occupied Housing Units		Aggregate
Clarksville MMSA	93	12,657,543	100.0	10,822	2.0	2.2	1.9	16.2	19.4	16.8	46.2	45.2	47.5	35.6	33.3	33.8	0.0	0.0	0.0
Total	93	12,657,543	100.0	10,822	2.0	2.2	1.9	16.2	19.4	16.8	46.2	45.2	47.5	35.6	33.3	33.8	0.0	0.0	0.0

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data.

Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

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 P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borro	he Borrower
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	Т	otal Home Mo	ortgage I	Loans	Low-In	come Bo	orrowers		lerate-Ir Borrowe		Middle-I	ncome l	Borrowers	Upper-I	ncome B	Sorrowers		vailable Borrowe	-Income ers
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Clarksville MMSA	44	9,334,878	100.0	21,556	20.4	13.6	2.3	18.0	13.6	11.3	21.2	22.7	21.1	40.4	34.1	31.6	0.0	15.9	33.7
Total	44	9,334,878	100.0	21,556	20.4	13.6	2.3	18.0	13.6	11.3	21.2	22.7	21.1	40.4	34.1	31.6	0.0	15.9	33.7

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data.

Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

2022-23

	Т	Total Home Mo	rtgage L	oans	Low-In	come Bo	orrowers		erate-In Borrowe		Middle-I	ncome l	Borrowers	Upper-I	ncome F	Borrowers		vailable- Borrowe	-Income ers
Assessment Area:	#	\$		Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Clarksville MMSA	93	12,657,543	100.0	10,822	20.6	8.6	2.1	18.5	22.6	10.8	21.1	22.6	26.4	39.8	38.7	38.2	0.0	7.5	22.4
Total	93	12,657,543	100.0	10,822	20.6	8.6	2.1	18.5	22.6	10.8	21.1	22.6	26.4	39.8	38.7	38.2	0.0	7.5	22.4

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data.

Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

#### Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography

2021

	,	Total Lo Bus	oans to S sinesses	mall	Low-I	ncome '	Γracts	Moderat	e-Incom	e Tracts	Middle	-Income	Tracts	Upper-	Income	Tracts	Not Availa	ble-Inco	ome Tracts
Assessment Area:	#	\$		Overall Market	% Businesses	% Bank Loans	Aggregate												
Clarksville MMSA	90	7,002	100.0	3,876	5.8	13.3	5.0	15.1	11.1	12.1	49.7	45.6	48.6	25.8	28.9	31.5	3.6	1.1	2.8
Total	90	7,002	100.0	3,876	5.8	13.3	5.0	15.1	11.1	12.1	49.7	45.6	48.6	25.8	28.9	31.5	3.6	1.1	2.8

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data.

Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

### Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography

2022-23

		Total Loa Bus	ans to Si inesses	mall	Low-I	ncome [	Γracts	Moderat	e-Incom	e Tracts	Middle	-Income	Tracts	Upper-	Income	Tracts	Not Availa	ble-Inco	ome Tracts
Assessment Area:	#	\$		Overall Market	% Businesses	% Bank Loans	Aggregate												
Clarksville MMSA	32	10,643	100.0	4,546	4.7	12.5	3.0	28.6	15.6	23.6	36.7	34.4	35.9	29.4	37.5	36.9	0.7	0.0	0.7
Total	32	10,643	100.0	4,546	4.7	12.5	3.0	28.6	15.6	23.6	36.7	34.4	35.9	29.4	37.5	36.9	0.7	0.0	0.7

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data. 2023 CRA Aggregate Data was not available. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

## Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues

2021

	Т	otal Loans to S	Small Businesso	es	Businesses	with Revenues	s <= 1MM	Businesses wit		Businesses wi Not Av	
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Clarksville MMSA	90	7,002	100.0	3,876	87.4	14.4	53.0	2.6	16.7	10.0	68.9
Total	90	7,002	100.0	3,876	87.4	14.4	53.0	2.6	16.7	10.0	68.9

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data.

Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

## Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues

2022-23

	Т	Cotal Loans to	Small Business	es	Businesses	with Revenues	s <= 1MM	Businesses wit		Businesses wi Not Av	
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Clarksville MMSA	32	10,643	100.0	4,546	90.7	50.0	57.5	1.8	50.0	7.5	0.0
Total	32	10,643	100.0	4,546	90.7	50.0	57.5	1.8	50.0	7.5	0.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data. 2023 CRA Aggregate Data was not available. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography

	1	Γotal L	oans to I	Farms	Lov	v-Income	Tracts	Modei	ate-Inco	me Tracts	Midd	lle-Incom	ie Tracts	Upp	er-Incom	e Tracts	Not A	Available Tracts	
Assessment Area:	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate									
Clarksville MMSA	12	949	100.0	163	2.7	33.3	1.3	4.3	8.3	3.3	55.3	25.0	66.2	36.8	33.3	29.1	0.8	0.0	0.0
Total	12	949	100.0	163	2.7	33.3	1.3	4.3	8.3	3.3	55.3	25.0	66.2	36.8	33.3	29.1	0.8	0.0	0.0

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data.

Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography

2022-23

	Т	otal L	oans to	Farms	Lov	v-Income	Tracts	Moder	ate-Inco	me Tracts	Midd	lle-Incom	e Tracts	Uppe	er-Incom	e Tracts	Not A	Available Tracts	
Assessment Area:	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate									
Clarksville MMSA	1	15	100.0	175	2.2	0.0	2.8	13.3	0.0	5.7	47.2	0.0	56.5	37.1	100.0	33.9	0.1	0.0	1.1
Total	1	15	100.0	175	2.2	0.0	2.8	13.3	0.0	5.7	47.2	0.0	56.5	37.1	100.0	33.9	0.1	0.0	1.1

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data. 2023 CRA Aggregate Data was not available. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

Table T:	Assessment	Area Distril	bution of Loai	ns to Farms by	<b>Gross Annual Revenues</b>

		Total Loa	ns to Farms		Farms	with Revenues <=	= 1MM	Farms with Ro	evenues > 1MM		Revenues Not ilable
Assessment Area:	#	\$ (000s)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Clarksville MMSA	12	949	100.0	163	97.7	16.7	52.3	1.0	33.3	1.3	50.0
Total	12	949	100.0	163	97.7	16.7	52.3	1.0	33.3	1.3	50.0

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data.

