

## **PUBLIC DISCLOSURE**

June 06, 2022

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Home Bank SB Charter Number: 704255

59 W. Washington St. Martinsville, IN 46151-1425

Office of the Comptroller of the Currency

Indianapolis Office 8777 Purdue Rd., 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 Outstanding.

The lending test is rated: Outstanding

The major factors that support this rating include:

• The overall borrower distribution is excellent;

- The overall geographic distribution of loans is excellent; and,
- The levels of qualified investments and community development services are excellent.

#### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the assessment area (AA), the bank's loan-to-deposit (LTD) ratio is reasonable

The OCC evaluated the LTD ratio from the quarter ended March 31, 2019, through the quarter ended December 31, 2021. The quarterly LTD ratio averaged 65.3 percent over the 12 quarters since the prior CRA evaluation. During this time, the LTD ratio ranged from a high of 74.3 percent as of December 31, 2019, to a low of 50.5 percent as of December 31, 2021. The OCC also considered the average LTD ratio of comparable banks with offices in the AA. Other similarly situated institutions have average LTD ratios ranging from 61.5 percent to 82.8 percent.

# **Lending in Assessment Area**

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

The bank originated and purchased 76.3 percent of its total loans by number inside the bank's AA during the evaluation period. This analysis is performed at the bank level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Out	side of the	Assess	sment Area	1							
l O-t	N	umber o	f Loans		Total #	Dollar A	<b>-</b>				
Loan Category	Inside	е	Outsic	le		Inside	9	Outsid	Total \$(000s)		
	#	%	#	%	#	\$	%	\$	%	φ(000S)	
Home Mortgage	987	76.3	307	23.7	1294	181,634	72.4	69,237	27.6	250,872	
Total	987	76.3	307	23.7	1294	181,634	72.4	69,237	27.6	250,872	

# **Description of Institution**

Home Bank Savings Bank (Home Bank or bank) is a federally chartered, mutual savings bank. The bank is a single-state institution headquartered in Martinsville, IN and serves the surrounding areas. As of December 31, 2021, Home Bank had \$416 million in total assets and tier 1 capital of \$47 million. Home Bank was founded in 1891 and has maintained its mutual structure throughout its history, operating without a holding company. The bank does not have any subsidiaries with activities considered in this evaluation.

Home Bank offers traditional loan and deposit products and services. As of December 31, 2021, the bank reported \$178 million in outstanding loans. Home Bank's primary lending product is residential real estate mortgage loans. The loan portfolio is composed of 57.4 percent 1-4 family residential real estate, 39.3 percent total commercial, 1.8 percent consumer, and 1.3 percent farm by dollar volume of loans. Net loans and leases represent 42.9 percent of average assets and 53 percent of total deposits.

Home bank does not have any legal, financial, or other factors that would impede its ability to meet the credit needs of the AA. Home Bank was assigned a rating of "Outstanding" in its prior CRA performance evaluation, dated March 25, 2019.

# **Scope of the Evaluation**

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

Home Bank was evaluated using the Small Bank procedures to assess the bank's record of meeting the credit needs of its community through a lending test. The evaluation period for this review is January 1, 2019, through December 31, 2021. The OCC evaluated home mortgage loan originations including home purchase, home refinance, and home improvement loans.

Bank management also requested a review of the bank's performance in making qualified community development (CD) investments and providing CD services, which includes a review of branches that enhance credit availability in the AA. Examiners reviewed CD activity dated from January 1, 2019, through December 31, 2021. Given this bank was evaluated under the Small Bank procedures, the community development information can only enhance the bank's CRA rating and cannot have a negative impact on its overall rating.

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

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

#### **Ratings**

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

The bank's overall rating is the same as the state rating for Indiana. The state rating is based on performance in the bank's only AA, the Indianapolis MSA.

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

# **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, 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 AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

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

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

# **State Rating**

#### State of Indiana

CRA rating for the State of Indiana: Outstanding

The Lending Test is rated: Outstanding

The major factors that support this rating include:

- The overall borrower distribution is excellent;
- The overall geographic distribution of loans is excellent; and,
- An excellent level of qualified investments and community development services.

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

Home Bank has four branches in addition to the main office, and five deposit-taking automated teller machines (ATMs). The bank has one AA incorporating all of Hendricks County and Morgan County and the northern portion of Johnson County. The AA, Indianapolis MSA, includes a portion of the Indianapolis-Carmel-Anderson MSA #26900. The AA does not arbitrarily exclude any low- or moderate-income (LMI) census tracts (CTs) and otherwise meets the requirements of the CRA.

