



PUBLIC DISCLOSURE

January 10, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First Robinson Savings Bank, National Association

Charter Number 23393

501 East Main Street, Robinson, IL 62454

Office of the Comptroller of the Currency

2001 Butterfield Road, Suite 400, Downers Grove, IL 60515

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: Satisfactory

The major factors that support this rating include:

- The Lending Test rating is based on satisfactory performance in the State of Illinois and the State of Indiana. The First Robinson Savings Bank (FRSB) distribution of loans to individuals of different incomes is reasonable throughout the assessment area (AA). The bank's distribution of loans across geographies of different income levels is reasonable throughout the AA.
- FRSB loan-to-deposit (LTD) ratio is reasonable.
- The Community Development (CD) Test rating is based on satisfactory performance in the State of Illinois and State of Indiana. FRSB demonstrated adequate responsiveness to CD needs by engaging in a combination of CD loans, qualified investments, and CD services.
- FRSB did not receive any complaints regarding its CRA performance during the evaluation period.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA(s), FRSB's loan-to-deposit ratio is reasonable. FRSB's quarterly LTD ratio averaged 67.8 percent over the 12-quarter period ending December 31, 2020. Over this period, the bank's quarterly LTD ratio ranged from a low of 58.2 percent to a high of 73.3 percent.

We analyzed the quarterly LTD ratios of three similarly situated federal and state banks in the AA based on a combination of size, location, and lending opportunities. The banks range in asset size of \$50,500 to \$415,000, with an average quarterly LTD ratio of between 72.3 to 81.7 percent over the same evaluation period. While FRSB's LTD ratio was the lowest compared to this group, it is reasonable.

Lending in Assessment Area

A substantial majority of the bank's loans are inside its AA. FRSB originated and purchased 85.0 percent of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank level, rather than by AA. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Table D - 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		
	#	%	#	%		\$	%	\$	%	
Consumer Loans	18	90.0	2	10.0	20	269.2	93.8	17.7	6.2	286.9
Home Mortgage Loans	16	80.0	4	20.0	20	1,688.5	72.7	635.4	27.3	2,323.9
Total	34	85.0	6	15.0	40	1,957.7	75.0	653.1	25.0	2610.8

*Source: Sample of 20 consumer and 20 home mortgage loans originated between 1/1/2018 and 12/31/2020
Due to rounding, totals may not equal 100.0%*

Description of Institution

First Robinson Savings Bank, National Association (FRSB) is a \$455.8 million interstate financial institution headquartered in Robinson, Illinois (IL). The bank is a wholly owned subsidiary of First Robinson Financial Corporation, a one-bank holding company. The bank is a full-service banking institution and operates three banking offices in Robinson, Palestine, and Oblong in IL, and two branches in Vincennes, Indiana (IN). The bank owns and operates seven automated teller machines (ATMs) in IL, three of which are deposit-taking and located at the branches. There are five ATMs in IN, four of which are deposit-taking and two are located at the branches. The other two deposit-taking ATMs are at Knox Plaza in Vincennes, IN and a gas station in Monroe City, IN. Based on the branch locations, FRSB has established two AAs containing Crawford County in IL (Illinois Non-MSA AA) and Knox County in IN (Indiana Non-MSA AA). There have been no merger or acquisition activities affecting the bank's CRA performance since the last evaluation.

FRSB offers conventional deposit and loan products. In addition, the bank offers online and mobile banking. The bank also offers fiduciary asset management, retail non-deposit investment sales, and insurance products.

As of December 30, 2020, the bank's loan portfolio totaled \$205.2 million, or 49.4 percent of total assets. Tier 1 capital was \$33.9 million.

FRSB's business strategy is to be a community bank dedicated to equal, friendly, and quality service. There are no known impediments limiting the bank's ability to help meet the credit needs of its local community, including low- and moderate-income families and neighborhoods.