Due to rounding, totals may not equal 100.0%

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

## Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues

2022-23

		Total Loa	ns to Farms		Farms	with Revenues <=	= 1MM	Farms with Ro	evenues > 1MM		Revenues Not ilable
Assessment Area:	#	\$ (000s)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Clarksville MMSA	1	15	100.0	175	98.2	100.0	55.4	0.8	0.0	1.0	0.0
Total	1	15	100.0	175	98.2	100.0	55.4	0.8	0.0	1.0	0.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data. 2023 CRA Aggregate Data was not available. Due to rounding, totals may not equal 100.0%

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

# **State of Illinois**

## Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

2021

	Т	otal Home Mo	rtgage l	Loans	Low-I	Income	Tracts	Moderat	te-Incor	me Tracts	Middle	-Incom	e Tracts	Upper-	Income	e Tracts	Not Av	ailable Tracts	-Income
Assessment Area:	#	\$	% of Total	Overall Market	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate	% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units		Aggregate		% Bank Loans	Aggregate	% of Owner- Occupied Housing Units		Aggregate
Bloomington MSA	14	2,357,936	4.8	8,335	2.3	0.0	2.7	14.3	7.1	11.9	53.9	64.3	49.7	29.5	28.6	35.7	0.0	0.0	0.0
Champaign MSA	43	6,918,679	14.6	7,201	5.5	7.0	4.0	12.1	9.3	10.3	57.6	65.1	58.2	24.7	18.6	27.2	0.1	0.0	0.2
Danville MSA	64	6,054,591	21.8	1,617	2.8	0.0	1.2	11.4	3.1	4.1	49.6	48.4	49.4	36.2	48.4	45.3	0.0	0.0	0.0
IL Non- MSA	173	16,513,172	58.8	6,791	0.2	0.0	0.1	17.1	13.9	17.7	70.9	68.2	69.7	11.6	16.8	12.3	0.1	1.2	0.3
Total	294	31,844,378	100.0	23,944	2.0	1.0	2.3	14.9	10.5	12.5	62.2	63.3	57.9	20.8	24.5	27.2	0.1	0.7	0.1

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

	Т	otal Home Mo	rtgage l	Loans	Low-l	Income	Tracts	Moderat	te-Incor	ne Tracts	Middle	-Incom	e Tracts	Upper	Income	Tracts	Not Av	ailable- Tracts	-Income
Assessment Area:	#	\$		Overall Market			Aggregate	% of Owner- Occupied Housing Units			% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units			% of Owner- Occupied Housing Units		Aggregate
Bloomington MSA	18	1,299,878	3.8	3,701	0.8	0.0	1.2	23.7	16.7	21.9	51.0	44.4	50.2	22.6	16.7	24.0	1.9	22.2	2.6
Champaign MSA	38	19,812,591	8.0	3,218	5.0	7.9	6.1	21.3	5.3	23.6	28.4	47.4	27.3	44.7	39.5	41.7	0.7	0.0	1.2
Danville MSA	85	4,896,882	17.8	1,028	5.6	4.7	3.0	6.2	8.2	3.3	54.4	62.4	53.3	32.1	24.7	40.1	1.7	0.0	0.3
IL Non- MSA	337	20,962,493	70.5	4,116	1.4	1.5	1.8	18.9	15.7	23.4	71.6	72.7	66.6	8.1	10.1	8.2	0.0	0.0	0.0
Total	478	46,971,844	100.0	12,063	2.5	2.5	2.9	19.0	13.6	21.3	56.1	67.8	50.0	21.6	15.3	24.7	0.7	0.8	1.2

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

	Т	otal Home Mo	rtgage L	oans	Low-In	come B	orrowers		erate-Ii Borrowe		Middle-I	ncome l	Borrowers	Upper-I	ncome F	Borrowers		vailable Borrowe	-Income ers
Assessment Area:	#	\$	% 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 MSA	14	2,357,936	4.8	8,335	19.4	7.1	12.5	17.3	21.4	17.8	22.2	14.3	21.8	41.1	50.0	28.8	0.0	7.1	19.1
Champaign MSA	43	6,918,679	14.6	7,201	22.5	7.0	8.9	16.6	44.2	19.6	20.4	16.3	20.8	40.5	25.6	34.5	0.0	7.0	16.3
Danville MSA	64	6,054,591	21.8	1,617	21.7	10.9	5.6	16.8	17.2	19.1	20.7	31.3	23.3	40.8	37.5	33.3	0.0	3.1	18.7
IL Non- MSA	173	16,513,172	58.8	6,791	22.4	14.5	9.3	18.1	24.9	21.0	21.6	25.4	21.5	37.9	31.2	29.4	0.0	4.0	18.8
Total	294	31,844,378	100.0	23,944	21.7	12.2	10.0	17.4	25.9	19.3	21.4	24.8	21.5	39.5	32.7	31.0	0.0	4.4	18.2

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

	Т	otal Home Mo	rtgage L	oans	Low-In	come B	orrowers		lerate-I Borrowe		Middle-I	ncome l	Borrowers	Upper-I	ncome I	Borrowers		vailable Borrowe	-Income ers
Assessment Area:	#	\$	% 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 MSA	18	1,299,878	3.8	3,701	21.0	16.7	15.3	16.9	22.2	22.8	22.4	11.1	22.8	39.7	44.4	21.0	0.0	5.6	18.1
Champaign MSA	38	19,812,591	8.0	3,218	23.4	15.8	11.9	16.4	23.7	21.1	19.8	26.3	18.7	40.4	26.3	28.2	0.0	7.9	20.0
Danville MSA	85	4,896,882	17.8	1,028	22.7	12.9	8.8	18.4	24.7	21.4	18.5	25.9	25.7	40.4	30.6	25.0	0.0	5.9	19.2
IL Non- MSA	337	20,962,493	70.5	4,116	22.3	16.9	14.5	18.9	27.9	27.8	21.3	31.5	21.0	37.4	19.3	22.2	0.0	4.5	14.5
Total	478	46,971,844	100.0	12,063	22.4	16.1	13.6	17.9	26.8	23.9	20.9	29.3	21.3	38.9	22.8	23.7	0.0	5.0	17.5

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography

		Total Loa Bus	ans to Si inesses	mall	Low-In	come Ti	racts	Moderate	-Incom	e Tracts	Middle-l	Income	Tracts	Upper-I	ncome '	Γracts	Not Availal	ole-Inco	me Tracts
Assessment Area:	#	\$		Overall Market	% Businesses	% Bank Loans	Aggreg- ate												
Bloomington MSA	39	3,622	11.3	2,911	8.4	17.9	8.1	12.6	33.3	11.9	54.2	38.5	51.9	24.7	10.3	27.4	0.0	0.0	0.7
Champaign MSA	45	4,039	13.1	3,313	10.9	13.3	11.3	18.3	6.7	16.2	42.0	57.8	44.7	26.4	22.2	26.5	2.3	0.0	1.3
Danville MSA	80	4,243	23.3	843	3.9	0.0	4.3	23.2	15.0	18.3	42.4	36.3	40.5	30.4	48.8	35.9	0.0	0.0	1.0
IL Non- MSA	180	12,420	52.3	3,714	2.0	1.1	1.6	25.3	22.8	21.2	60.2	66.1	63.3	12.0	8.3	12.2	0.5	1.7	1.7
Total	344	24,324	100.0	10,781	6.2	4.4	6.6	20.3	20.1	16.9	52.2	54.9	52.7	20.5	19.8	22.6	0.9	0.9	1.3