According to the June 30, 2021, FDIC Deposit Market Share Report, Home Bank's deposits totaled \$316 million, or 3.9 percent share of the market. Home Bank ranks 11th in deposit market share in the AA. This represents all of Home Bank's deposit base. Major competitors are JPMorgan Chase Bank, First Merchants Bank, PNC Bank, and Huntington National Bank. The bank competes directly within the AA against institutions significantly larger in market share and branching networks to provide 3.3 percent of the number of home mortgages between 2019 and 2021.

Home Bank offers traditional, non-complex products and services to its local community, including an array of deposit products through its branches. The bank provides a variety of lending services, including residential mortgages, commercial loans, and consumer loans. Delivery channels include internet and mobile banking, telephone banking, and ATMs, in addition to its branches.

#### Indianapolis MSA Assessment Area

As	ssessment A	rea: Indian	apolis MSA			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	48	2.1	14.6	45.8	37.5	0.0
Population by Geography	325,127	1.3	9.8	42.9	46.1	0.0
Housing Units by Geography	126,507	1.3	10.5	44.4	43.8	0.0
Owner-Occupied Units by Geography	90,484	0.7	7.6	42.6	49.0	0.0
Occupied Rental Units by Geography	27,571	3.2	18.0	50.3	28.5	0.0
Vacant Units by Geography	8,452	2.0	16.3	43.8	37.8	0.0
Businesses by Geography	31,395	1.2	11.3	40.9	46.6	0.0
Farms by Geography	1,196	0.5	7.6	50.8	41.1	0.0
Family Distribution by Income Level	87,657	14.4	16.6	22.1	46.9	0.0
Household Distribution by Income Level	118,055	15.2	13.8	19.3	51.6	0.0
Median Family Income MSA - 26900 Indianapolis-Carmel-Anderson, IN MSA		\$66,803 Median Housing Value				
	•		Median Gross	Rent		\$886
			Families Belov	v Poverty Leve	el	5.8%

Source: 2015 ACS and 2021 D&B Data

Due to rounding, totals may not equal 100.0%

Unemployment within the AA ranged from 1 to 1.2 percent as of December 2021 (U.S. Bureau of Labor Statistics) down from a high of 12.7 percent in April 2020. This is well below the general level of unemployment within Indiana at 1.5 percent in December 2021, down from a high of 16.5 percent. The largest employment sectors within the AA are transportation, logistics, healthcare, and government. Transportation and logistics are largely centered in Hendricks County near the Indianapolis International Airport.

Census data shows a 2020 county level poverty rate within the AA between 5.2 percent for Hendricks County to 8.5 percent for Morgan County.

During the reviewed period, the COVID-19 pandemic resulted in significant economic impacts within the AA. Throughout the nation and within the AA, housing prices increased significantly in 2020 and 2021, reducing availability of housing stock within price ranges affordable to LMI individuals. Additional economic impacts, shutdowns, and layoffs more heavily impacted lower-wage workers whose jobs in service sector or retail cannot be performed remotely.

Two community contacts were identified within the AA. Community contacts within Morgan County identified a lack of higher-paying jobs and a need for institutions to assist in the financial education of area business. Community contacts within Hendricks County also identified financial education for businesses as an ongoing need, with workforce development as an additional opportunity.

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

#### Scope of Evaluation in Indiana

Within the State of Indiana, the Indianapolis MSA AA received a full-scope review.

#### **Lending Test**

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

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

Based on a full-scope review, the bank's performance in the Indianapolis MSA AA is excellent. Home Bank originated a smaller volume of loans to small businesses, small farms, and consumers. An analysis of loans for these product types is not meaningful, and those sections have been omitted from the PE.

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

The bank exhibits **excellent** geographic distribution of loans in the State.

#### 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.

The geographic distribution of home mortgage loans made over the period 2019 through 2021 is excellent. The percentage of loans made in low-income census tract was 4 percent, which significantly exceeds the percentage of owner-occupied units and aggregate lending in the AA. The percentage of loans made in moderate-income tracts was 13.9 percent, which significantly exceeds the percentage of owner-occupied units and aggregate lending in the AA.

#### Lending Gap Analysis

There are no unexplained conspicuous lending gaps identified during the evaluation period.

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

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

#### 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.

The overall distribution of loans to borrowers of different incomes is excellent. Borrower distribution of home mortgages in 2019, 2020, and 2021 is excellent. Home Bank originated 9.5 percent of its home mortgage loans to low-income borrowers and 20.5 percent to moderate-income borrowers. This percentage of loans exceeds the aggregate levels of lending to both groups and exceeds the demographic

indicator for moderate-income borrowers. Given consideration of home prices and Home Bank's market share within the AA, this level of lending exceeds expectations.

# **Responses to Complaints**

There were no complaints received by the bank related to its performance in helping to meet the credit needs of its AA

#### **Community Development**

Based on a full-scope review, the bank exhibits excellent responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area. Performance related to community development activities had a positive effect on the bank's rating in the state.

