



Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

November 13, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First Robinson Savings Bank, National Association

Charter: 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: Outstanding.

The major factors that support this rating include:

- The Lending Test rating is based on satisfactory performance in the State of Illinois and poor performance in the State of Indiana. The First Robinson Savings Bank (FRSB) distribution of loans to individuals of different incomes is reasonable in the State of Illinois and poor in the State of Indiana. 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 its AA.
- FRSB's loan-to-deposit (LTD) ratio is reasonable.
- The Community Development (CD) Test rating is based on Outstanding performance in the State of Illinois and State of Indiana. FRSB demonstrated excellent 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 AAs, the bank's loan-to-deposit ratio is **reasonable**.

FRSB's quarterly LTD ratio averaged 58.8 percent over the 12-quarter period ending December 31, 2023. Over this period, the bank's quarterly LTD ratio ranged from 50.5 percent to 68.5 percent.

We analyzed the quarterly LTD ratios of three federal and state banks based on a combination of size, location, and lending opportunities. The banks ranged in asset size of \$50,864 million to \$484,129 million, with a combined average quarterly LTD ratio of 69.4 percent over the same evaluation period. The lowest individual quarterly average was 58.2 percent, while the highest individual quarterly average was 80.8 percent. FRSB ranked third amongst the group.

Lending in Assessment Area

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

FRSB originated and purchased 90 percent of its total loans sampled inside the bank's AA during the

evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

The table below shows the number and dollar volume of loans originated inside and outside the FRSB's AAs. This data is based on a random sample of 20 consumer and 20 home mortgage loans originated or purchased within the evaluation period made between January 1, 2021, and December 31, 2023.

| Lending Inside and Outside of the Assessment Area | | | | | | | | | | |
|--|------------------------|-------------|----------------|-------------|--------------|-------------------------------|-------------|----------------|-------------|------------------|
| Loan Category | Number of Loans | | | | Total | Dollar Amount of Loans | | | | Total |
| | Inside | | Outside | | | Inside | | Outside | | |
| | # | % | # | % | | \$ | % | \$ | % | |
| Consumer Loans | 19 | 95.0 | 1 | 5.0 | 20 | 292,127 | 97.9 | 6,150 | 2.1 | 298,277 |
| Home Mortgage Loans | 17 | 85.0 | 3 | 15.0 | 20 | 1,909,029 | 86.1 | 309,555 | 13.9 | 2,218,584 |
| Total | 36 | 90.0 | 4 | 10.0 | 40 | 2,201,156 | 87.5 | 315,705 | 12.5 | 2,516,861 |
| <i>Source: Sample of 20 consumer and 20 home mortgage loans originated between 1/1/2021 and 12/31/2023 Due to rounding, totals may not equal 100.0%</i> | | | | | | | | | | |

Description of Institution

First Robinson Savings Bank, National Association (FRSB) is a \$491.4 million (total assets) interstate financial institution headquartered in Robinson, Illinois (IL). The bank is wholly owned by First Robinson Financial Corporation, a one-bank holding company located in Robinson, Illinois. The bank is a full-service banking institution and operates three banking offices in Illinois, including Robinson, Palestine, and Oblong. There are two branches in Vincennes, Indiana (IN). The bank owns and operates four deposit-taking automated teller machines (ATMs) in IL, three of which are located at the branches. There are three deposit-taking ATMs in IN, none of which are located at a branch. They are located at Knox Plaza and 33 S 3rd St. in Vincennes, IN and outside 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, as well as online and mobile banking. The bank also offers fiduciary asset management, and retail non-deposit investment products.

As of December 31, 2023, the bank's loan portfolio totaled \$248.9 million, or 51.5 percent of total assets. Tier 1 capital was \$39.1 million. FRSB's mission is to be a be a community bank dedicated to equal, friendly, and quality service, with products and services designed to serve all segments of the community. 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.