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography

		Total Loa Busi	ins to Sr nesses	nall	Low-I	ncome '	Fracts	Moderat	e-Incon	ne Tracts	Middle	-Income	e Tracts	Upper-	Income	Tracts	Not Availa	ble-Inc	ome Tracts
Assessment Area:	#	\$		Overall Market	% Businesses	% Bank Loans	Aggregate												
Bloomington MSA	16	2,854	10.6	2,382	0.8	0.0	0.5	22.4	68.8	22.1	50.5	25.0	48.2	18.0	6.3	23.0	8.3	0.0	6.2
Champaign MSA	19	2,908	12.6	2,981	10.9	26.3	10.9	18.8	10.5	17.5	24.6	31.6	24.6	40.2	31.6	42.9	5.5	0.0	4.2
Danville MSA	46	5,832	30.5	720	15.0	8.7	9.7	9.9	0.0	9.0	46.7	76.1	47.7	25.8	15.2	31.2	2.7	0.0	2.4
IL Non- MSA	70	5,898	46.4	3,475	1.8	0.0	1.9	27.6	27.1	23.7	63.5	71.4	64.1	7.1	1.4	8.9	0.0	0.0	1.5
Total	151	17,492	100.0	9,558	5.3	6.0	4.9	22.4	21.2	20.3	47.6	62.9	46.6	20.9	9.9	24.7	3.7	0.0	3.6

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data. 2023 CRA Aggregate Data was not available. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues

	Т	otal Loans to S	Small Businesse	es	Businesses	with Revenues	s <= 1MM	Businesses wit		Businesses wi Not Av	
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Bloomington MSA	39	3,622	11.3	2,911	81.6	23.1	43.7	4.8	35.9	13.5	41.0
Champaign MSA	45	4,039	13.1	3,313	81.8	24.4	44.7	4.3	17.8	13.9	57.8
Danville MSA	80	4,243	23.3	843	77.3	42.5	42.2	5.4	8.8	17.3	48.8
IL Non-MSA	180	12,420	52.3	3,714	78.6	40.6	51.7	5.1	10.6	16.3	48.9
Total	344	24,324	100.0	10,781	80.1	36.9	46.6	4.8	14.0	15.1	49.1

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues

	Т	Total Loans to	Small Businesse	es	Businesses	with Revenues	s <= 1MM	Businesses wit 1M		Businesses wi Not Av	
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Bloomington MSA	16	2,854	10.6	2,382	84.8	18.8	51.0	3.7	81.3	11.5	0.0
Champaign MSA	19	2,908	12.6	2,981	85.5	68.4	52.5	3.2	31.6	11.3	0.0
Danville MSA	46	5,832	30.5	720	80.8	78.3	50.7	4.4	21.7	14.8	0.0
IL Non-MSA	70	5,898	46.4	3,475	81.8	72.9	55.3	4.2	27.1	14.0	0.0
Total	151	17,492	100.0	9,558	83.5	68.2	53.0	3.8	31.8	12.7	0.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data. 2023 CRA Aggregate Data was not available. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography

		Total Loa	ıns to Fa	arms	Lov	v-Income	e Tracts	Mode	ate-Inco	me Tracts	Midd	lle-Incon	ne Tracts	Upp	er-Incom	e Tracts	Not A	Available Tract	e-Income s
Assessment Area:	#	\$	% of Total	Overall Market		% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate									
Bloomington MSA	8	673	3.9	587	1.7	0.0	0.3	7.1	0.0	0.7	68.6	100.0	81.5	22.6	0.0	17.4	0.0	0.0	0.0
Champaign MSA	5	564	2.5	209	3.1	0.0	0.5	6.9	0.0	4.4	67.0	0.0	73.3	22.9	100.0	20.9	0.1	0.0	1.0
Danville MSA	30	1,126	14.7	137	0.0	0.0	0.0	4.2	3.3	0.0	44.5	33.3	42.1	51.2	63.3	57.9	0.0	0.0	0.0
IL Non- MSA	161	15,523	78.9	1,407	0.1	0.0	0.0	7.7	5.0	3.2	79.7	80.7	78.1	12.5	14.3	18.1	0.0	0.0	0.6
Total	204	17,886	100.0	2,340	0.9	0.0	0.1	7.2	4.4	2.5	72.5	72.5	76.8	19.4	23.0	20.2	0.0	0.0	0.4

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography

		Total Loa	ıns to Fa	ırms	Lov	v-Income	e Tracts	Modei	rate-Inco	me Tracts	Midd	lle-Incon	ne Tracts	Uppe	er-Incom	e Tracts	Not A	Available Tract	e-Income s
Assessment Area:	#	\$	% of Total	Overall Market		% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate									
Bloomington MSA	3	100	2.1	357	0.3	0.0	0.0	17.5	0.0	21.1	63.8	100.0	70.4	15.8	0.0	8.2	2.7	0.0	0.3
Champaign MSA	2	332	1.4	147	3.4	0.0	0.0	10.2	0.0	0.0	44.1	0.0	51.7	41.5	100.0	47.6	0.8	0.0	0.7
Danville MSA	13	1,513	9.0	110	1.6	0.0	0.9	3.5	0.0	0.0	46.4	69.2	46.2	48.5	30.8	50.9	0.0	0.0	1.9
IL Non- MSA	127	21,750	87.6	968	0.4	0.0	0.0	7.7	0.8	4.3	82.1	78.0	88.5	9.7	21.3	6.7	0.0	0.0	0.4
Total	145	23,695	100.0	1,582	1.1	0.0	0.1	9.6	0.7	7.5	68.7	76.6	77.7	20.1	22.8	14.1	0.6	0.0	0.5

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data. 2023 CRA Aggregate Data was not available. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

Ta	ble T:	Assessment	Area Dis	stribution o	of Loans to	Farms by	Gross A	Annual Revenues
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		Total Loa	ns to Farms		Farms	with Revenues <=	= 1MM	Farms with Ro	evenues > 1MM		Revenues Not ilable
Assessment Area:	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Bloomington MSA	8	673	3.9	587	96.9	100.0	68.6	1.5	0.0	1.5	0.0
Champaign MSA	5	564	2.5	209	96.1	100.0	46.6	1.3	0.0	2.7	0.0
Danville MSA	30	1,126	14.7	137	97.6	80.0	45.8	1.5	6.7	0.9	13.3
IL Non-MSA	161	15,523	78.9	1,407	98.5	87.6	57.3	0.7	11.2	0.8	1.2
Total	204	17,886	100.0	2,340	97.7	87.3	58.7	1.0	9.8	1.3	2.9