FRSB's deposit market share in the IL Non-MSA AA is strong at 43.3 percent, ranking first out of six banks serving the AA. FRSB's deposit market share in the IN Non-MSA AA is good at 16.29 percent,

ranking fourth out of eight banks serving the AA. FRSB received a Satisfactory rating during the October 10, 2018 evaluation.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated FRSB's CRA performance using intermediate small bank evaluation procedures, which reviewed the bank's record of meeting the credit needs of its AA through lending activities and CD activities. The Lending Test reflects an evaluation of FRSB's record of meeting the credit needs of the AA through its lending activities. The CD Test reflects an evaluation of FRSB's responsiveness to CD needs of the AA through loans, qualified investments, and services with a CD purpose made during the evaluation period. The evaluation period for this review is from January 1, 2018, to December 31, 2020. We sampled loans from the entire evaluation period for the Lending Test.

Based on both the number and dollar volume of loan origination data supplied by the bank, FRSB's primary lending products are consumer and home mortgage loans. Consumer loans represent 40.9 percent of the number and 7.0 percent of the dollar volume of loan originations for 2018, 2019, and 2020. Home mortgage loans represent 37.9 percent of the number and 58.3 percent of the dollar volume of originations for the same time period. We sampled consumer and home mortgage loans for this evaluation.

For analysis purposes, we compared the bank's lending performance with demographic data from the 2015 American Community Survey (ACS) U.S. Census, 2020 Dun and Bradstreet Data, 2019 CRA Aggregate Data, and FDIC deposit market share data as of June 30, 2020. No affiliate activity was included in this analysis. Refer to the table in Appendix A for more information on the scope of the review.

Selection of Areas for Full-Scope Review

FRSB has two AAs, and we completed a full-scope review of both AAs.

Ratings

FRSB's overall rating is based on the full-scope review of both the State of Illinois and the State of Indiana ratings. Performance in the IL AA was given more weight based on the volume of loan originations compared to the IN AA. Consumer loans originated in the AAs were 72.9 percent in the IL AA and 27.1 percent in the IN AA. Home mortgage loans originated in the AAs were 60.6 percent in the IL AA and 39.4 percent in the IN AA. The analysis also placed more weight on the borrower distribution criterion, as the percentage of low- and moderate-income (LMI) households in both the IL AA (37.6 percent) and the IN AA (43.8 percent) were higher than the percentage of LMI geographies in the IL AA (15.5 percent) and the IN AA (30.0 percent.) respectively. It is appropriate to note that the

moderate-income CTs in the IN AA are primarily dominated by the campus of Vincennes University and adjacent student housing, which limits home mortgage loan opportunities.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

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

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

State Rating

State of Illinois

CRA rating for the State of Illinois¹: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The Lending Test rating is based on satisfactory performance in the State of Illinois. The bank's distribution of loans to individuals of different incomes is reasonable throughout the AA. FRSB's distribution of loans across geographies of different income levels is reasonable throughout the AA.
- FRSB originated or purchased a majority of loans within the AA.
- FRSB's loan-to-deposit ratio is reasonable.
- The CD Test is based on satisfactory performance in the State of Illinois. FRSB demonstrates adequate responsiveness to CD needs by engaging in a combination of CD loans, qualified investments, and CD services.

Description of Institution's Operations in Illinois

The AA consists of the entirety of Crawford County in IL. Crawford County is located in southeast Illinois bordering the Indiana state line. The county is not located within an MSA. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies. There are no low-income CTs, one moderate-income CTs, three middle-income CTs, and two upper-income CTs in the AA.

Competition

Competition for deposits in the AA is moderate. According to the Federal Deposit Insurance Corporation (FDIC) market share information as of June 30, 2020, FRSB had \$230.1 million in deposits from within Crawford County, which represented 68.1 percent of the bank's total deposits. FRSB ranked first out of six FDIC-insured institutions with 43.3 percent market share for deposits in these counties. The depository banks with the second and third highest deposit market share are First National Bank in Olney with 19.1 percent of market share and First Financial Bank, National Association with 14.6 percent.