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 AAs through its lending activities. The CD Test reflects an evaluation of FRSB's responsiveness to the CD needs of the AAs through loans, qualified investments, and services with a CD purpose. The evaluation period for this review is from January 1, 2021, through December 31, 2023.

Based on 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 45.9 percent of the number and 8.9 percent of the dollar volume of originations during the evaluation period. Home mortgage loans represent 31.2 percent of the number and 44.9 percent of the dollar volume of originations for the same period. As a result, we sampled consumer and home mortgage loans for this evaluation.

We performed two separate analyses during the evaluation period due to different demographic comparators. For consumer and mortgage lending activity in 2021, the OCC compared the bank's performance to the HMDA aggregate lender data as well as the 2015 American Community Survey (ACS) census data. For consumer and mortgage lending activity during 2022 and 2023, the OCC compared the bank's performance to the aggregate lender data and the 2020 census data.

Selection of Areas for Full-Scope Review

FRSB has two AAs, one in Crawford County, IL and one in Knox Count, IN. We completed a full-scope review of both AAs.

Ratings

The bank's overall rating is a blend of the state ratings, and where applicable, multistate 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 dollar and number volume of loan originations compared to the IN AA. Consumer loans originated in the AAs were 77.6 percent in the IL AA and 22.4 percent in the IN AA. Home mortgage loans originated in the AAs were 58.7 percent in the IL AA and 41.32 percent in the IN AA. We placed more weight on the distribution of loans by income level of the borrower test. During 2022 through 2023, 40.3 percent of the households in IL and 43.8 percent of households in Indiana were considered LMI. In contrast, only one geography, or 16.7 percent, of the CTs in Illinois and four geographies, or 36.4 percent, of the CTs in Indiana were considered LMI during the same timeframe. It is appropriate to note that the moderate-income CTs in the IN AA are surrounded 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 Illinois: Satisfactory

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Outstanding.

The major factors that support this rating include:

- FRSB's 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 outstanding performance in the State of Illinois. FRSB demonstrated excellent 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 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 CT, four middle-income CTs, and one upper-income CT in the AA.

Competition

Competition for deposits in the AA is moderate. According to the FDIC Deposit Market Share Report as of June 30, 2023, FRSB's deposits in the AA totaled \$260.3 million. FRSB ranked first out of six deposit-taking institutions in the AA with 42.7 percent market share. The depository banks with the second and third highest deposit market share are First National Bank in Olney with 20.3 percent of market share and First Financial Bank, National Association with 14.1 percent.

Demographics

The following tables provides a summary of demographic information for this AA.

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: Robinson IL AA – 2022 and 2023 | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 6 | 0.0 | 16.7 | 66.7 | 16.7 | 0.0 |
| Population by Geography | 18,679 | 0.0 | 15.4 | 69.1 | 15.6 | 0.0 |
| Housing Units by Geography | 8,680 | 0.0 | 16.1 | 66.9 | 17.0 | 0.0 |
| Owner-Occupied Units by Geography | 5,914 | 0.0 | 11.5 | 68.0 | 20.6 | 0.0 |
| Occupied Rental Units by Geography | 1,790 | 0.0 | 26.2 | 65.3 | 8.5 | 0.0 |
| Vacant Units by Geography | 976 | 0.0 | 25.7 | 63.5 | 10.8 | 0.0 |
| Businesses by Geography | 1,333 | 0.0 | 20.2 | 66.6 | 13.2 | 0.0 |
| Farms by Geography | 171 | 0.0 | 1.8 | 70.8 | 27.5 | 0.0 |
| Family Distribution by Income Level | 5,037 | 21.9 | 19.3 | 18.6 | 40.3 | 0.0 |
| Household Distribution by Income Level | 7,704 | 26.4 | 13.9 | 20.0 | 39.7 | 0.0 |
| Median Family Income Non-MSAs - IL | | \$68,958 | Median Housing Value | | | \$98,203 |
| | | | Median Gross Rent | | | \$684 |
| | | | Families Below Poverty Level | | | 8.0% |
| <i>Source: 2020 U.S. Census and 2023 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> | | | | | | |

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: Robinson IL AA – 2021 | | | | | | |
| 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 | 1,143 | 0.0 | 21.7 | 48.6 | 29.7 | 0.0 |
| Farms by Geography | 158 | 0.0 | 1.3 | 48.1 | 50.6 | 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 2021 D&B Data</i> | | | | | | |
| <i>Due to rounding, totals may not equal 100.0%</i> | | | | | | |
| <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

Within the IL AA, there are no geographies that are labeled as low-income and only one census tract considered to be a moderate-income area.