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

Table T: Assessment Area Distribution of Loans to Farms by Gross Ani
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		Total Loai	ns to Farms		Farms	with Revenues <=	= 1MM	Farms with Ro	evenues > 1MM		Revenues Not ilable
Assessment Area:	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Bloomington MSA	3	100	2.1	357	97.5	100.0	63.1	1.3	0.0	1.3	0.0
Champaign MSA	2	332	1.4	147	97.1	100.0	49.0	0.8	0.0	2.1	0.0
Danville MSA	13	1,513	9.0	110	98.1	84.6	34.0	1.1	15.4	0.8	0.0
IL Non-MSA	127	21,750	87.6	968	98.7	86.6	46.8	0.6	13.4	0.7	0.0
Total	145	23,695	100.0	1,582	98.1	86.9	49.9	0.8	13.1	1.1	0.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data. 2023 CRA Aggregate Data was not available. Due to rounding, totals may not equal 100.0%

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

# State of Indiana

# Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

2021

	Т	otal Home Mo	rtgage I	Loans	Low-l	Income	Tracts	Moderat	te-Incor	ne Tracts	Middle	-Incom	e Tracts	Upper	Income	Tracts		ailable Tracts	-Income
Assessment Area:	# s % of Total Ma  7 1,561,480 0.8 9,5				% of Owner- Occupied Housing Units		Aggregate	<u>-</u> _	% Bank Loans	Aggregate	% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units		Aggregate		% Bank Loans	Aggregate
Evansville MSA	7	1,561,480	0.8	9,511	9.5	14.3	5.7	19.6	42.9	18.8	35.5	14.3	33.9	35.3	28.6	41.4	0.1	0.0	0.2
IN Non- MSA	69	6,840,271	7.8	3,334	0.0	0.0	0.0	13.2	30.4	12.3	60.9	34.8	60.9	25.9	34.8	26.8	0.0	0.0	0.0
Indianapolis MSA	20	2,445,415	2.3	1,882	0.0	0.0	0.0	18.2	25.0	17.3	81.8	75.0	82.7	0.0	0.0	0.0	0.0	0.0	0.0
Terre Haute MSA	786	87,683,027	89.1	5,462	2.4	1.3	1.6	13.8	11.2	13.0	52.3	52.9	50.7	31.5	34.6	34.7	0.0	0.0	0.0
Total	882	98,530,193	100.0	20,189	4.2	1.2	3.1	16.0	13.3	16.0	50.3	51.7	47.5	29.4	33.8	33.3	0.1	0.0	0.1

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

	To	otal Home Mort	gage Lo	ans	Low-l	ncome	Tracts	Moderat	te-Incor	ne Tracts	Middle	-Incom	e Tracts	Upper	-Income	e Tracts	Not Av	ailable Tracts	-Income
Assessment Area:	#	\$		Overall Market	% of Owner- Occupied Housing Units			% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units					Aggregate	% of Owner- Occupied Housing Units		Aggregate
Evansville MSA	12	1,927,500	0.7	4,458	8.6	33.3	7.6	27.1	33.3	29.7	37.7	8.3	34.4	26.3	25.0	28.1	0.3	0.0	0.1
IN Non- MSA	154	10,850,745	8.4	1,783	1.6	1.3	1.0	14.2	16.2	16.5	68.6	76.0	67.8	15.7	6.5	14.6	0.0	0.0	0.0
Indiana- polis MSA	46	6,960,793	2.5	943	0.0	0.0	0.0	14.2	4.3	14.2	85.8	95.7	85.8	0.0	0.0	0.0	0.0	0.0	0.0
Terre Haute MSA	1,613	135,803,258	88.4	2,846	2.7	1.9	2.7	17.9	19.0	20.2	48.4	47.6	46.2	30.9	31.6	30.8	0.0	0.0	0.0
Total	1,825	155,542,296	100.0	10,030	4.4	2.0	4.3	20.2	18.5	23.2	51.4	50.9	48.5	23.9	28.6	23.8	0.1	0.0	0.1

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

	Total Home Mortgage Loans				Low-In	come B	orrowers		erate-Ii Borrowe		Middle-I	ncome l	Borrowers	Upper-I	ncome E	Borrowers		vailable Borrowe	-Income ers
Assessment Area:					% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Evansville MSA	7	1,561,480	0.8	9,511	24.1	0.0	13.6	18.7	14.3	21.8	19.9	14.3	19.1	37.3	28.6	20.4	0.0	42.9	25.1
IN Non- MSA	69	6,840,271	7.8	3,334	18.6	10.1	8.1	18.2	27.5	20.2	22.4	33.3	23.4	40.7	23.2	32.1	0.0	5.8	16.2
Indianapolis MSA	20	2,445,415	2.3	1,882	20.5	25.0	11.4	22.6	20.0	23.3	21.7	30.0	22.2	35.2	20.0	25.0	0.0	5.0	18.1
Terre Haute MSA	786	87,683,027	89.1	5,462	21.2	8.7	6.6	18.2	24.4	18.1	20.5	20.9	21.6	40.0	39.3	34.6	0.0	6.7	19.0
Total	A 882 98,530,193 100.0 20,			20,189	21.7	9.1	10.6	18.7	24.5	20.7	20.8	22.0	20.8	38.9	37.5	26.6	0.0	6.9	21.3

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

	To	otal Home Mort	gage Lo	ans	Low-In	come B	orrowers		lerate-I Borrow		Middle-I	ncome	Borrowers	Upper-I	ncome l	Borrowers		vailable Borrow	-Income ers
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate												
Evansville MSA	12	1,927,500	0.7	4,458	24.4	8.3	12.9	19.2	25.0	22.5	20.8	8.3	18.9	35.7	8.3	22.4	0.0	50.0	23.4
IN Non- MSA	154	10,850,745	8.4	1,783	21.1	15.6	12.5	19.4	23.4	25.3	21.6	31.2	23.8	38.0	21.4	22.9	0.0	8.4	15.5
Indianapolis MSA	46	6,960,793	2.5	943	21.0	6.5	14.0	23.5	32.6	25.5	25.9	26.1	24.1	29.6	32.6	22.2	0.0	2.2	14.3
Terre Haute MSA	1,613	135,803,258	88.4	2,846	21.4	11.5	10.4	17.6	25.3	23.4	21.6	23.3	23.3	39.4	33.2	27.2	0.0	6.6	15.7
Total	1,825	155,542,296	100.0	10,030	22.4	11.7	12.2	19.0	25.3	23.5	21.6	23.9	21.5	37.0	32.1	23.8	0.0	7.0	19.0

