



Office of the  
Comptroller of the Currency  
Washington, DC 20219

# INTERMEDIATE SMALL BANK

## PUBLIC DISCLOSURE

June 12, 2023

## COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Greenville National Bank  
Charter Number: 13944

446 South Broadway  
Greenville, OH 45331

Office of the Comptroller of the Currency

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

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

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## Overall CRA Rating

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

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

**The Community Development Test is rated: Outstanding.**

The major factors that support this rating include:

- The Lending Test rating is based on the state ratings and the following overall conclusions:
  - The bank's loan-to-deposit (LTD) ratio is reasonable.
  - A majority of the bank's loans are inside its assessment areas (AAs).
  - The bank exhibits reasonable geographic distribution of loans in the AAs.
  - The bank exhibits a reasonable distribution of loans to individuals of different income levels in the AAs.
- The Community Development (CD) Test rating is based on the state ratings. The bank's level of CD lending represents excellent responsiveness to CD needs, considering the bank's capacity and the need and availability of such opportunities for CD in the AAs. The Office of the Comptroller of the Currency (OCC) placed more weight on CD lending given the opportunities for CD during the recent pandemic.

### Loan-to-Deposit Ratio

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

Over the eight quarters since the previous Community Reinvestment Act (CRA) evaluation (January 2020 – December 2021), Greenville National Bank's (GNB or bank) quarterly average LTD ratio is 69.5 percent. The ratio ranged from a high of 81.9 percent as of March 31, 2020, to a low of 60.5 percent as of December 31, 2021. GNB's average LTD ratio is commensurate with similarly situated banks in the institution's three AAs, with total assets ranging from \$200 million to \$800 million. These similarly situated banks have an average LTD ratio of 77.3 percent ranging from a high of 86.8 percent to a low of 60.3 percent. The custom peer group consisted of other community banks located within GNB's three AAs including three banks headquartered in Darke County (OH), one bank headquartered in Henry County (IN), and one bank headquartered in Wayne County (IN).

GNB's LTD ratios have been trending down during the COVID-19 pandemic due to deposit growth largely outpacing loan growth. Between January 1, 2020, and December 31, 2021, the bank's net loans and leases decreased 9.3 percent from \$340.1 million to \$308.4 million. Over the same period, the bank's total deposits increased 27.1 percent from \$401.2 million to \$509.9 million. GNB's trend of increasing deposits reasonably coincides with the surge in deposits many financial institutions experienced during and following the height of the COVID-19 pandemic, largely stemming from pandemic-related government stimulus.

## Lending in Assessment Area

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

The bank originated and purchased 77 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.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total  #	Dollar Amount of Loans \$(000s)				Total  \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	646	77.6	187	22.4	833	110,179	72.9	41,034	27.1	151,213
Consumer	26	65.0	14	35.0	40	487	67.7	232	32.3	719
Total	672	77.0	201	23.0	873	110,666	72.8	41,266	27.2	151,932
Source: Bank Data; 2020 and 2021 Home Mortgage Disclosure Act (HMDA) data. Due to rounding, totals may not equal 100.0%.										

## Description of Institution

GNB is a wholly owned subsidiary of Greenville National Bancorp, a one-bank holding company headquartered in Greenville, Ohio. GNB is a traditional full-service community bank and offers a wide array of banking products. GNB's primary business is making residential mortgage and consumer loans. However, the bank also originates business and agricultural loans. GNB sells home mortgage loans on the secondary market to the Federal Home Loan Bank (FHLB), with approximately \$87.7 million sold in 2020 and 2021. Other financial products and services include deposit accounts (checking, savings, certificates of deposit, and individual retirement accounts), safe deposit boxes, wire transfers, and e-banking (online and mobile banking). There was no merger or acquisition activity that affected the scope of the bank's operations during the evaluation period.

As of December 31, 2021, GNB had total assets of \$589.2 million, with \$56.8 million in tier 1 capital. Total deposits equaled \$509.9 million or 86.5 percent of total assets, while net loans and leases of \$308.4 million represented 52.3 percent of total assets. The loan portfolio composition and lending activity reflects GNB's continued focus on residential real estate and consumer lending. As of the December 31, 2021, Consolidated Report of Condition and Income (Call Report), the bank's loan portfolio is comprised of approximately 36.8 percent home mortgage loans, 28.2 percent business loans (commercial real estate and commercial and industrial loans), 20.8 percent agriculture loans, and 14.2 percent consumer loans. The bank's loan originations, based on the number of loans originated during the evaluation period, are 13.5 percent home mortgage, 15.2 percent business, 9.6 percent agriculture, and 61.7 percent consumer loans. The bank's loan originations, based on the dollar amount of loans originated during the evaluation period, are 27.5 percent home mortgage, 39.3 percent business, 16.9 percent agriculture, and 16.3 percent consumer loans. The bank supplied loan production reports demonstrate that on a per unit basis, consumer loans reflect a substantial amount of recent loan origination activity.

GNB is a multistate bank with ten full-service banking offices: seven in Darke County, Ohio, two in Miami County, Ohio, and one in Randolph County, Indiana. Seven of the ten branches also have automated teller machines (ATM's). Three banking offices in Darke County and the consumer loan

production office are in moderate-income census tracts (CTs), with the remaining offices in middle-income CTs. GNB has two rating areas (Ohio and Indiana) and three AAs. Darke County, in its entirety, is included in the bank's Ohio non-metropolitan statistical area (Ohio Non-MSA AA). The second AA includes 16 CTs in western and central Miami County, Ohio in the Dayton, Ohio MSA 19430. The third AA is in Indiana and includes four CTs in east and southwest Randolph County, two CTs in northwest Wayne County, and one CT in northeast Henry County. The AAs are contiguous, meet the requirements of the CRA regulation, and do not reflect illegal discrimination or arbitrarily exclude any low- and moderate-income (LMI) areas. No offices have been opened or closed since the prior CRA evaluation. Refer to the "Description of Institution's Operations in Ohio" and "Description of Institution's Operations in Indiana" sections for more details on the branches and AAs.

The COVID-19 pandemic in 2020 impacted the local economy, including unemployment data. The Small Business Administration's (SBA) Paycheck Protection Program (PPP) provided loans to help businesses keep their workforces employed during the pandemic. The bank was particularly responsive to the SBA's PPP and originated a significant volume of PPP loans in 2020 and 2021. In 2020, the bank originated 276 SBA PPP loans totaling \$17.8 million. In 2021, the bank originated 438 SBA PPP loans totaling \$12.5 million. Of the 438 loans originated in 2021, only one loan was made outside Ohio or Indiana. Refer to the Lending Test (CD Lending) for additional information on the qualified CD PPP loans made in 2021.

GNB's lending activities are consistent with its size, expertise, financial capability, and local economic conditions. There are no legal, financial, or other factors that affect its ability to help meet the credit needs of its AAs. GNB received a Satisfactory rating for its CRA performance during the prior evaluation period. This rating was reported in the OCC's CRA Performance Evaluation dated March 30, 2020.

## **Scope of the Evaluation**

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

The OCC conducted a CRA performance evaluation to assess the bank's record of meeting the credit and CD needs of its entire community, including LMI areas. The OCC used intermediate small bank CRA evaluation procedures to assess the bank's performance under the Lending and CD Tests. The evaluation period was from January 1, 2020, to December 31, 2021. The OCC did not include 2022 data in this analysis because the 2022 aggregate Home Mortgage Disclosure Act (HMDA) data was not available.

The OCC evaluated the bank's lending performance based on its primary lending products, home mortgage and consumer lending. While the bank offers other lending products, these products were not primary products during the evaluation period. As a result, the OCC did not consider these as part of the performance evaluation, as an analysis of this data would not be meaningful. GNB's primary lending products are discussed under the "Description of Institution" section in this report. For the Lending Test, the OCC evaluated all home mortgage loans reported under the HMDA for 2020 and 2021. For the consumer loans, the OCC transaction tested 20 loans per year for the Lending in the AA analysis. For the geographic and borrower income distribution analyses, the OCC transaction tested 20 loans per year per AA. The OCC relied on internal bank reports for the transaction testing of consumer loans during the evaluation period.