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

Demographics

Table A – Demographic Information of the Assessment Area						
Assessment Area: Robinson IL AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	6	0.0	16.7	50.0	33.3	0.0
Population by Geography	19,541	0.0	15.5	52.1	32.4	0.0
Housing Units by Geography	8,643	0.0	18.8	49.1	32.1	0.0
Owner-Occupied Units by Geography	6,072	0.0	15.6	47.7	36.7	0.0
Occupied Rental Units by Geography	1,548	0.0	22.5	57.2	20.3	0.0
Vacant Units by Geography	1,023	0.0	31.8	45.1	23.2	0.0
Businesses by Geography	1,095	0.0	20.5	49.0	30.4	0.0
Farms by Geography	151	0.0	1.3	47.7	51.0	0.0
Family Distribution by Income Level	5,047	17.4	18.1	19.7	44.8	0.0
Household Distribution by Income Level	7,620	22.4	15.2	18.5	43.9	0.0
Median Family Income Non-MSAs - IL		\$59,323	Median Housing Value			\$82,529
			Median Gross Rent			\$558
			Families Below Poverty Level			8.6%
<i>Source: 2015 ACS and 2020 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Employment and Economic Factors

According to the Bureau of Labor Statistics (BLS), unemployment rates in the AA were improving until the COVID-19 pandemic national emergency began in March 2020. As of December 31, 2020, unemployment rates for the AA are better than the state and national averages of 7.9 percent and 6.7 percent respectively.

Annual Unemployment Rates				
Area	2018	2019	2020	Peak
Crawford County	6.0%	3.6%	5.8%	16.2%
State of Illinois	4.4%	3.3%	7.9%	16.3%
National	3.9%	3.6%	6.7%	14.8%
<i>Source: U.S. Department of Labor; Bureau of Labor Statistics. Rates are not seasonally adjusted. Unemployment rates are as of December 31 of each year. Peak is as of April 30, 2020.</i>				

Industries driving the local economy include agriculture, retail, and services. The largest employers in Crawford County are Marathon Petroleum Company followed by Dana Sealing Products Corporation (auto parts).

The percentage of families in the AAs living below the poverty level is 11.8 percent. Families residing in the moderate-income CTs that live below the poverty level total 24.7 percent.

Community Contact

We performed one community contact with a not-for-profit corporation that serves the AA. The contact noted the local economy was negatively impacted by COVID-19 particularly with increases in mom and pop store closings, lower wages, increased unemployment, and housing shortages, including rental housing stock. In addition, the farm community has been impacted due to the significant delay of manufactured parts for farm equipment. Locally owned small businesses in smaller rural communities away from interstate highways have been especially hard hit. Opportunities include support for affordable housing programs and organizations providing social services in the AA.

Scope of Evaluation in Illinois

FRSB has one AA in the state of Illinois, and we completed a full-scope review of this AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Distribution of Loans by Income Level of the Geography

FRSB exhibits reasonable geographic distribution of loans in the state of Illinois. We did not identify any unexplained conspicuous lending gaps in the AA.

Consumer Loans

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

FRSB exhibits reasonable geographic distribution of consumer loans in the AA. Lending in the moderate-income CTs was near to the demographic comparator for percentage of households. There are no low-income CTs in the AA.

Home Mortgage Loans

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

FRSB exhibits reasonable geographic distribution of home mortgage loans in the AA. Lending in the moderate-income CTs exceeded the demographic comparator and was near to the aggregate comparator for percent of owner-occupied housing units. There are no low-income CTs in the AA.

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.

Consumer Loans

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

FRSB exhibits reasonable borrower distribution of consumer loans in the AA. Lending to low-income borrowers was lower than the demographic comparator for percentage of households. However, lending to moderate-income borrowers significantly exceeded the demographic comparator.

Home Mortgage Loans

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

FRSB exhibits reasonable borrower distribution of home mortgage loans in the AA considering performance context factors. Based on our sample of 30 loans, lending to low-income borrowers was lower than the demographic comparator and near to the aggregate comparator for percentage of families. Lending to moderate-income borrowers was near to the demographic comparator and significantly lower than the aggregate comparator.