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography

	Total 1	Loans to Si	mall Bu	sinesses	Low-I	ncome [	Tracts	Moderat	e-Incon	ne Tracts	Middle-	-Income	e Tracts	Upper-	Income	Tracts	Not Availa	ble-Inc	ome Tracts
Assessment Area:	#	\$		Overall Market	% Businesses	% Bank Loans	Aggregate												
Evansville MSA	39	8,217	3.1	3,341	11.6	5.1	11.3	26.4	33.3	26.7	28.7	17.9	27.9	26.8	38.5	28.7	6.6	5.1	5.4
IN Non- MSA	172	17,729	13.5	1,939	0.0	0.0	0.0	16.1	12.8	10.4	61.2	58.1	64.4	22.8	29.1	24.8	0.0	0.0	0.5
Indiana- polis MSA	43	4,427	3.4	440	0.0	0.0	0.0	17.7	11.6	21.0	82.3	88.4	78.3	0.0	0.0	0.0	0.0	0.0	0.8
Terre Haute MSA	1,024	78,135	80.1	2,951	5.6	6.4	5.3	19.1	15.1	18.8	45.4	46.2	43.7	30.0	32.2	31.1	0.0	0.0	1.0
Total	1,278	108,508	100.0	8,671	6.7	5.3	6.4	21.5	15.3	20.4	43.9	48.4	43.5	25.1	30.9	26.9	2.8	0.2	2.8

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography

		Total Loai Busii	ns to Sm tesses	ıall	Low-I	ncome [	Γracts	Moderat	e-Incon	ne Tracts	Middle-	-Income	e Tracts	Upper-	Income	Tracts	Not Availa	ble-Inc	ome Tracts
Assessment Area:	#	\$		Overall Market	% Businesses	% Bank Loans	Aggregate												
Evansville MSA	20	5,471	2.7	2,971	11.7	0.0	11.6	27.9	45.0	28.1	26.1	20.0	24.6	25.2	35.0	27.2	9.1	0.0	8.6
IN Non- MSA	186	27,978	25.1	1,622	1.5	0.5	0.7	19.8	10.2	15.7	60.1	49.5	62.1	18.6	39.8	20.9	0.0	0.0	0.7
Indianapolis MSA	45	5,652	6.1	438	0.0	0.0	0.0	19.0	13.3	11.5	81.0	86.7	87.5	0.0	0.0	0.0	0.0	0.0	1.0
Terre Haute MSA	489	70,732	66.1	2,107	5.0	9.2	5.3	15.4	16.0	15.1	46.4	47.0	45.9	28.0	24.9	28.8	5.1	2.9	4.8
Total	740	109,833	100.0	7,138	6.8	6.2	6.7	21.8	15.1	20.7	42.8	49.3	42.8	23.1	27.4	24.6	5.5	1.9	5.3

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data. 2023 CRA Aggregate Data was not available. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues

	Т	Total Loans to S	Small Businesse	es	Businesses	with Revenues	s <= 1MM	Businesses wit 1M		Businesses wi Not Av	
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Evansville MSA	39	8,217	3.1	3,341	82.6	28.2	44.9	5.9	41.0	11.6	30.8
IN Non-MSA	172	17,729	13.5	1,939	84.1	45.3	41.0	4.0	22.7	11.9	32.0
Indianapolis MSA	43	4,427	3.4	440	85.8	44.2	44.0	2.8	30.2	11.4	25.6
Terre Haute MSA	1,024	78,135	80.1	2,951	81.9	25.2	40.2	4.5	17.5	13.6	57.3
Total	1,278	108,508	100.0	8,671	82.9	28.6	42.7	4.9	19.3	12.3	52.0

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues

	Т	Cotal Loans to S	Small Businesse	es	Businesses	with Revenues	s <= 1MM	Businesses wit 1M		Businesses wi Not Av	
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Evansville MSA	20	5,471	2.7	2,971	86.6	65.0	48.5	4.1	35.0	9.3	0.0
IN Non-MSA	186	27,978	25.1	1,622	86.8	67.7	55.3	3.1	32.3	10.1	0.0
Indianapolis IN MSA	45	5,652	6.1	438	88.6	51.1	49.2	2.2	48.9	9.2	0.0
Terre Haute MSA	489	70,732	66.1	2,107	85.6	50.1	49.4	3.4	49.5	11.0	0.4
Total	740	109,833	100.0	7,138	86.5	55.0	50.3	3.6	44.7	10.0	0.3

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data. 2023 CRA Aggregate Data was not available. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography

		Total Loa	ıns to Fa	ırms	Lov	v-Income	Tracts	Modei	ate-Inco	me Tracts	Midd	lle-Incon	ne Tracts	Upp	er-Incom	e Tracts	Not A	Available Tract	e-Income s
Assessment Area:	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate												
Evansville MSA	0	0	0.0	49	7.5	0.0	4.1	16.6	0.0	4.1	26.5	0.0	14.3	48.2	0.0	75.5	1.3	0.0	2.0
IN Non- MSA	101	9,518	22.7	543	0.0	0.0	0.0	3.4	1.0	1.6	66.5	41.6	65.8	30.1	57.4	32.2	0.0	0.0	0.5
Indianapolis MSA	9	409	2.0	46	0.0	0.0	0.0	23.1	0.0	10.8	76.9	100.0	89.2	0.0	0.0	0.0	0.0	0.0	0.0
Terre Haute MSA	334	27,040	75.2	585	1.3	0.0	0.0	8.3	3.9	4.8	56.7	44.6	68.5	33.7	51.5	26.7	0.0	0.0	0.0
Total	444	36,967	100.0	1,223	2.0	0.0	0.3	9.8	3.2	3.2	55.9	45.0	64.5	32.1	51.8	31.6	0.3	0.0	0.4

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography

		Total Loa	ns to Fa	arms	Lov	v-Income	Tracts	Modei	ate-Inco	me Tracts	Midd	lle-Incon	ne Tracts	Upp	er-Incom	e Tracts	Not A	Available Tract	e-Income s
Assessment Area:	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate												
Evansville MSA	0	0	0.0	32	5.6	0.0	9.4	20.5	0.0	3.1	37.6	0.0	53.1	32.9	0.0	31.3	3.3	0.0	3.1
IN Non- MSA	103	14,926	25.5	404	0.0	0.0	0.0	3.4	0.0	0.3	69.2	81.6	72.2	27.4	18.4	27.6	0.0	0.0	0.0
Indianapolis MSA	7	849	1.7	29	0.0	0.0	0.0	9.4	0.0	8.3	90.6	100.0	91.7	0.0	0.0	0.0	0.0	0.0	0.0
Terre Haute MSA	294	43,646	72.8	368	1.3	0.0	0.0	10.6	6.8	8.1	53.4	62.2	63.5	34.6	31.0	28.4	0.1	0.0	0.0
Total	404	59,421	100.0	833	1.7	0.0	0.5	10.2	5.0	3.4	58.9	67.8	69.0	28.5	27.2	27.0	0.7	0.0	0.2

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data. 2023 CRA Aggregate Data was not available. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