For analysis purposes, the OCC compared the bank's lending performance with demographic data from the 2015 American Community Survey (ACS) U.S. Census data. No affiliate activity was included in this analysis. Refer to the table in appendix A, Scope of the Examination, for more information on the scope of the review.

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

In each state where the bank has an office, one or more of 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), 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.

GNB has three AAs as described above under the "Description of Institution" section. The OCC completed a full-scope review for each AA. A description of each AA is also provided in the "Description of Institution's Operations in Ohio" and "Description of Institution's Operations in Indiana" sections of this evaluation.

### **Ratings**

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings. GNB operates in two states (Ohio and Indiana). All the bank's offices are in Ohio and Indiana, so its overall rating is based on performance in these two states. The State of Ohio rating is based on performance in the Ohio Non-MSA AA and Dayton MSA AA. The State of Indiana rating is based on performance in the Indiana Non-MSA AA.

GNB is a multistate bank with ten full-service banking offices. There are seven offices in Darke County, Ohio, two in Miami County, Ohio, and one in Randolph County, Indiana. Since nine of the ten offices and a large majority (98 percent) of the bank's deposits as of June 30, 2021, are attributed to Ohio, performance in Ohio was given much greater weight than performance in Indiana.

Refer to the "Scope" section under the state ratings 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 Consumer Financial Protection Bureau, as applicable.

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

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

## State Rating

### State of Ohio

**CRA rating for the State of Ohio<sup>1</sup>:** Satisfactory.

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

**The Community Development Test is rated:** Outstanding.

The major factors that support this rating include:

- GNB exhibits reasonable geographic distribution of loans in the AAs.
- GNB exhibits a reasonable distribution of loans to individuals of different income levels in the AAs.
- The bank has not received any complaints about its performance in helping to meet the AAs' credit needs during the evaluation period.
- The bank's responsiveness to CD needs of the AAs through CD lending is overall excellent.

### Description of Institution's Operations in Ohio

GNB has designated two AAs in Ohio, the Ohio Non-MSA AA and the Dayton MSA AA. The bank selected the AAs based on their targeted lending area and office locations. The AAs are contiguous, meet the requirements of the regulation, and do not reflect illegal discrimination, nor do they arbitrarily exclude LMI areas.

#### Ohio Non-MSA AA

During the evaluation period, the Ohio Non-MSA AA includes Darke County, Ohio, in its entirety. Three offices (Main Banking Center, Sycamore Banking Center, and Chestnut Banking Center) are in moderate-income CTs in Greenville, Ohio, with the remaining offices in middle-income CTs. The Consumer Loan Center is also located in Darke County in a moderate-income CT. Four of the seven offices have an ATM with one in a moderate-income CT (Sycamore Banking Center).

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 GNB's operations in Ohio. The table below provides a summary of demographic data for the AA.

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<sup>1</sup> This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.



Demographic Information of the Assessment Area						
Assessment Area: Ohio Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	12	0.0	16.7	66.7	16.7	0.0
Population by Geography	52,356	0.0	15.2	70.7	14.1	0.0
Housing Units by Geography	22,723	0.0	16.5	70.9	12.6	0.0
Owner-Occupied Units by Geography	15,053	0.0	11.4	74.4	14.2	0.0
Occupied Rental Units by Geography	5,812	0.0	28.6	63.0	8.4	0.0
Vacant Units by Geography	1,858	0.0	19.7	67.7	12.6	0.0
Businesses by Geography	2,890	0.0	21.3	62.5	16.2	0.0
Farms by Geography	438	0.0	2.5	82.4	15.1	0.0
Family Distribution by Income Level	14,154	21.2	17.5	24.1	37.3	0.0
Household Distribution by Income Level	20,865	22.4	18.3	19.5	39.8	0.0
Median Family Income Non-MSAs - OH		\$55,785	Median Housing Value			\$110,158
Median Household Income Non-MSAs – OH		\$44,764	Median Gross Rent			\$610
			Families Below Poverty Level			9.9%
			Households Below Poverty Level			12.2%
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.						

### Demographic Data

As of the 2015 ACS U.S. Census data in the table above, the population of the Ohio Non-MSA AA is 52,356, with 15.2 percent of the population living in moderate-income CTs, 70.7 percent in middle-income CTs, and 14.1 percent in upper-income CTs. As of the 2015 ACS U.S. Census, the AA consists of 12 CTs, and is comprised of two moderate-income, eight middle-income, and two upper-income CTs. The AA includes 14,154 families and 20,865 households. There were no CT classification changes or distressed or underserved CTs in the AA during the evaluation period.

### Affordable Housing Cost

According to the 2015 ACS U.S. Census data, the median housing value is \$110,158. With the median family income of \$55,785, moderate-income families make less than \$44,628 annually and low-income families make less than \$27,893 annually. Median housing values are 2.5 times the annual income of moderate-income families and 4 times the annual income of low-income families. Thus, the cost of housing may create a significant financial barrier to homeownership among these families. The 2015 ACS U.S. Census data shows that there are 22,723 total housing units in the Ohio Non-MSA AA, of which 66.2 percent are owner-occupied, 25.6 percent are rental occupied, and 8.2 percent are vacant units. The median age of housing stock is approximately 65 years. The cost of homeownership in older housing stock is typically higher than in newer housing; thus, the median age of housing in moderate-income geographies is also a significant barrier to mortgage lending in those CTs. Additionally, 9.9 percent of the families and 12.2 percent of the households live below the poverty level, making it

especially difficult for this segment of the population to afford and maintain a home or qualify for a loan.

### Job Market and Economic Conditions

The economic conditions in the Ohio Non-MSA AA have improved since the start of the COVID-19 pandemic and are overall stable. The unemployment rate in Darke County and the state and national unemployment rates experienced a spike in unemployment during April and May of 2020 followed by a gradual recovery through the end of 2021. By the fourth quarter of 2021, the unemployment rates reached their lowest point since the beginning of COVID-19. According to the U.S. Bureau of Labor Statistics as of December 2021, the “not seasonally adjusted” unemployment rate was 3 percent in Darke County, which is reasonable when compared with the State of Ohio unemployment rate of 3.5 percent and the national unemployment rate of 3.7 percent for the same period.

<b>Average Annual Unemployment Rates</b>			
	Average 2020	Average 2021	December 2021
Darke County	6.8	3.9	3.0
State of Ohio	8.2	5.1	3.5
United States	8.1	5.4	3.7

*Source: U.S. Bureau of Labor Statistics (not seasonally adjusted).*

According to business demographic data from D&B (2021), the primary industries in the AA are services, retail trade, and agriculture, forestry, and fishing. Primary employers in the AA include Whirlpool Corporation, Midmark Corporation, and Greenville Technology.

### Competition

Competition for deposits in the AA is strong given the number and size of financial institutions in the AA. Competition is comprised of local community banks, credit unions, and branches of larger financial institutions. According to the June 30, 2021, Deposit Market Share Report from the Federal Deposit Insurance Corporation (FDIC), 12 financial institutions with 25 offices operated in Darke County. GNB held the largest deposit market share at 28.6 percent as of June 30, 2021, with \$437 million in total deposits. This represents 89.6 percent of GNB’s total deposits. The bank’s primary competitors include financial institutions with significant deposit activity in the AA such as Park National Bank, Greenville Federal, Osgood State Bank, and Farmers State Bank, with these four holding a 49.7 percent deposit market share.

Strong competition for home mortgage loans also exists. As stated above, GNB’s primary business focus includes home mortgage lending. GNB ranked 3<sup>rd</sup> out of 132 lenders in Darke County in residential home mortgage volume based on 2021 Peer Mortgage Data and 2015 ACS U.S. Census data. GNB had 10.2 percent of the lending market share, based on the number of loans, as of the 2021 Peer Mortgage Data Report, lending \$26.1 million (173 loans). Top mortgage lenders in the AA included Caliber Home Loans, Inc. and Park National Bank, with a combined market share of 26.7 percent.

### Community Contact/Credit Needs

As part of the CRA performance evaluation, the OCC reviewed information provided from one interview with a representative from an economic development organization. The contact stated that “workforce” affordable housing at market rates is a need in the community. This contact stated there is a need for more housing at affordable market rates that would be affordable to most in the area. The contact also discussed small business lending as a credit need in the community. In general, local financial institutions are adequately meeting the credit and CD needs of the community.