In evaluating the borrower distribution of home mortgage loans, we noted families with incomes below the poverty level in the AA was 8.6 percent. People living in poverty have a difficult time qualifying for traditional mortgages. We also considered the median age of housing stock was 57 years in the AA but increased to 64 years in the moderate-income CTs. Older housing often costs more to maintain, frequently requires significant repairs to bring dwellings up to code requirements, and often is less energy efficient. All of these factors add to the overall cost of homeownership, which can affect the ability of LMI individuals to qualify for home mortgage loans.

Responses to Complaints

FRSB did not receive any complaints regarding its CRA performance during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of Illinois is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Community Development Loans

The Community Development 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.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
AA	70	100.0	\$8,622.6	100.0
Out of AA	0	0.0	\$0	0.0

FRSB's level of CD lending provided a reasonable responsiveness to community credit needs in the AA. During the evaluation period, FRSB originated seven CD loans totaling \$1.5 million, or 4.5 percent of tier 1 capital. CD loans consisted of the following:

- \$320,000 loan to locally owned company constructing a new building in a TIF district.
- \$539,532 loan to purchase a fire truck for a fire department located in a moderate-income census tract.
- \$245,471 loan to a local ambulance service located in a moderate-income census tract.
- \$200,000 loan to a local business that helped keep 45 people employed.
- \$160,000 loan to a daycare that accommodates up to 83 children and employees 23 employees.
- \$10,000 loan to a daycare that is supported by the State of Illinois.
- \$80,476 loan to a local municipality where two TIF districts are located to purchase equipment.
- \$5.3 million in 34 business loans through the Small Business Administration (SBA) guaranteed Paycheck Protection Program (PPP); all businesses were in moderate income CTs. The PPP was established under the CARES Act in response to the COVID-19 pandemic national emergency. PPP loans support economic development through the retention of jobs that would otherwise be lost due to business and farm closures as a result of the COVID-19 pandemic. PPP loans also help to revitalize and stabilize LMI or distressed/underserved geographies by retaining business and farms; helping them stay in operation during the pandemic.
- \$1.8 million in 29 loans to finance affordable housing in the AA for LMI families through the United States Department of Agriculture (USDA) Guaranteed Rural Development Housing Loan Program. This program requires little or no down payment and has lenient eligibility requirements for LMI homebuyers. Eight homes were located in the moderate-income CT.

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)
Robinson IL AA	2	\$356.7	146	\$4,955.7	148	100.0	\$5,312.4	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 level of qualified investments reflects reasonable responsiveness to community needs in the AA. During the evaluation period, FRSB made six investments and 140 donations totaling \$4.9 million

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

which represents 14.5 percent of tier 1 capital. There were also two investments from the prior period that are outstanding as of the examination date. Those investments total \$356,700 which represents 1 percent of capital.

FRSB received credit this period for investing \$4.6 million in six general obligation school bonds benefiting one school district which has schools located in moderate-income census tracts. The prior period investments were for another school district where the elementary school has 50 percent of the students on free and reduced lunches for the 2020-2021 school year.

FRSB provided 140 donations totaling \$282,924 to organizations providing community services, affordable housing to LMI individuals, and economic improvements in these geographies located inside the AA.

Extent to Which the Bank Provides Community Development Services

FRSB provided a reasonable level of CD services in the AA. The branch structure provides good accessibility to banking services in moderate-income CTs. The bank operates one branch located in a moderate-income CT in Robinson, representing 20 percent of all branches.

During the evaluation period, 30 employees, consisting of directors, officers, and staff, provided community service, financial/technical expertise, and economic development hours to nonprofit organizations, including holding leadership roles. Total hours during the evaluation period was 1,938 and benefited 23 organizations primarily focused on community services, providing financial education, and economic development to LMI individuals and improvements in moderate geographies. Seventeen of those employees were also involved in leadership roles in 15 organizations.