Ta	ble T:	Assessment	Area Dis	stribution o	of Loans to	Farms by	Gross A	Annual Revenues
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		Total Loa	ns to Farms		Farms	with Revenues <=	= 1MM	Farms with Ro	evenues > 1MM		Revenues Not ilable
Assessment Area:	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Evansville MSA	0	0	0.0	49	97.0	0.0	32.7	1.3	0.0	1.7	0.0
IN Non-MSA	101	9,518	22.7	543	96.8	54.5	62.2	1.8	33.7	1.4	11.9
Indianapolis MSA	9	409	2.0	46	99.1	100.0	27.0	0.4	0.0	0.4	0.0
Terre Haute MSA	334	27,040	75.2	585	98.0	73.1	50.6	0.8	11.7	1.2	15.3
Total	444	36,967	100.0	1,223	97.5	69.4	54.9	1.2	16.4	1.3	14.2

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Re
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		Total Loai	ns to Farms		Farms	with Revenues <=	= 1MM	Farms with Re	evenues > 1MM		Revenues Not ilable
Assessment Area:	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Evansville MSA	0	0	0.0	32	97.8	0.0	31.3	0.8	0.0	1.3	0.0
IN Non-MSA	103	14,926	25.5	404	97.0	62.1	61.4	1.3	37.9	1.7	0.0
Indianapolis MSA	7	849	1.7	29	99.7	100.0	20.8	0.0	0.0	0.4	0.0
Terre Haute MSA	294	43,646	72.8	368	98.4	79.6	46.0	0.7	20.1	1.0	0.3
Total	404	59,421	100.0	833	97.9	75.5	53.0	0.8	24.3	1.2	0.2

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data. 2023 CRA Aggregate Date was not available. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

# **State of Kentucky**

# Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

2021

	Т	otal Home Mo	rtgage l	Loans	Low-I	ncome	Tracts	Moderat	e-Incon	ne Tracts	Middle	-Incom	e Tracts	Upper-	Income	Tracts	Not Av	ailable- Tracts	Income
Assessment Area:	#	\$		Overall Market	Occunied		Aggregate	% of Owner- Occupied Housing Units			% of Owner- Occupied Housing Units			-		Aggregate			Aggregate
KY Non- MSA	50	7,217,691	100.0	2,342	0.0	0.0	0.0	7.3	2.0	8.2	58.1	60.0	53.5	34.6	38.0	38.3	0.0	0.0	0.0
Total	50	7,217,691	100.0	2,342	0.0	0.0	0.0	7.3	2.0	8.2	58.1	60.0	53.5	34.6	38.0	38.3	0.0	0.0	0.0

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data.

Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

	Т	otal Home Mo	rtgage I	oans	Low-l	ncome	Tracts	Moderat	e-Incor	ne Tracts	Middle	e-Incom	e Tracts	Upper	-Income	e Tracts		ailable- Tracts	-Income
Assessment Area:	#	\$		Overall Market	% of Owner- Occupied Housing Units				% Bank Loans	Aggregate	% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate	% of Owner- Occupied Housing Units		00 0
Bowling Green MSA	50	11,991,784	21.6	3,073	1.0	2.0	1.7	15.7	20.0	14.0	45.3	20.0	41.7	37.8	58.0	42.3	0.2	0.0	0.3
KY Non- MSA	165	12,316,441	71.1	2,719	0.6	0.0	0.4	6.4	13.9	6.6	41.9	44.2	51.4	50.2	40.6	40.9	1.0	1.2	0.6
Owensboro MSA	17	952,922	7.3	192	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	232	25,261,147	100.0	5,984	0.7	0.4	1.1	9.7	14.2	10.2	45.2	43.1	48.0	43.7	41.4	40.3	0.7	0.9	0.4

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

Table P: Assessment	Area Distribution of Hor	ne Mortgage Loans by	Income Category of the Borrower

	,	Total Home Mo	rtgage Lo	oans	Low-In	come B	orrowers		erate-Ir Borrowe		Middle-I	ncome ]	Borrowers	Upper-I	ncome B	Borrowers		vailable- Borrowe	-Income ers
Assessment Area:	a: " Total Market			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	50	7,217,691	100.0	2,342	16.6	4.0	3.6	16.2	18.0	12.8	18.6	16.0	17.5	48.5	52.0	46.2	0.0	10.0	19.9
Total	50	7,217,691	100.0	2,342	16.6	4.0	3.6	16.2	18.0	12.8	18.6	16.0	17.5	48.5	52.0	46.2	0.0	10.0	19.9

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

	Т	otal Home Mor	tgage L	oans	Low-In	come B	orrowers		erate-I1 Borrowe		Middle-l	ncome l	Borrowers	Upper-I	icome I	Borrowers		vailable- Borrowe	-Income ers
Assessment Area:	#	\$		Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Bowling Green MSA	50	11,991,784	21.6	3,073	20.6	2.0	4.5	15.9	6.0	14.5	18.8	2.0	22.2	44.8	24.0	38.9	0.0	66.0	19.9
KY Non- MSA	165	12,316,441	71.1	2,719	17.8	6.1	4.7	15.2	15.8	15.0	19.4	23.0	21.3	47.6	49.7	39.1	0.0	5.5	19.9
Owensboro MSA	17	952,922	7.3	192	22.9	11.8	13.5	19.2	41.2	33.9	19.0	11.8	18.2	38.9	17.6	19.3	0.0	17.6	15.1
Total	232	25,261,147	100.0	5,984	19.1	5.6	4.9	15.6	15.5	15.4	19.1	17.7	21.7	46.1	41.8	38.3	0.0	19.4	19.7

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

		Total Lo Bus	ans to S sinesses	mall	Low-I	ncome T	Γracts	Moderat	e-Incom	ne Tracts	Middle	-Income	Tracts	Upper-	Income	Tracts	Not Availa	ble-Inco	ome Tracts
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate												
KY Non- MSA	93	5,997	100.0	1,298	0.0	0.0	0.0	15.9	10.8	15.5	51.3	55.9	53.4	32.9	33.3	30.2	0.0	0.0	0.9
Total	93	5,997	100.0	1,298	0.0	0.0	0.0	15.9	10.8	15.5	51.3	55.9	53.4	32.9	33.3	30.2	0.0	0.0	0.9

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography

	,	Total Loa Busi	ns to Si nesses	nall	Low-I	ncome [	Γracts	Moderat	e-Incon	ne Tracts	Middle	-Income	Tracts	Upper-	Income	Tracts	Not Availa	ble-Inco	ome Tracts
Assessment Area:	#	\$		Overall Market	% Businesses	% Bank Loans	Aggregate												
Bowling Green MSA	54	7,167	45.0	3,290	4.6	1.9	3.1	18.5	20.4	17.8	39.2	59.3	39.3	33.6	16.7	36.4	4.1	1.9	3.5
KY Non- MSA	64	9,613	53.3	2,279	2.2	0.0	2.3	14.4	15.6	12.6	40.8	34.4	42.6	41.8	50.0	40.7	0.8	0.0	1.8
Owensboro MSA	2	30	1.7	106	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	97.2	0.0	0.0	0.0	0.0	0.0	2.8
Total	120	16,810	100.0	5,675	3.4	0.8	2.7	16.3	17.5	15.4	41.1	46.7	41.7	36.6	34.2	37.4	2.6	0.8	2.8

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data. 2023 CRA Aggregate Data was not available. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

#### Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues

2021

	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
KY Non-MSA	93	5,997	100.0	1,298	84.7	22.6	59.3	3.7	8.6	11.6	68.8
Total	93	5,997	100.0	1,298	84.7	22.6	59.3	3.7	8.6	11.6	68.8

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data.

Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

#### Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues

2022-23

	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Bowling Green MSA	54	7,167	45.0	3,290	89.1	51.9	53.9	2.8	48.1	8.1	0.0
KY Non-MSA	64	9,613	53.3	2,279	86.4	70.3	57.4	3.1	29.7	10.6	0.0
Owensboro KY MSA	2	30	1.7	106	84.4	100.0	63.9	3.1	0.0	12.5	0.0
Total	120	16,810	100.0	5,675	87.8	62.5	55.5	2.9	37.5	9.3	0.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data. 2023 CRA Aggregate Data was not available. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

# Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography

2021

	,	Total Lo	ans to F	arms	Low	v-Income	Tracts	Modei	ate-Inco	me Tracts	Midd	lle-Incom	e Tracts	Uppe	er-Incom	e Tracts	Not A	Available Tracts	-Income
Assessment Area:	# S Total Market Farms Bank Loans Aggrega			Aggregate	% Farms	% Bank Loans	Aggregate												
KY Non- MSA	33	2,884	100.0	208	0.0	0.0	0.0	8.5	6.1	14.3	65.4	69.7	67.4	26.2	24.2	18.3	0.0	0.0	0.0
Total	33	2,884	100.0	208	0.0	0.0	0.0	8.5	6.1	14.3	65.4	69.7	67.4	26.2	24.2	18.3	0.0	0.0	0.0

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography

		Total Lo	ans to F	arms	Lov	v-Income	Tracts	Modei	rate-Inco	me Tracts	Midd	lle-Incom	ne Tracts	Uppe	er-Incom	e Tracts	Not A	Available Tracts	
Assessment Area:	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate									
Bowling Green MSA	3	88	7.7	157	2.3	0.0	0.0	10.3	0.0	2.6	53.1	0.0	76.0	33.0	100.0	21.4	1.4	0.0	0.0
KY Non- MSA	33	5,348	84.6	275	0.7	0.0	0.0	8.6	24.2	10.4	39.0	12.1	35.4	51.5	63.6	54.2	0.3	0.0	0.0
Owensboro MSA	3	56	7.7	41	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	39	5,492	100.0	473	1.2	0.0	0.0	8.9	20.5	6.8	46.0	17.9	54.7	43.3	61.5	38.4	0.6	0.0	0.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data. 2023 CRA Aggregate Data was not available. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

		Total Loa	ns to Farms		Farms	with Revenues <=	= 1MM	Farms with Ro	evenues > 1MM		Revenues Not ilable
Assessment Area:	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
KY Non-MSA	33 2,884 100.0 208				98.6	75.8	52.6	0.9	9.1	0.5	15.2
Total	33	2,884	100.0	208	98.6	75.8	52.6	0.9	9.1	0.5	15.2

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data.

Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

# Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues

2022-23

		Total Loa	ns to Farms		Farms	with Revenues <=	= 1MM	Farms with R	evenues > 1MM		Revenues Not ilable
Assessment Area:	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Bowling Green MSA	3	88	7.7	157	98.5	100.0	49.4	0.5	0.0	1.1	0.0
KY Non-MSA	33	5,348	84.6	275	98.4	66.7	54.2	0.8	33.3	0.8	0.0
Owensboro KY MSA	3	56	7.7	41	98.4	100.0	76.9	0.0	0.0	1.6	0.0
Total	39	5,492	100.0	473	98.5	71.8	54.5	0.6	28.2	0.9	0.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data. 2023 CRA Aggregate Data was not available. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

# **State of Tennessee**

## Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

2021

	T	otal Home Mo	ortgage l	Loans	Low-I	ncome '	Tracts	Moderat	te-Incon	ne Tracts	Middle	-Income	Tracts	Upper-	Income	Tracts	Not Av	ailable- Tracts	Income
Assessment Area:	#	\$		Overall Market	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate	% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units	% Bank Loans	00 0			Aggregate
Nashville MSA	22	3,529,317	84.6	2,877	0.0	0.0	0.0	41.3	45.5	39.1	58.7	54.5	60.9	0.0	0.0	0.0	0.0	0.0	0.0
TN Non- MSA	4	456,665	15.4	336	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	26	3,985,982	100.0	3,213	0.0	0.0	0.0	34.3	38.5	35.0	65.7	61.5	65.0	0.0	0.0	0.0	0.0	0.0	0.0

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

	Т	otal Home Mo	rtgage l	Loans	Low-I	ncome '	Tracts	Moderat	te-Incon	ne Tracts	Middle	-Incom	e Tracts	Upper-	Income	Tracts	Not Av	ailable- Tracts	Income
Assessment Area:	#	\$		Overall Market	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate	% of Owner- Occupied Housing Units			% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate
Nashville MSA	50	4,811,447	82.0	1,297	0.0	0.0	0.0	28.5	22.0	25.5	71.5	78.0	74.5	0.0	0.0	0.0	0.0	0.0	0.0
TN Non- MSA	11	1,693,275	18.0	224	0.0	0.0	0.0	0.0	0.0	0.0	72.5	81.8	81.3	27.5	18.2	18.8	0.0	0.0	0.0
Total	61	6,504,721	100.0	1,521	0.0	0.0	0.0	23.8	18.0	21.8	71.7	78.7	75.5	4.5	3.3	2.8	0.0	0.0	0.0

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data.

Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

	Т	otal Home Mo	rtgage I	Loans	Low-In	come Bo	orrowers		erate-Ii Borrowe		Middle-I	ncome I	Borrowers	Upper-I	icome B	orrowers		vailable- Borrowe	Income ers
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Nashville MSA	22	3,529,317	84.6	2,877	23.3	13.6	5.9	19.3	31.8	20.0	21.9	31.8	22.7	35.6	22.7	28.9	0.0	0.0	22.5
TN Non- MSA	4	456,665	15.4	336	19.2	0.0	5.4	15.4	0.0	8.3	25.7	25.0	22.6	39.8	75.0	40.2	0.0	0.0	23.5
Total	26	3,985,982	100.0	3,213	22.6	11.5	5.9	18.6	26.9	18.8	22.6	30.8	22.7	36.3	30.8	30.1	0.0	0.0	22.6

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

	Т	otal Home M	ortagae	Loans	I ow_In	come R	orrowers	Mod	erate-I	ncomo	Middle	-Income Borro	wore	Unner-I	ncome l	Borrowers	Not Av	vailable	-Income
		otal Home M	ortgage	Loans	Low-III	come b	onowers		Borrow		Middle	-Income Borro	wers	оррег-п	ilcome i	bollowers		Borrow	
Assessment Area:	#	\$		Overall Market	Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Nashville MSA	50	4,811,447	82.0	1,297	23.1	12.0	6.3	19.7	26.0	24.1	28.1	32.0	26.0	29.1	26.0	26.7	0.0	4.0	16.9
TN Non- MSA	11	1,693,275	18.0	224	14.6	0.0	3.6	23.3	18.2	17.9	19.0	18.2	20.5	43.1	63.6	46.4	0.0	0.0	11.6
Total	61	6,504,721	100.0	1,521	21.9	9.8	5.9	20.2	24.6	23.2	26.9	29.5	25.2	31.0	32.8	29.6	0.0	3.3	16.1

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data.

Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

## Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography

2021

	Т		oans to S isinesses		Low-I	ncome T	Γracts	Moderat	e-Incom	e Tracts	Middle	-Income	Tracts	Upper-	Income	Tracts	Not Availa	ble-Inco	ome Tracts
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate												
Nashville MSA	16	519	53.3	944	0.0	0.0	0.0	39.3	31.3	38.5	60.7	68.8	61.2	0.0	0.0	0.0	0.0	0.0	0.3
TN Non- MSA	14	140	46.7	69	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	30	659	100.0	1,013	0.0	0.0	0.0	34.3	16.7	36.3	65.7	83.3	63.4	0.0	0.0	0.0	0.0	0.0	0.3

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

Table (	2: Assessment	Area Distribi	ition of Loans	s to Small B	usinesses by	Income C	ategory o	of the Geog	ranhv
I WOIC \	Z · I IDDCDDIIICIIC	THE COLD INCIDE	ation of Louis	, to Simula D	asinesses by	THEOTHE C		or the Geog	- ee p ,

	,		oans to S usinesses		Low-I	ncome T	Tracts	Moderat	e-Incom	ne Tracts	Middle	-Income	Tracts	Upper-	Income	Tracts	Not Availa	ble-Inco	ome Tracts
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate												
Nashville MSA	3	249	100.0	926	0.0	0.0	0.0	22.6	33.3	23.0	77.4	66.7	76.3	0.0	0.0	0.0	0.0	0.0	0.6
TN Non- MSA	0	0	0.0	87	0.0	0.0	0.0	0.0	0.0	0.0	62.4	0.0	79.3	37.6	0.0	20.7	0.0	0.0	0.0
Total	3	249	100.0	1,013	0.0	0.0	0.0	20.0	33.3	21.0	75.7	66.7	76.6	4.4	0.0	1.8	0.0	0.0	0.6

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data. 2023 CRA Aggregate Data was not available. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

#### Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues

2021

	r	Total Loans to	Small Business	es	Businesses	with Revenues	s <= 1MM	Businesses wit		Businesses with Revenues Not Available	
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Nashville MSA	16	519	53.3	944	90.5	12.5	49.8	2.2	0.0	7.3	87.5
TN Non-MSA	14	140	46.7	69	84.7	7.1	60.0	4.4	0.0	10.9	92.9
Total	30	659	100.0	1,013	89.8	10.0	50.4	2.5	0.0	7.7	90.0

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data.

Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

#### Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues

2022-23

	Т	otal Loans to	Small Busines	ses	Businesses with	h Revenues <=	1MM	Businesses wi		Businesses with Revenues Not Available	
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Nashville MSA	3	249	100.0	926	92.6	100.0	57.6	1.6	0.0	5.8	0.0
TN Non-MSA	0	0	0.0	87	87.1	0.0	58.6	3.5	0.0	9.4	0.0
Total	3	249	100.0	1,013	92.0	100.0	57.7	1.9	0.0	6.2	0.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data. 2023 CRA Aggregate Data was not available. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography

	Total Loans to Farms			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
Assessment Area:	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Nashville MSA	1	5	100.0	25	0.0	0.0	0.0	40.7	0.0	54.2	59.3	100.0	45.8	0.0	0.0	0.0	0.0	0.0	0.0
TN Non- MSA	0	0	0.0	19	0.0	0.0	0.0	0.0	0.0	0.0	100.0	0.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	1	5	100.0	44	0.0	0.0	0.0	35.5	0.0	30.2	64.5	100.0	69.8	0.0	0.0	0.0	0.0	0.0	0.0

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

## Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography

2022-23

	Total Loans to Farms			o Farms	Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area:	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Nashville MSA	0	0	0.0	14	0.0	0.0	0.0	19.1	0.0	28.6	80.9	0.0	71.4	0.0	0.0	0.0	0.0	0.0	0.0
TN Non- MSA	0	0	0.0	5	0.0	0.0	0.0	0.0	0.0	0.0	88.9	0.0	80.0	11.1	0.0	20.0	0.0	0.0	0.0
Total	0	0	0.0	19	0.0	0.0	0.0	16.9	0.0	21.1	81.8	0.0	73.7	1.3	0.0	5.3	0.0	0.0	0.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data. 2023 CRA Aggregate Data was not available. Due to rounding, totals may not equal 100.0%

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

		Total Loa	ns to Farms		Farms	with Revenues <=	= 1MM	Farms with R	evenues > 1MM	Farms with Revenues Not Available		
Assessment Area:	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Nashville MSA	1	5	100.0	25	99.3	0.0	50.0	0.0	0.0	0.7	100.0	
TN Non-MSA	0	0	0.0	19	100.0	0.0	26.3	0.0	0.0	0.0	0.0	
Total	1	5	100.0	44	99.4	0.0	39.5	0.0	0.0	0.6	100.0	

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data.

Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues

2022-23

		Total Loa	ns to Farms		Farr	ns with Revenues <= 1	ММ	Farms with Re	evenues > 1MM	Farms with Revenues Not Available		
Assessment Area:	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Nashville MSA	0	0	0.0	14	99.0	0.0	71.4	0.0	0.0	1.0	0.0	
TN Non-MSA	0	0	0.0	5	100.0	0.0	40.0	0.0	0.0	0.0	0.0	
Total	0	0	0.0	19	99.1	0.0	63.2	0.0	0.0	0.9	0.0	

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data. 2023 CRA Aggregate Data was not available. Due to rounding, totals may not equal 100.0%.

First Financial Bank NA (Charter 47) excluded from Aggregate Data.