Dayton MSA AA

During the evaluation period, the Dayton MSA AA includes 16 CTs in western and central Miami County, Ohio in the Dayton, OH MSA 19430. There are two branches in this AA, and both are in middle-income CTs. Both branches have an ATM.

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 GNB's operations in Ohio. The table below provides a summary of demographic data for the AA.

Demographic Information of the Assessment Area						
Assessment Area: Dayton MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	16	0.0	18.8	68.8	12.5	0.0
Population by Geography	76,659	0.0	20.4	67.2	12.4	0.0
Housing Units by Geography	33,330	0.0	20.6	68.2	11.2	0.0
Owner-Occupied Units by Geography	20,908	0.0	19.0	66.8	14.2	0.0
Occupied Rental Units by Geography	9,943	0.0	23.8	70.5	5.7	0.0
Vacant Units by Geography	2,479	0.0	21.2	70.3	8.5	0.0
Businesses by Geography	4,411	0.0	16.6	72.3	11.1	0.0
Farms by Geography	253	0.0	11.5	79.8	8.7	0.0
Family Distribution by Income Level	20,711	21.4	18.3	22.4	37.9	0.0
Household Distribution by Income Level	30,851	22.6	17.4	18.1	41.9	0.0
Median Family Income MSA - 19430 Dayton-Kettering, OH MSA		\$61,957	Median Housing Value			\$127,134
Median Household Income MSA – 19430 Dayton-Kettering, OH MSA		\$48,789	Median Gross Rent			\$722
			Families Below Poverty Level			11.5%
			Households Below Poverty Level			13.5%
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.						

Demographic Data

As of the 2015 ACS U.S. Census data in the table above, the population of the Dayton MSA AA is 76,659, with 20.4 percent of the population living in moderate-income CTs, 67.2 percent in middle-income CTs, and 12.4 percent in upper-income CTs. As of the 2015 ACS U.S. Census, the AA consists of 16 CTs, and is comprised of three moderate-income, 11 middle-income, and two upper-income CTs. The AA includes 20,711 families and 30,851 households. There were no CT classification changes during the evaluation period.

Affordable Housing Cost

According to the 2015 ACS U.S. Census data, the median housing value is \$127,134. With the median family income of \$61,957, moderate-income families make less than \$49,566 annually and low-income

families make less than \$30,979 annually. Median housing values are 2.6 times the annual income of moderate-income families and 4.1 times the annual income of low-income families. Thus, the cost of housing may create a significant financial barrier to homeownership among these families. The 2015 ACS U.S. Census data shows that there are 33,330 total housing units in the Dayton MSA AA, of which 62.7 percent are owner-occupied, 29.8 percent are rental occupied, and 7.5 percent are vacant units. The median age of housing stock is approximately 59 years. The cost of homeownership in older housing stock is typically higher than in newer housing; thus, the median age of housing in moderate-income geographies is also a significant barrier to mortgage lending in those CTs. Additionally, 11.5 percent of the families and 13.5 percent of the households live below the poverty level, making it especially difficult for this segment of the population to afford and maintain a home or qualify for a loan.

### Job Market and Economic Conditions

The economic conditions in the Dayton MSA AA have improved since the start of the COVID-19 pandemic and are overall stable. The unemployment rate in Miami County and the state and national unemployment rates experienced a spike in unemployment during April and May of 2020 followed by a gradual recovery through the end of 2021. By the fourth quarter of 2021, the unemployment rates reached their lowest point since the beginning of COVID-19. According to the U.S. Bureau of Labor Statistics as of December 2021, the “not seasonally adjusted” unemployment rate was 3.1 percent in Miami County, which is reasonable when compared with the State of Ohio and national unemployment rates for the same period.

<b>Average Annual Unemployment Rates</b>			
	Average 2020	Average 2021	December 2021
Miami County	7.1	4.3	3.1
State of Ohio	8.2	5.1	3.5
United States	8.1	5.4	3.7
<i>Source: U.S. Bureau of Labor Statistics (not seasonally adjusted).</i>			

According to business demographic data from D&B (2021), the primary industries in the AA are services and retail trade. Primary employers in the AA include Upper Valley Medical Center, Clopay Building Products, and F&P America.

### Competition

Competition for deposits in the AA is strong given the number and size of financial institutions in the AA. Competition is comprised of local community banks, credit unions, and branches of larger financial institutions. According to the June 30, 2021, Deposit Market Share Report from the FDIC, 15 financial institutions with 32 offices operated in Miami County. GNB held the 12<sup>th</sup> largest deposit market share at 2 percent as of June 30, 2021, with \$40.7 million in total deposits. This represents 8.3 percent of GNB’s total deposits. The bank’s primary competitors include financial institutions with significant deposit activity in the AA such as Fifth Third Bank, National Association (N.A.), JPMorgan Chase Bank, N.A., U.S. Bank, N.A., Park National Bank, and First Financial Bank, with these five holding a 72.2 percent deposit market share.

Strong competition for home mortgage loans also exists. As stated above, GNB’s primary business focus includes home mortgage lending. GNB ranked 19<sup>th</sup> out of 212 lenders in the Dayton MSA AA (Miami County) in residential home mortgage volume based on 2021 Peer Mortgage Data and 2015 ACS U.S. Census data. GNB had 1.2 percent of the lending market share, based on the number of loans, as of the 2021 Peer Mortgage Data Report, lending \$11.1 million (51 loans). Top mortgage lenders in the AA

include Union Savings Bank, Fifth Third Bank, N.A., and Wright-Patt Credit Union, Inc., with a combined market share of 27.4 percent.

### Community Contact/Credit Needs

As part of the CRA performance evaluation, the OCC reviewed information provided from two interviews with representatives from an affordable housing and economic development organization. The contacts stated that general credit needs include affordable housing, small dollar mortgage products, down payment assistance, and access to capital for small businesses. In general, local financial institutions are adequately meeting the credit and CD needs of the community.

## **Scope of Evaluation in Ohio**

The OCC performed a full-scope review of the Ohio Non-MSA AA and the Dayton MSA AA. The data in the AAs were analyzed and presented as two AAs for the purposes of this evaluation. Home mortgage and consumer lending are the bank's primary lending products and were evaluated under the Lending Test. As discussed above, the OCC used HMDA data for 2020 and 2021 for the home mortgage loan analysis and transaction tested 20 consumer loans per year per AA. The OCC reviewed CD loans, investments, and services for 2020 and 2021.

The rating is based on performance in both AAs. However, the Ohio Non-MSA AA (Darke County) has seven of the bank's nine Ohio deposit-taking offices, or 77.8 percent. Those seven offices account for 91.5 percent of the total deposits in Ohio as of June 30, 2021. As of the 2020 and 2021 home mortgage loans inside the Ohio AAs, 74.3 percent were in the Ohio Non-MSA AA and 25.7 percent in the Dayton MSA AA. Given the above information, the OCC placed more weight on the Ohio Non-MSA AA. Home mortgage and consumer loans were given equal weight. The bank makes more consumer loans than mortgage loans, but the average consumer loan is much smaller in dollar amount than the average mortgage loan. Further, mortgage loans are generally considered more impactful to consumers.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO**

### **LENDING TEST**

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

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

Based on full-scope reviews, the bank's lending performance in the State of Ohio (Ohio Non-MSA AA and Dayton MSA AA) is reasonable.

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

The bank exhibits reasonable geographic distribution of loans in the state.

### ***Home Mortgage Loans***

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

The OCC compared the percentage of home mortgage loans originated or purchased by the bank to the percentage of owner-occupied housing units (demographic data) in the four geographic income categories, placing emphasis on the LMI geographies. The OCC also compared the bank's performance against the percentage of home mortgage loans of other mortgage lenders (aggregate data) in the AA, as demonstrated by HMDA aggregate data.

In determining the rating, the OCC weighed demographic factors of the AA that could affect the bank's ability to lend. These factors include competition from other financial institutions, the number of LMI geographies, branch presence, area demographics, and the location of most owner-occupied housing.