State Rating

State of Indiana

CRA rating for the State of Indiana²: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The Lending Test rating is based on satisfactory performance in the State of Indiana. The bank's distribution of loans to individuals of different incomes is reasonable throughout the AA. FRSB's distribution of loans across geographies of different income levels is reasonable throughout the AA.
- FRSB originated or purchased a majority of loans within the AA.
- FRSB's loan-to-deposit ratio is reasonable.
- The CD Test is based on satisfactory performance in the State of Indiana. FRSB demonstrates adequate responsiveness to CD needs by engaging in a combination of CD loans, qualified investments, and CD services.

Description of Institution's Operations in Indiana

The AA consists of the entirety of Knox County in IN. Knox County is located in southwestern Indiana, approximately 58 miles southwest of Terre Haute, and bordering the State of IL. The county is not located within an MSA. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies. There are no low-income CTs, three moderate-income CTs, four middle-income CTs, and three upper-income CTs in the AA.

Competition

Competition for deposits in the AA is moderate. According to the Federal Deposit Insurance Corporation (FDIC) market share information as of June 30, 2020, FRSB had \$137.4 million in deposits from within Knox County, which represented 40.6 percent of the bank's total deposits. FRSB ranked fourth out of eight FDIC-insured institutions with 16.3 percent market share for deposits in this county. The depository banks with the second and third highest deposit market share are Old National Bank with 27.2 percent of market share and German American Bank with 20.7 percent.

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

Demographics

Table A – Demographic Information of the Assessment Area						
Assessment Area: Robinson IN AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	10	0.0	30.0	40.0	30.0	0.0
Population by Geography	38,062	0.0	23.0	48.0	29.0	0.0
Housing Units by Geography	16,997	0.0	22.8	47.4	29.7	0.0
Owner-Occupied Units by Geography	9,755	0.0	15.0	50.3	34.7	0.0
Occupied Rental Units by Geography	5,024	0.0	35.9	45.0	19.0	0.0
Vacant Units by Geography	2,218	0.0	27.5	40.2	32.2	0.0
Businesses by Geography	2,378	0.0	26.5	48.0	25.5	0.0
Farms by Geography	285	0.0	3.9	53.7	42.5	0.0
Family Distribution by Income Level	9,362	19.2	18.5	22.0	40.3	0.0
Household Distribution by Income Level	14,779	26.1	17.7	17.0	39.2	0.0
Median Family Income Non-MSAs - IN		\$55,715	Median Housing Value			\$90,864
			Median Gross Rent			\$628
			Families Below Poverty Level			11.1%
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Employment and Economic Factors

According to the Bureau of Labor Statistics (BLS), unemployment rates in the AA were improving until the COVID-19 pandemic national emergency began in March 2020. As of December 31, 2020, unemployment rates for the county in the AA were better than the state and national averages of 7.1 percent and 6.7 percent respectively.

Annual Unemployment Rates				
Area	2018	2019	2020	Peak
Knox County	3.1%	3.0%	5.9%	15.1%
State of Indiana	3.4%	3.2%	7.1%	16.5%
National	3.9%	3.6%	6.7%	14.8%
<i>Source: U.S. Department of Labor; Bureau of Labor Statistics. Rates are not seasonally adjusted.</i> <i>Unemployment rates are as of December 31 of each year. Peak is as of April 30, 2020.</i>				

Industries driving the local economy include agriculture, retail, and services. The largest employers in Knox County are Good Samaritan Hospital followed by Futaba Indiana of American.

The percentage of families in the AAs living below the poverty level is 11.1 percent. Families residing in the moderate-income CTs that live below the poverty level total 14.6 percent. Moderate-income geographies account for 35.1 percent of the CTs in the AA based on the 2015 ACS U.S. Census.

Community Contact

We utilized one community contact with a small business Development Center that serves the AA. The contact noted the local economy was negatively impacted by COVID-19 particularly with the unknown aftermath. The county has manufacturing but wants more and lacks sufficient broadband to support economic development. Opportunities include support for downtown redevelopment and economic development for small businesses.