#### **Number and Amount of Community Development Loans**

Refer to the Community Development Loans table below for the facts and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Community Development Loans													
Assessment Area	Total												
	#	% of Total #	\$(000's)	% of Total \$									
Indianapolis MSA AA	169	100.0	9,760	100.0									

The Community Development Loans Tables, shown above, sets forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank originated 169 CD loans totaling \$9.8 million in the AA during the evaluation period. A majority of the qualifying loans made as part of the SBA's Paycheck Protection Program (\$6.6 million) went to revitalize and stabilize LMI areas or designated disaster areas during the pandemic. The last two qualifying loans were made as part of the SBA's 504 Certified Development Company program and totaled \$3.1 million. These loans provided economic development of the AA. In total, CD loans represent 20.8 of tier 1 capital.

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

Qualified Investments											
Assessment Area	Р	rior Period*	Cı	ırrent Period		Т		Unfunded Commitments**			
	#	\$(000's)	#	\$(000's)	#	% of	\$(000's)	% of	#	\$(000's)	
						Total #		Total \$			
Indianapolis MSA AA	2 126		55 1,575		57	57 100.0 1,701 10		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.

During the evaluation period, the bank made three investments in municipal bonds totaling \$1.2 million. These bonds provided financing for affordable housing programs in the broader statewide area, including the bank's AA. In addition, the bank made 52 qualified donations totaling \$355,000. These donations benefitted 34 organizations that provide various community services or affordable housing to

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

LMI individuals or families within the AA. The bank also received credit for two prior period municipal bond investments with an outstanding book balance of \$126,000. These bonds provided financing for a library located in a low-income census tract that serves the entire community, including three moderate-income census tracts. Total qualified investments of \$1.7 million represent 3.6 percent of the tier 1 capital.

#### **Extent to Which the Bank Provides Community Development Services**

Within the AA, 11 employees provided CD services to nine different organizations that support affordable housing, revitalization efforts, financial literacy, homelessness, substance abuse, and youth programs. Each of these employees were involved in a leadership role as a director, officer, or committee member. One employee further volunteered by preparing taxes and providing extensive consulting to organizations regarding the Federal Home Loan Bank of Indiana's affordable housing and small business grant programs. In addition, several employees volunteer as project managers for task forces of a community coalition. This coalition was initiated by the bank's former CEO to address the housing, mental health, and transportation issues that arose during the COVID-19 pandemic.

# Appendix A: Scope of Examination

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

Time Period Reviewed:	January 1, 2019 - Decemb	er 31, 2021								
Bank Products Reviewed:	Home Mortgage, communi development services	Home Mortgage, community development loans, qualified investments, community development services								
Affiliate(s)	Affiliate Relationship	Products Reviewed								
No affiliate products reviewed	n/a	n/a								
List of Assessment Areas and Typ	pe of Examination									
Rating and Assessment Areas	Type of Exam	Other Information								
States										
Indiana – Indianapolis MSA	Full-scope	Portion of Indianapolis-Carmel-Anderson MSA #26900: All of Morgan County and Hendricks County and the northern portion of Johnson County								

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

RATINGS: Home Bank Savings Bank											
Overall Bank:	Lending Test Rating										
Home Bank Savings Bank	Outstanding										
State:											
Indiana	Outstanding										

# **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 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

**Limited-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

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

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

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

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

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

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

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

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

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 are treated as originations; and (2) "aggregate" is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/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 O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

2019-21

	Total Home Mortgage Low-Income Tracts Loans			Moderate-Income Tracts			Middle-Income Tracts			Upper-	Income	Tracts	Not Available-Income Tracts								
Assessment Area:	#	\$		Overall Market				% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units			% of Owner- Occupied Housing Units			% of Owner- Occupied Housing Units				
Indianapolis MSA	987	181,634	100.0	29,928	0.7	4.0	0.6	7.6	13.9	6.3	42.6	47.5	37.9	49.0	34.7	55.2	0.0	0.0	0.0		
Total	987	181,634	100.0	29,928	0.7	4.0	0.6	7.6	13.9	6.3	42.6	47.5	37.9	49.0	34.7	55.2	0.0	0.0	0.0		

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

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

2019-21

	Total Home Mortgage Loans				Low-Ind	come Bo	orrowers	Moderate-Income Borrowers			Middle-Income Borrowers			Upper-In	icome E	Borrowers	Not Available-Income Borrowers		
Assessment Area:	#	*		Overall Market	Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Indianapolis MSA	987	181,634	100.0	29,928	14.4	9.5	6.2	16.6	20.5	18.6	22.1	28.3	22.1	46.9	37.8	32.7	0.0	4.0	20.4
Total	987	181,634	100.0	29,928	14.4	9.5	6.2	16.6	20.5	18.6	22.1	28.3	22.1	46.9	37.8	32.7	0.0	4.0	20.4

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%