#### Ohio Non-MSA AA

The bank exhibits an overall reasonable geographic distribution of home mortgage loans within the Ohio Non-MSA AA. The AA consists of two moderate-income CTs, eight middle income CTs, and two upper income CTs. During the evaluation period, the percentage of home mortgage loans originated by the bank in moderate income CTs is below both the demographic comparator and aggregate lending data of other HMDA reporters. There are no low-income CTs in the AA.

The OCC considered other factors contributing to limited lending opportunities within the moderate-income CTs, which include strong competition from other financial institutions with offices located in the moderate-income CTs. Three of the seven GNB offices in the Ohio Non-MSA AA are in moderate-income CTs. Based on 2021 figures, there is a relatively low volume of housing units within the moderate-income tracts (3,743), as well as a moderate poverty rate (based on families below poverty) of 9.9 percent overall and modest vacancy rate in the AA (8.2 percent). Approximately 25.6 percent of the housing units are rental occupied. The median age of housing stock within the AA is 65 years. This may present an additional barrier to lending, given the cost of homeownership in older housing is typically higher than newer housing. Competition for loans is strong due to the volume of financial institutions in the AA. The top two financial institutions in home mortgage lending account for 26.7 percent of the home mortgage market share as of the 2021 Peer Mortgage Data report, with GNB ranking third with 10.2 percent of the lending market share. These performance context factors provide further support for the bank's lending in moderate-income tracts.

#### Dayton MSA AA

The bank exhibits an overall reasonable geographic distribution of home mortgage loans within the Dayton MSA AA. The AA consists of three moderate-income CTs, eleven middle-income CTs, and two upper-income CTs. During the evaluation period, the percentage of home mortgage loans originated by the bank in moderate income CTs is below both the demographic comparator and aggregate lending data of other HMDA reporters. There are no low-income CTs in the AA.

The OCC considered other factors contributing to limited lending opportunities within the moderate-income CTs, which include strong competition from other financial institutions with offices located in the moderate-income CTs. Additionally, GNB's two locations in the Dayton MSA AA are in middle-income CTs and not near the moderate-income CTs. Based on 2021 figures, there is a relatively low volume of housing units within the moderate-income tracts (6,865), as well as a moderate poverty rate (based on families below poverty) of 11.5 percent overall and modest vacancy rate in the AA (7.4 percent). Approximately 29.8 percent of the housing units are rental occupied. The median age of housing stock within the AA is 59 years. This may present an additional barrier to lending, given the cost of homeownership in older housing is typically higher than newer housing. Competition for loans is strong due to the volume of financial institutions in the AA. The top five financial institutions in home mortgage lending account for 37.3 percent of the home mortgage market share as of the 2021 Peer

Mortgage Data report, with GNB ranking 19<sup>th</sup> out of 212 lenders with 1.2 percent of the lending market share. The top five financial institutions are larger than GNB. These performance context factors provide further support for the bank's lending in LMI tracts.

### ***Consumer Loans***

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

The OCC compared the percentage of consumer loans originated or purchased by the bank to the percentage of households (demographic data) in the four geographic income categories, placing emphasis on the LMI geographies. As consumer loans are not subject to reporting requirements, no comparison to peer (aggregate) lending data was available.

#### **Ohio Non-MSA AA**

The bank exhibits an excellent distribution of consumer loans within the Ohio Non-MSA AA. During the evaluation period, the percentage of consumer loans originated or purchased by the bank in moderate-income CTs exceeds demographic data. There are no low-income CTs in the AA.

#### **Dayton MSA AA**

The bank exhibits a reasonable distribution of consumer loans within the Dayton MSA AA. During the evaluation period, the percentage of consumer loans originated or purchased by the bank in moderate-income CTs is commensurate with demographic data. There are no low-income CTs in the AA.

### ***Lending Gap Analysis***

The OCC did not identify any unexplained, conspicuous gaps in the lending distribution during the review of bank reports and maps.

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

The bank exhibits a reasonable distribution of loans to individuals of different income levels, given the product lines offered by the bank.

### ***Home Mortgage Loans***

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

The OCC compared the percentage of home mortgage loans originated or purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level (demographic data), placing emphasis on lending to LMI families. The OCC also compared the bank's performance against home mortgage loans of other home mortgage lenders (aggregate data), as demonstrated by HMDA aggregate data.

Ohio Non-MSA AA

The bank exhibits an overall reasonable distribution of home mortgage loans among borrowers of different income levels within the Ohio Non-MSA AA. GNB's percentage of home mortgage loans to low-income borrowers is below both demographic and aggregate data. GNB's percentage of home mortgage loans to moderate-income borrowers exceeds demographic data and is below aggregate data.

The OCC considered other factors in the bank's performance during the evaluation period, including the cost of homeownership in the AA as an obstacle to home ownership for LMI borrowers. As stated above, overall median housing values are 4 times the weighted average of the median family income of low-income families in the AA. This obstacle may result in fewer opportunities to originate mortgage loans to low-income families. Approximately 9.9 percent of the families live below the poverty level. Additionally, there is strong competition for loans in the Ohio Non-MSA AA. As stated above, GNB's home mortgage market share of 10.2 percent as of the 2021 Peer Mortgage Data ranks them 3<sup>rd</sup> out of 132 lenders in the Ohio Non-MSA AA, with the top two lenders accounting for about 26.7 percent of the market share.

Dayton MSA AA

The bank exhibits an overall reasonable distribution of home mortgage loans among borrowers of different income levels within the Dayton MSA AA. GNB's percentage of home mortgage loans to low-income borrowers is below both demographic and aggregate data. GNB's percentage of home mortgage loans to moderate-income borrowers exceeds demographic data and is below aggregate data.

The OCC considered other factors in the bank's performance during the evaluation period, including the cost of homeownership in the AA as an obstacle to home ownership for LMI borrowers. As stated above, overall median housing values are 4.1 times the weighted average of the median family income of low-income families in the AA. This obstacle may result in fewer opportunities to originate mortgage loans to low-income families. Approximately 11.5 percent of the families live below the poverty level. Additionally, there is strong competition for loans in the Dayton MSA AA. As stated above, GNB's home mortgage market share of 1.2 percent as of the 2021 Peer Mortgage Data ranks them 19<sup>th</sup> out of 212 lenders in the Dayton MSA AA, with the top five lenders accounting for about 37.3 percent of the market share.

***Consumer Loans***

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

The OCC compared the percentage of consumer loans originated or purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level (demographic data). As consumer loans are not subject to reporting requirements, no comparison to peer (aggregate) lending data was available.

Ohio Non-MSA AA

The bank exhibits an overall reasonable distribution of consumer loans among borrowers of different income levels within the Ohio Non-MSA AA. During the evaluation period, GNB's percentage of consumer loans to low-income borrowers is below demographic data; however, GNB's percentage of consumer loans to moderate-income borrowers exceeds demographic data. Approximately 12.2 percent of the households live below poverty, making it difficult for this segment of the population to qualify for a loan.



Dayton MSA AA

The bank exhibits an overall reasonable distribution of consumer loans among borrowers of different income levels within the Dayton MSA AA. During the evaluation period, GNB's percentage of consumer loans to low-income borrowers is well below demographic data. However, the OCC considered the AA's poverty rate of 13.5 percent of the households living below poverty as an obstacle to lending to low-income individuals. GNB's percentage of consumer loans to moderate-income borrowers slightly exceeds demographic data.

**Responses to Complaints**

GNB has not received any complaints about its performance in helping to meet the AAs' credit needs during the evaluation period.

**COMMUNITY DEVELOPMENT TEST**

The bank's performance under the Community Development Test in the State of Ohio is rated Outstanding.

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

Based on a full-scope review, the bank exhibits excellent responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AAs.

GNB was particularly responsive to the COVID-19 pandemic and its level of CD loans were highly impactful. The OCC placed more weight on CD lending, given the bank's excellent responsiveness to the COVID-19 crisis and volume of CD loans made in response to the COVID-19 pandemic. It was also noted that CD donations and services were impacted in 2020 and 2021 due to the COVID-19 pandemic.