Scope of Evaluation in Indiana

FRSB has one AA in the state of Indiana, and we completed a full-scope review of this AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN INDIANA

LENDING TEST

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

Conclusions for Area 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

FRSB exhibits reasonable geographic distribution of loans in the state of Indiana. We did not identify any unexplained conspicuous lending gaps in the AA.

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.

FRSB exhibits reasonable geographic distribution of consumer loans in the AA. Lending in the moderate-income CTs was near to the demographic comparator for percentage of households. There are no low-income CTs in the AA.

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 geographic distribution of the bank's home mortgage loan originations and purchases.

FRSB exhibits reasonable geographic distribution of home mortgage loans in the AA. Lending in the moderate-income CTs was near to the demographic comparator and exceeded the aggregate comparator for percent of owner-occupied housing units. There are no low-income CTs in the AA.

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.

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.

FRSB exhibits reasonable borrower distribution of consumer loans in the AA. Based on our sample of 30 loans, lending to low-income borrowers was lower than the demographic comparator for percentage of households. However, lending to moderate-income borrowers exceeded the demographic comparator. We note the poverty rate for households in the AA is high at 15.5 percent.

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 originations and purchases of home mortgage loans.

FRSB exhibits reasonable distribution of home mortgage loans in the AA considering performance context factors. Based on our sample of 40 loans, lending to low-income borrowers was lower than both the demographic and aggregate comparators for percentage of families. However, lending to moderate-income borrowers was near to both the demographic and aggregate comparators.

In evaluating the borrower distribution of home mortgage loans, we noted families with incomes below the poverty level in the AA was 11.1 percent. People living in poverty have a difficult time qualifying for traditional mortgages. We also considered the median age of housing stock was 61 years in the AA but increased to 76 years in the moderate-income CTs. Older housing often costs more to maintain, frequently requires significant repairs to bring dwellings up to code requirements, and often is less energy efficient. All of these factors add to the overall cost of homeownership, which can affect the ability of LMI individuals to qualify for home mortgage loans.

Responses to Complaints

FRSB did not receive any complaints regarding its CRA performance during the evaluation period.

COMMUNITY DEVELOPMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Community Development Loans

The Community Development 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.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
AA	36	99.7	\$260,846.4	99.6
Out of AA	1	0.3	\$924.0	0.4

FRSB's level of CD lending provided reasonable responsiveness to community credit needs in the AA. During the evaluation period, FRSB originated 12 CD loans totaling \$3.798 million (11.21 percent of tier 1 capital) CD loans consisted of the following,

- \$966,000 originated loans provided affordable housing for LMI individuals. One loan was made for a non-profit organization located in a moderate geography whose profits go to help individuals with rent and utilities. Two loans financed purchases of multi-family rental properties that have rents below the AA median level.
- \$1.14 million loans originated for not-for-profit organizations for providing community services to low- and moderate-income residents. One organization is located in a moderate geography and help educate, assist, and advocate for vulnerable children and families while the second organization will built a new facility located outside the AA and will have a Head Start Program, which promotes the school readiness of infants, toddlers, and preschool-aged children from low-income families.
- \$1.68 million in loans originated to two small businesses and two nonprofit organizations. Loans promoted economic development by creating and retaining jobs for LMI individuals in moderate geographies. In addition, one loan was originated to help revitalize a historic downtown area.
- \$1.9 million in 22 business loans through the Small Business Administration (SBA) guaranteed Paycheck Protection Program (PPP); all businesses were in moderate income CTs. The PPP was established under the CARES Act in response to the COVID-19 pandemic national emergency. PPP loans support economic development through the retention of jobs that would otherwise be lost due to business and farm closures as a result of the COVID-19 pandemic. PPP loans also help to revitalize and stabilize LMI or distressed/underserved geographies by retaining business and farms; helping them stay in operation during the pandemic.
- \$256.0 million in three loans to finance affordable housing in the AA for LMI families through the United States Department of Agriculture (USDA) Guaranteed Rural Development Housing Loan Program. This program requires little or no down payment and has lenient eligibility requirements for LMI homebuyers. Two homes were located in the moderate-income CTs.