GNB's participation in the SBA's PPP was particularly responsive to the credit needs of the businesses and enhanced the credit availability of this loan product. In 2021, GNB originated 351 SBA PPP loans in the Ohio Non-MSA AA totaling \$7.5 million and 34 SBA PPP loans in the Dayton MSA AA totaling \$1.4 million. Additionally, GNB originated 36 SBA PPP loans in the statewide/regional area of Ohio totaling \$3.4 million. The PPP loans originated in 2021 met the definition of CD as part of the 2020 OCC CRA Rule and the expanded CD definitions. However, loans made prior to October 1, 2020, were analyzed under the 1995 CRA Rule and only counted as CD loans if they had a primary purpose of CD as defined in that rule.

**Number and Amount of Community Development Loans**

The CD Loans Table, shown below, sets forth the information 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.

The number and dollar amount of qualified CD loans represent excellent responsiveness. During the evaluation period, GNB originated 399 qualified CD loans inside their AAs totaling \$15 million.

Additionally, the bank originated 38 CD loans in the statewide/regional area of Ohio, totaling \$5.6 million.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Ohio Non-MSA AA	359	82.2	8,825	42.8
Dayton MSA AA	40	9.1	6,177	30.0
Statewide/Regional Loans with Indirect Benefit	38	8.7	5,615	27.2
Total	437	100.0	20,617	100.0

#### Ohio Non-MSA AA

During the evaluation period, GNB originated 359 CD loans totaling \$8.8 million. This demonstrates excellent responsiveness. In 2021, GNB originated 351 SBA PPP loans totaling \$7.5 million to help businesses keep their workforces employed during the COVID-19 pandemic. The PPP loans particularly helped revitalize and stabilize LMI areas and promoted economic development in these areas. The PPP loans were innovative, flexible loan products, given the current COVID-19 crisis. The 2021 SBA PPP loans met the CD definition in place at the time of origination. The bank was particularly responsive to the community's needs in the Ohio Non-MSA AA with the origination of PPP loans.

Additionally, GNB originated eight CD loans totaling \$1.4 million to businesses that helped revitalize and stabilize moderate-income areas or provide CD services, including health care, to LMI individuals and families.

#### Dayton MSA AA

During the evaluation period, GNB originated 40 CD loans totaling \$6.2 million. This demonstrates excellent responsiveness. In 2021, GNB originated 34 SBA PPP loans totaling \$1.4 million to help businesses keep their workforces employed during the COVID-19 pandemic. The PPP loans particularly helped revitalize and stabilize LMI areas and promoted economic development in these areas. The PPP loans were innovative, flexible loan products, given the current COVID-19 crisis. The 2021 SBA PPP loans met the CD definition in place at the time of origination. The bank was particularly responsive to the community's needs in the Dayton MSA AA with the origination of PPP loans.

Additionally, GNB originated six CD loans totaling \$4.8 million to businesses or organizations that helped revitalize and stabilize moderate-income areas or provide CD services to LMI individuals and families, including SBA Certified Development Company/504 program loans.

#### Statewide/Regional Area of Ohio

GNB is responsive to the CD needs in its AAs so additional consideration was given to 38 CD loans in the greater regional area of Ohio. Thirty-six of the 38 loans were SBA PPP loans originated in Ohio and two were CD loans originated in Montgomery County, Ohio, to revitalize and stabilize moderate-income areas.

## Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Ohio Non-MSA AA	0	0	57	81.2	57	78.1	81.2	77.9	0	0
Dayton MSA AA	0	0	11	19.5	11	15.1	19.5	18.7	0	0
Statewide/Regional Investments with Indirect Benefit	0	0	5	3.6	5	6.8	3.6	3.4	0	0
Total	0	0	73	104.3	73	100.0	104.3	100.0	0	0

Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

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

The Qualified Investment Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified CD investments. The table includes all CD investments, including prior period investments that remain outstanding as of the evaluation date.

GNB's qualified CD investment activity represents adequate responsiveness. The bank made a total of 73 donations totaling approximately \$104,255 in 2020 and 2021, which equates to less than one percent of total tier one capital as of December 31, 2021. It was noted that donations were significantly impacted in 2021 due to the COVID pandemic. However, the bank contributed more donations during this two-year evaluation period when compared to the previous three-year evaluation period.

### Ohio Non-MSA AA

GNB's qualifying investments were primarily for grants for a variety of qualifying purposes, such as aid to needy children, general poverty relief, and economic development. See the above table for the number and dollar volume of investments/donations in the Ohio Non-MSA AA.

### Dayton MSA AA

GNB's qualifying investments were primarily for grants for a variety of qualifying purposes, such as aid to needy children, generally poverty relief, and economic development. See the above table for the number and dollar volume of investments/donations in the Dayton MSA AA.

### Statewide/Regional Area of Ohio

GNB is adequately responsive to the CD needs in its AAs so additional consideration was given to five CD donations in the greater regional area of Ohio.

## Extent to Which the Bank Provides Community Development Services

CD services provided by GNB represent adequate responsiveness to CD needs within the AAs. GNB's delivery systems are accessible to geographies and individuals of different income levels throughout the AAs. Impactful CD services were noted in the form of maintaining three banking offices in moderate-income areas of Greenville. Further, the bank's consumer lending office is also located in a

moderate-income CT. The maintenance of these offices serves to increase access to financial services to the entire community, including LMI residents. GNB compliments its traditional service delivery methods with certain alternative delivery channels, including online banking, mobile banking, and ATMs. It was noted that CD services were impacted in 2020 and 2021 due to the COVID-19 pandemic.

Other notable CD services include bank management serving in leadership roles such as president, treasurer, or board member of non-profit organizations such as housing authorities and economic development organizations. Further, financial literacy of LMI students is supported in the form of both presentations and donations of educational materials to teachers. During the evaluation period, GNB assisted four borrowers with obtaining down payment/closing costs assistance from the Federal Home Loan Bank's (FHLB) Welcome Home program. The bank assisted these borrowers with obtaining grants totaling \$22,500 from the FHLB Welcome Home program.

#### Ohio Non-MSA AA

Within this AA, approximately nine officers/employees provided CD services to at least 12 different organizations, with most on an annual basis. Of the services performed, all were in leadership roles by serving on the board or in a leadership capacity (president, treasurer, secretary, etc.). Bank officers and employees served the community by providing financial expertise to CD organizations that provide CD services to LMI individuals/families or business/economic development services. Additionally, one employee provided financial literacy (Checking Smarties presentation) to one local school in 2021.

#### Dayton MSA AA

Within this AA, at least one employee/officer provided CD services to one organization in both 2020 and 2021 as a board member. This bank representative provides financial expertise to an organization that provide CD services to LMI individuals or families.

## State Rating

### State of Indiana

**CRA rating for the State of Indiana<sup>2</sup>:** Satisfactory.

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

**The Community Development Test is rated:** Outstanding.

The major factors that support this rating include:

- GNB exhibits a reasonable geographic distribution of loans in its AA.
- GNB exhibits a reasonable distribution of loans to individuals of different income levels in the AA.
- The bank has not received any complaints about its performance in helping to meet the AA's credit needs during the evaluation period.
- The bank's responsiveness to CD needs of the AA through CD lending is overall excellent.

### Description of Institution's Operations in Indiana

GNB has designated one AA in Indiana, the Indiana Non-MSA AA. The bank selected the AA based on their targeted lending area and office location. The AA is contiguous, meets the requirements of the regulation, and does not reflect illegal discrimination, nor does it arbitrarily exclude LMI areas.

During the evaluation period, the Indiana Non-MSA AA included four CTs in east and southwest Randolph County (9514, 9516, 9520, and 9521), two CTs in northwest Wayne County (103 and 104), and one CT in northeast Henry County (9756). GNB has one branch, including an onsite ATM, in Losantville, Indiana. The branch is in a middle-income CT.

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

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<sup>2</sup> This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

Indiana Non-MSA AA

Demographic Information of the Assessment Area						
Assessment Area: Indiana Non-MSA AA						
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	23,743	0.0	15.9	84.1	0.0	0.0
Housing Units by Geography	10,432	0.0	17.7	82.3	0.0	0.0
Owner-Occupied Units by Geography	7,463	0.0	13.1	86.9	0.0	0.0
Occupied Rental Units by Geography	1,917	0.0	29.8	70.2	0.0	0.0
Vacant Units by Geography	1,052	0.0	28.1	71.9	0.0	0.0
Businesses by Geography	1,413	0.0	20.5	79.5	0.0	0.0
Farms by Geography	236	0.0	2.1	97.9	0.0	0.0
Family Distribution by Income Level	6,627	18.2	21.3	22.2	38.3	0.0
Household Distribution by Income Level	9,380	22.2	18.3	19.7	39.8	0.0
Median Family Income Non-MSAs - IN		\$55,715	Median Housing Value			\$92,300
Median Household Income – Non-MSAs - IN		\$44,878	Median Gross Rent			\$593
			Families Below Poverty Level			10.0%
			Households Below Poverty Level			13.5%
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.						

Demographic Data

As of the 2015 ACS U.S. Census data in the table above, the population of the Indiana Non-MSA AA is 23,743, with 15.9 percent of the population living in moderate-income CTs and 84.1 percent in middle-income CTs. As of the 2015 ACS U.S. Census, the AA consists of seven CTs, and is comprised of one moderate-income and six middle-income CTs. The AA includes 6,627 families and 9,380 households. There were no CT classification changes and no distressed or underserved CTs in the AA during the evaluation period.

Affordable Housing Cost

According to the 2015 ACS U.S. Census data, the median housing value is \$92,300. With the median family income of \$55,715, moderate-income families make less than \$44,572 annually and low-income families make less than \$27,858 annually. Median housing values are 2.1 times the annual income of moderate-income families and 3.3 times the annual income of low-income families. Thus, the cost of housing may create a significant financial barrier to homeownership among these families. The 2015 ACS U.S. Census data shows that there are 10,432 total housing units in the Indiana Non-MSA AA, of which 71.5 percent are owner-occupied, 18.4 percent are rental occupied, and 10.1 percent are vacant units. The median age of housing stock is approximately 65 years. The cost of homeownership in older housing stock is typically higher than in newer housing; thus, the median age of housing in moderate-income geographies is also a significant barrier to mortgage lending in those CTs. Additionally, 10 percent of the families and 13.5 percent of the households live below the poverty level, making it

especially difficult for this segment of the population to afford and maintain a home or qualify for a loan.

### Job Market and Economic Conditions

The economic conditions in the Indiana Non-MSA AA have improved since the start of the COVID-19 pandemic and are overall stable. The unemployment rates in Henry, Randolph, and Wayne Counties and the state and national unemployment rates experienced a spike in unemployment during April and May of 2020 followed by a gradual recovery through the end of 2021. By the fourth quarter of 2021, the unemployment rates reached their lowest point since the beginning of COVID-19. According to the U.S. Bureau of Labor Statistics as of December 2021, the “not seasonally adjusted” unemployment rates were 2.6 percent in Henry County, 2.1 percent in Randolph County, and 2.6 percent in Wayne County, which are reasonable when compared with the State of Indiana and national unemployment rates for the same period.

<b>Average Annual Unemployment Rates</b>			
	Average 2020	Average 2021	December 2021
Henry County	6.7	3.6	2.6
Randolph County	6.7	3.3	2.1
Wayne County	6.9	3.9	2.6
State of Indiana	7.3	3.9	2.5
United States	8.1	5.4	3.7

*Source: U.S. Bureau of Labor Statistics (not seasonally adjusted).*

According to business demographic data from D&B (2021), the primary industries in the AA are services, retail trade, and agriculture, forestry, and fishing. Primary employers in Henry County include Draper Inc. and Lifeline Personal Response. Primary employers in Randolph County include Anchor Glass and Randolph Central School Corporation. Primary employers in Wayne County include Reid Health and Reid Home.

### Competition

Competition for deposits in the AA is strong given the number and size of financial institutions in the AA. Competition is comprised of local community banks, credit unions, and branches of larger financial institutions. According to the June 30, 2021, Deposit Market Share Report from the FDIC, 14 financial institutions with 38 offices operated in Henry, Randolph, and Wayne Counties. GNB held the 13<sup>th</sup> largest deposit market share at 0.3 percent as of June 30, 2021, with \$3.1 million in total deposits. This represents approximately 2.1 percent of the bank’s total deposits. The bank’s primary competitors include financial institutions with significant deposit activity in the AA such as Merchants Bank of Indiana, First Bank Richmond, Citizens State Bank of New Castle Indiana, First Merchants Bank, and U.S. Bank, N.A, with these five holding a 76.1 percent deposit market share.

Strong competition for home mortgage loans also exists. As stated above, GNB’s primary business focus includes home mortgage lending. GNB ranks 5<sup>th</sup> out of 107 lenders in Henry, Randolph, and Wayne Counties in residential home mortgage volume based on 2021 Peer Mortgage Data and 2015 ACS U.S. Census data. GNB had 4.2 percent of the lending market share, based on the number of loans, as of the 2021 Peer Mortgage Data Report, lending \$4.1 million (33 loans). Top mortgage lenders in the AA include Caliber Home Loans, Inc., First Financial Bank, First Merchants Bank, and Rocket Mortgage, with a combined market share of 31.2 percent.

Community Contact/Credit Needs

As part of the CRA performance evaluation, the OCC reviewed information provided from one interview with a representative from a CD organization. The contact stated that quality affordable housing and downtown redevelopment across the region are needs in the area. The contact also stated that financial institutions can assist through loan and grant programs that support housing and downtown redevelopment efforts. In general, local financial institutions are adequately meeting the credit and CD needs of the community.



## Scope of Evaluation in Indiana

The OCC performed a full-scope review of the Indiana Non-MSA AA. The data in the AA was analyzed and presented as one AA for the purposes of this evaluation. Home mortgage and consumer lending are the bank's primary lending products and were evaluated under the Lending Test. As discussed above, the OCC used HMDA data for 2020 and 2021 for the home mortgage loan analysis and transaction tested 20 consumer loans per year for the Indiana Non-MSA AA. The OCC reviewed CD loans, investments, and services for 2020 and 2021.

The rating is based on performance in the Indiana Non-MSA AA. The bank has one branch in Indiana. Additionally, approximately two percent of the total deposits are in Indiana. Home mortgage and consumer loans were given equal weight in the AA. However, as stated above, the OCC gave more weight to the State of Ohio performance.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN INDIANA

### LENDING TEST

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

### Conclusions for Areas Receiving a Full-Scope Review

Based on a full-scope review, the bank's lending performance in the State of Indiana is reasonable.

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

The bank exhibits reasonable 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 OCC compared the percentage of home mortgage loans originated or purchased by the bank to the percentage of owner-occupied housing units (demographic data) in the four geographic income categories, placing emphasis on the LMI geographies. The OCC also compared the bank's performance against the percentage of home mortgage loans of other mortgage lenders (aggregate data) in the AA, as demonstrated by HMDA aggregate data.

In determining the rating, the OCC weighed demographic factors of the AA that could affect the bank's ability to lend. These factors include competition from other financial institutions, the number of LMI geographies, branch presence, area demographics, and the location of most owner-occupied housing.

The bank exhibits a reasonable distribution of home mortgage loans within the Indiana Non-MSA AA. The AA consists of one moderate-income CT and six middle income CTs. During the evaluation period, the percentage of home mortgage loans originated by the bank in moderate income CTs is below the demographic comparator and near the aggregate lending data of other HMDA reporters. There are no low-income CTs in the AA.

The OCC considered other factors contributing to limited lending opportunities within the moderate-income CT, which includes strong competition from other financial institutions. Additionally, GNB's one location in the Indiana Non-MSA AA is on the opposite side of the AA from the one moderate-income CT. Based on 2021 figures, there is a relatively low volume of housing units within the moderate-income tracts (1,847), as well as a moderate poverty rate (based on families below poverty) of 10 percent overall and modest vacancy rate in the AA (10.1 percent). Approximately 18.4 percent of the housing units are rental occupied. The median age of housing stock within the AA is 65 years. This may present an additional barrier to lending, given the cost of homeownership in older housing is typically higher than newer housing. Competition for loans is strong due to the volume of financial institutions in the AA. The top four financial institutions in home mortgage lending account for 31.2 percent of the home mortgage market share as of the 2021 Peer Mortgage Data report, with GNB ranking 5<sup>th</sup> out of 107 lenders with a lending market share of 4.2 percent. These performance context factors provide further support for the bank's lending in LMI tracts.