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)
Robinson IN AA	0	0	136	\$2,497	136	100	\$2,497	100	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.

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

The level of qualified investments reflects adequate responsiveness to community needs in the AA. During the evaluation period, FRSB made 6 investments and 130 donations totaling \$2.38 million which represents 7.04 percent of tier 1 capital and \$112,493.12, or 0.33 percent respectively.

FRSB received credit for investing \$1.26 million in six school bonds benefiting community services to LMI individuals at four school districts where a majority of students in these school districts participate in the free (or reduced) lunch program.

The remaining bonds were to construct, acquire, and improve the city's sewer system in Knox County that will benefit the improvement in the moderate geographies, which promotes economic development.

FRSB provided 130 donations totaling \$112,493.12 to organizations providing community services, affordable housing to LMI individuals, and economic improvements in these geographies located inside the AA.

Extent to Which the Bank Provides Community Development Services

FRSB provided reasonable responsiveness of level of CD services in the IN Non-MSA AA. The branch structure provides good accessibility to banking services in moderate-income CTs. There are no low-income CTs in the AA. The bank operates two branches in Indiana, representing 40 percent of all bank branches.

During the evaluation period, 11 employees, consisting of directors, officers, and staff, provided community service, financial/technical expertise, and economic development hours to nonprofit organizations, including holding leadership roles. Total hours during the evaluation period was 1,004 and benefited 21 organizations primarily focused on community services, providing financial education, and economic development to LMI individuals and improvements in moderate geographies.

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

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the 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”.

Time Period Reviewed:	01/01/2018 to 12/31/2020	
Bank Products Reviewed:	Home mortgage and consumer loans Community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		
Illinois Non-MSA AA	Full scope	
Indiana Non-MSA AA	Full scope	

Appendix B: Summary of MMSA and State Ratings

RATINGS First Robinson Savings Bank, NA			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
First Robinson Savings Bank	Satisfactory	Satisfactory	Satisfactory
State:			
Illinois	Satisfactory	Satisfactory	Satisfactory
Indiana	Satisfactory	Satisfactory	Satisfactory

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

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

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

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

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table 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.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2018-20

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ ('000)	% 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
IL AA	30	3,726	--	207	0.0	0.0	0.0	15.6	16.7	18.8	47.7	53.3	46.4	36.7	30.0	34.8	0.0	0.0	0.0
IN AA	40	4,116	--	1,070	0.0	0.0	0.0	15.0	15.0	13.0	50.3	52.5	46.0	34.7	32.5	41.0	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2018-20

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ ('000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
IL AA	30	3,726	--	207	17.4	13.3	14.5	18.1	16.7	31.9	19.7	26.7	16.4	44.8	43.3	26.6	0.0	0.0	10.6
IN AA	40	4,116	--	1,070	19.2	5.0	9.3	18.5	17.5	21.6	22.0	25.0	23.0	40.3	52.5	29.3	0.0	0.0	16.8

Source: 2015 ACS Census ; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography														2018-20	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts			
	#	\$ ('000)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans		
IL AA	20	264	--	0.0	0.0	17.0	15.0	49.6	55.0	33.3	30.0	0.0	0.0		
IN AA	30	336	--	0.0	0.0	22.1	20.0	48.5	50.0	29.4	30.0	0.0	0.0		
<i>Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data. Due to rounding, totals may not equal 100.0%</i>															

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower														2018-20	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers			
	#	\$ ('000)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans		
IL AA	20	264	--	22.4	15.0	15.2	30.0	18.5	25.0	43.9	30.0	0.0	0.0		
IN AA	30	336	--	26.1	10.0	17.7	20.0	17.0	26.8	39.2	43.3	0.0	0.0		
<i>Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data. Due to rounding, totals may not equal 100.0%</i>															