### ***Consumer Loans***

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

The OCC compared the percentage of consumer loans originated or purchased by the bank to the percentage of households (demographic data) in the four geographic income categories, placing emphasis on the LMI geographies. As consumer loans are not subject to reporting requirements, no comparison to peer (aggregate) lending data was available.

The bank exhibits an excellent distribution of consumer loans within the Indiana Non-MSA AA. During the evaluation period, the percentage of consumer loans originated or purchased by the bank in moderate-income CTs significantly exceeds demographic data. There are no low-income CTs in the AA.

### ***Lending Gap Analysis***

The OCC did not identify any unexplained, conspicuous gaps in the lending distribution during the review of bank reports and maps.

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

The bank exhibits a reasonable distribution of loans to individuals of different income levels, 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 OCC compared the percentage of home mortgage loans originated or purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level (demographic data), placing emphasis on lending to LMI families. The OCC also compared the bank's performance against home mortgage loans of other home mortgage lenders (aggregate data), as demonstrated by HMDA aggregate data.

The bank exhibits an overall reasonable distribution of home mortgage loans among borrowers of different income levels within the Indiana Non-MSA AA. GNB's percentage of home mortgage loans to low-income borrowers is below both demographic and aggregate data. However, the bank's percentage of home mortgage loans to moderate-income borrowers exceeds demographic data and equals aggregate data.

The OCC considered other factors in the bank's performance during the evaluation period, including the cost of homeownership in the AA as an obstacle to home ownership for LMI borrowers. As stated above, overall median housing values are 3.3 times the weighted average of the median family income of low-income families in the AA. This obstacle may result in fewer opportunities to originate mortgage loans to low-income families. Approximately 10 percent of the families live below the poverty level. Additionally, there is strong competition for loans in the Indiana Non-MSA AA. As stated above, GNB's home mortgage market share of 4.2 percent as of the 2021 Peer Mortgage Data ranks them 5<sup>th</sup> out of 107 lenders in the Indiana Non-MSA AA, with the top four lenders accounting for about 31.2 percent of the market share.

### ***Consumer Loans***

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

The OCC compared the percentage of consumer loans originated or purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level (demographic data). As consumer loans are not subject to reporting requirements, no comparison to peer (aggregate) lending data was available.

The bank exhibits an overall reasonable distribution of consumer loans among borrowers of different income levels within the Indiana Non-MSA AA. During the evaluation period, GNB's percentage of consumer loans to low-income borrowers is well below demographic data. However, the OCC considered the AA's poverty rate of 13.5 percent (households below poverty) as an obstacle to lending to low-income individuals. GNB's percentage of consumer loans to moderate-income borrowers exceeds demographic data.

### **Responses to Complaints**

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

## **COMMUNITY DEVELOPMENT TEST**

The bank's performance under the Community Development Test in the State of Indiana is rated Outstanding.

## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibits excellent responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AA.

GNB was particularly responsive to the COVID-19 pandemic and its level of CD loans were highly impactful. The OCC placed more weight on CD lending, given the bank's excellent responsiveness to the COVID-19 crisis and volume of CD loans made in response to the COVID-19 pandemic. It was noted that CD donations and services were impacted in 2020 and 2021 due to the COVID-19 pandemic.

GNB's participation in the SBA's PPP was particularly responsive to the credit needs of the businesses and enhanced the credit availability of this loan product. In 2021, GNB originated 12 SBA PPP loans in the Indiana Non-MSA AA totaling \$208,993. Additionally, GNB originated four SBA PPP loans in the statewide/regional area of Indiana totaling \$97,873. The PPP loans originated in 2021 met the definition of CD as part of the 2020 OCC CRA Rule and the expanded CD definitions.

### Number and Amount of Community Development Loans

The CD Loans Table, shown below, sets forth the information 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.

The number and dollar amount of qualified CD loans represent excellent responsiveness. During the evaluation period, GNB originated 19 qualified CD loans inside its AA totaling \$2.6 million. Additionally, the bank originated seven CD loans in the statewide/regional area.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Indiana Non-MSA AA	19	73.1	2,575	79.7
Statewide/Regional Loans with Indirect Benefit	7	26.9	656	20.3
Total	26	100.0	3,231	100.0

#### Indiana Non-MSA AA

GNB originated 19 CD loans totaling \$2.6 million inside the Indiana Non-MSA AA. Twelve of the 19 loans were SBA PPP loans in the bank's AA. The other seven were CD loans that helped revitalize and stabilize the moderate-income areas as well as job creation in the AA.

Statewide/Regional

GNB is responsive to the CD needs in its AAs so additional consideration was given to seven CD loans in the greater regional area of Indiana. Four of the seven loans were SBA PPP loans originated in Indiana and three were CD loans originated in Delaware County, Indiana, to revitalize and stabilize moderate-income areas, which is also near the bank's AA.

**Number and Amount of Qualified Investments**

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Indiana Non-MSA AA	0	0	6	2	6	100.0	2	100.0	0	0

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

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

The Qualified Investment Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified CD investments. The table includes all CD investments, including prior period investments that remain outstanding as of the evaluation date.

GNB's qualified CD investment activity represents adequate responsiveness. The bank made six donations totaling approximately \$1,950 in 2020 and 2021. Qualifying investments included small donations to non-profit organizations established to provide services to LMI persons, such as students, homeless veterans, and women in crisis pregnancy situations. It was noted that donations were significantly impacted in 2021 due to the COVID-19 pandemic.

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

GNB did not provide CD services in the Indiana Non-MSA AA. GNB has one office in Losantville, Indiana, in a middle-income CT. There are no other financial institutions in Losantville. The Indiana Non-MSA AA is in a rural area, and the bank's branch increases access to financial services in the community. Both total deposits and lending activity in this AA have increased since the previous CRA evaluation.

## Appendix A: Scope of Examination

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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 MSA(s) and non-MSA(s) 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”.

<b>Time Period Reviewed:</b>	1/1/20 – 12/31/21	
<b>Bank Products Reviewed:</b>	Home mortgage and consumer loans CD loans, qualified investments, and CD services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>State – Ohio</b>		
Ohio Non-MSA AA	Full-Scope	Darke County, Ohio – entire county.
Dayton MSA AA	Full-Scope	Portion of Miami County, Ohio, including the City of Troy and western portion of Miami County bordering Darke County. The following 16 CTs are included in this AA: 3001, 3150.01, 3150.02, 3151, 3153, 3201, 3250, 3301, 3401, 3450, 3650, 3651.01, 3651.02, 3652, 3653.01, and 3653.02.
<b>State – Indiana</b>		
Indiana Non-MSA AA	Full-Scope	Portions of Randolph (CTs 9514, 9516, 9520, and 9521), Wayne (CTs 103 and 103), and Henry (CT 9756) Counties in Indiana, including the village of Losantville.

## Appendix B: Summary of State Ratings

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RATINGS: GREENVILLE NATIONAL BANK			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Greenville National Bank	Satisfactory	Outstanding	Satisfactory
States:			
Ohio	Satisfactory	Outstanding	Satisfactory
Indiana	Satisfactory	Outstanding	Satisfactory

(\*) The Lending Test and Community Development Test carry equal weight in the overall rating.

## Appendix C: Definitions and Common Abbreviations

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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 (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.

**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

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### 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 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. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's 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.

State of Ohio

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000s)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Ohio Non-MSA AA	440	67,421	74.3	1,695	0.0	0.0	0.0	11.4	8.0	11.9	74.4	75.7	74.3	14.2	16.4	13.8	0.0	0.0	0.0
Dayton MSA AA	152	34,468	25.7	4,214	0.0	0.0	0.0	19.0	4.6	15.2	66.8	73.0	68.2	14.2	22.4	16.6	0.0	0.0	0.0
<b>Total</b>	<b>592</b>	<b>101,889</b>	<b>100.0</b>	<b>5,909</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>15.8</b>	<b>7.1</b>	<b>14.3</b>	<b>70.0</b>	<b>75.0</b>	<b>69.9</b>	<b>14.2</b>	<b>17.9</b>	<b>15.8</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000s)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Ohio Non-MSA AA	440	67,421	74.3	1,695	21.2	5.7	7.8	17.5	18.4	23.2	24.1	22.0	23.4	37.3	49.5	31.2	0.0	4.3	14.5
Dayton MSA AA	152	34,468	25.7	4,214	21.4	2.0	9.9	18.3	19.7	22.9	22.4	13.2	22.3	37.9	58.6	28.0	0.0	6.6	16.9
<b>Total</b>	<b>592</b>	<b>101,889</b>	<b>100.0</b>	<b>5,909</b>	<b>21.3</b>	<b>4.7</b>	<b>9.3</b>	<b>18.0</b>	<b>18.8</b>	<b>23.0</b>	<b>23.1</b>	<b>19.8</b>	<b>22.6</b>	<b>37.7</b>	<b>51.9</b>	<b>28.9</b>	<b>0.0</b>	<b>4.9</b>	<b>16.2</b>
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.																			

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 U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2020-21
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$ (000s)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Ohio Non-MSA AA	40	593	50.0	0.0	0.0	16.2	20.0	71.2	67.5	12.6	12.5	0.0	0.0
Dayton MSA AA	40	618	50.0	0.0	0.0	20.5	20.0	68.0	75.0	11.5	5.0	0.0	0.0
<b>Total</b>	<b>80</b>	<b>1,211</b>	<b>100.0</b>	<b>0.0</b>	<b>0.0</b>	<b>18.8</b>	<b>20.0</b>	<b>69.3</b>	<b>71.3</b>	<b>11.9</b>	<b>8.8</b>	<b>0.0</b>	<b>0.0</b>
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%.													

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2020-21
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$ (000s)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Ohio Non-MSA AA	40	593	50.0	22.4	17.5	18.3	22.5	19.5	17.5	39.8	42.5	0.0	0.0
Dayton MSA AA	40	618	50.0	22.6	2.5	17.4	17.5	18.1	35.0	41.9	45.0	0.0	0.0
<b>Total</b>	<b>80</b>	<b>1,211</b>	<b>100.0</b>	<b>22.5</b>	<b>10.0</b>	<b>17.7</b>	<b>20.0</b>	<b>18.7</b>	<b>26.3</b>	<b>41.1</b>	<b>43.8</b>	<b>0.0</b>	<b>0.0</b>
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%.													

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.

## State of Indiana

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000s)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Indiana Non-MSA AA	54	8,289	100.0	785	0.0	0.0	0.0	13.1	7.4	8.8	86.9	92.6	91.2	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>54</b>	<b>8,289</b>	<b>100.0</b>	<b>785</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>13.1</b>	<b>7.4</b>	<b>8.8</b>	<b>86.9</b>	<b>92.6</b>	<b>91.2</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data.  
Due to rounding, totals may not equal 100.0%.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000s)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Indiana Non-MSA AA	54	8,290	100.0	785	18.2	5.6	8.5	21.3	24.1	24.1	22.2	33.3	27.1	38.3	37.0	27.1	0.0	0.0	13.1
<b>Total</b>	<b>54</b>	<b>8,290</b>	<b>100.0</b>	<b>785</b>	<b>18.2</b>	<b>5.6</b>	<b>8.5</b>	<b>21.3</b>	<b>24.1</b>	<b>24.1</b>	<b>22.2</b>	<b>33.3</b>	<b>27.1</b>	<b>38.3</b>	<b>37.0</b>	<b>27.1</b>	<b>0.0</b>	<b>0.0</b>	<b>13.1</b>

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data.  
Due to rounding, totals may not equal 100.0%.

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 U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2020-21
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$ (000s)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Indiana Non-MSA AA	40	565	100.0	0.0	0.0	16.5	27.5	83.5	72.5	0.0	0.0	0.0	0.0
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%.													

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2020-21
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$ (000s)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Indiana Non-MSA AA	40	565	100.0	22.2	2.5	18.3	20.0	19.7	27.5	39.8	50.0	0.0	0.0
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%.													

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.

## GNB BANKING CENTER LOCATIONS

<b><u>Banking Center Name</u></b>	<b><u>Address</u></b>	<b><u>Block Numbering Area</u></b>
Main Banking Center	446 S. Broadway Greenville, OH 45331	5551.01
Consumer Loan Center	114 W. Fourth St. Greenville, OH 45331	5551.01
Sycamore Banking Center	133 W. Fourth St. Greenville, OH 45331	5551.01
Chestnut Banking Center	750 Chestnut St. Greenville, OH 45331	5551.01
Northtown Banking Center	480 Wagner Ave. Greenville, OH 45331	5550.01
Ansonia Banking Center	100 S. Main St. Ansonia, OH 45303	5201
Arcanum Banking Center	2860 Alt. St. Rt. 49 N. Arcanum, OH 45304	5701.02
Gettysburg Banking Center	100 E. Main St. Gettysburg, OH 45328	5401
Versailles Banking Center	16 Marker Rd. Versailles, OH 45380	5301
Bradford Banking Center	11929 US Rt 36 W Bradford, OH 45308	3201
Troy Banking Center	846 W. Main St. Troy, OH 45373	3653.01
Losantville Banking Center	9700 S US Rt 35 Losantville, IN 47354	9521

The history of “The Greenville National Bank” dates back to 1876 when it was originally chartered by the State of Ohio; then as a national bank in 1903. The bank was reorganized in 1934 as “Greenville National Bank”. In 2019 we began using the trade name “GNB Banking Center”.

GNB is an independent locally owned financial institution, which translates into local decision making. We are hometown people serving hometown people. We are committed to the communities we serve as we support businesses, schools, organizations and events in each and every community we serve.

We offer a variety of deposit account options for our consumer and business customers; checking, savings, certificates of deposit, individual retirement accounts and health savings accounts. Deposit products and transactions are available at all locations except the Consumer Loan office.

Our experienced lending staff provides prompt, convenient service to our customers with a large variety of loan products for personal, business and agricultural needs. Loan officers are available at the Main Banking Center, Consumer Loan Center, Northtown, Ansonia, Arcanum, Versailles, Bradford, Troy and Losantville Banking Centers and at other locations by appointment.

We have convenient hours at all our locations:

8:00 a.m. – 4:30 p.m. Monday thru Thursday  
8:00 a.m. – 6:00 p.m. Friday  
8:00 a.m. – 11:30 a.m. Saturday

We offer 24-hour service with 8 full service ATM’s. Our customers can access their accounts, anytime, anywhere with Online and Mobile Banking.



# GREENVILLE NATIONAL BANK

## OPENED BRANCHES

<u>Branch Name</u>	<u>Address</u>	<u>BNA</u>	<u>Year Opened</u>
Versailles Banking Center	16 Marker Rd Versailles OH 45380	5301	2024

# GREENVILLE NATIONAL BANK

## CRA ASSESSMENT AREAS

### **OHIO**

All of Darke County, West and Central Miami County; the geographies in this assessment area include

- Darke County tract numbers:

5001  
5101  
5201  
5301  
5401  
5501  
5550.01  
5550.02  
5551.01  
5551.02  
5601  
5701.01  
5701.02

- Miami County tract numbers:

3001  
3150.01  
3150.02  
3151  
3153  
3201  
3250  
3301  
3401  
3450  
3650.01  
3650.02  
3651.01  
3651.02  
3652  
3653.01  
3653.02

# GREENVILLE NATIONAL BANK

## CRA ASSESSMENT AREAS

### **INDIANA**

East and Southwest Randolph County, Northwest Wayne County and Northeast Henry County; the geographies in this assessment area include

- Randolph County tract numbers:  
9514  
9516  
9520  
9521
- Wayne County tract numbers:  
103  
104
- Henry County tract number:  
9756







# GREENVILLE NATIONAL BANK

## QUARTER-END LOAN TO DEPOSIT RATIOS

2023

First Quarter	3/31/23	69.45%
Second Quarter	6/30/23	71.38%
Third Quarter	9/30/23	74.45%
Fourth Quarter	12/31/23	77.45%

## **Home Mortgage Disclosure Act (HMDA) Notice**

The HMDA data about our residential mortgage lending are available online for review. The data show geographic distribution of loans and applications; ethnicity, race, sex and income of applicants and borrowers; and information about loan approvals and denials. These data are available online at the Consumer Financial Protection Bureau's website ([www.consumerfinance.gov/hmda](http://www.consumerfinance.gov/hmda)). HMDA data for many other financial institutions are also available at this website.