Population

During the 2021 evaluation period according to the 2015 ACS Census data, the area population was 19,541 with 3,032 (15.5 percent) residing in moderate-income CTs, 10,186 (52.1 percent) residing in middle-income CTs, and 6,323 (32.4 percent) residing in upper-income CTs. There were 7,620 households in the AA. The distribution of households by income level was 1,709 (22.4 percent) low income, 1,160 (15.2 percent) moderate income, 1,409 (18.5 percent) middle income, and 3,342 (43.9 percent) upper income.

During the 2022-2023 evaluation period according to the 2020 ACS Census data, the area population was 18,679 with 2,870 (15.4 percent) residing in moderate-income CTs, 12,899 (69.1 percent) residing in middle-income CTs, and 2,910 (15.6 percent) residing in upper-income CTs. There were 7,704 households in the AA. The distribution of households by income level was 2,032 (26.4 percent) low income, 1,074 (13.9 percent) moderate income, 1,538 (20.0 percent) middle income, and 3,060 (39.7 percent) upper income.

Employment and Economic Factors

According to the Bureau of Labor Statistics (BLS), unemployment rates in the AA are improving.

| Annual Unemployment Rates | | | | |
|---|-------------|-------------|-------------|-------------|
| Areas | 2021 | 2022 | 2023 | Peak |
| Crawford County | 5.2 | 4.3 | 4.0 | 6.9 |
| State of Illinois | 6.1 | 4.6 | 4.5 | 7.8 |
| National | 3.9 | 3.5 | 3.7 | 6.1 |
| <i>Source: U.S. Department of Labor; Bureau of Labor Statistics. Rates are not seasonally adjusted. National Unemployment rates are as of December 31 of each year. Peak is as of January 31, 2021.</i> | | | | |

Industries driving the Crawford economy include manufacturing followed by health care. There are several large employers located in the AA including Marathon Petroleum Corporation, Hershey Candy Company, and Dana Incorporated.

The percentage of families in the AA living below the poverty level is 8.6 percent.

Community Contact

The OCC performed one community contact that serves in the AA. The contact noted the local economy was improving with an increase in manufacturing jobs primarily from Hershey Co. The contact did not note any concerns with credit and banking needs not being met in the local area and all banks in the area properly meet the needs of the community and are proactive. It was noted there is always a window of opportunity for housing projects in the local area given the recent high demand. This allows banks in the area to offer programs enticing first time home buyers with a lower interest rate if possible.

Scope of Evaluation in Illinois

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

When evaluating the lending test, we gave more weight to home mortgages as they represent 45 percent of the total volume of loan originations and purchases, compared to 9 percent for consumer loans. The community contact also indicated there is a need for affordable housing in the area, which demonstrates there is opportunity for more home mortgage lending.

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 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.

In 2021, 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.

In 2022 through 2023, FRSB exhibits excellent geographic distribution of consumer loans in the AA. Lending in the moderate-income CTs exceeded 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.

In 2021, FRSB exhibits reasonable geographic distribution of home mortgage loans in the AA. Lending in the moderate-income CTs is near the demographic comparator for percent of owner-occupied housing units and below the aggregate. There are no low-income CTs in the AA.

In 2022 through 2023, FRSB exhibits reasonable geographic distribution of home mortgage loans in the AA. Lending in the moderate-income CTs is near the demographic comparator for percent of owner-occupied housing units and below the aggregate. There are no low-income CTs in the AA.

Lending Gap Analysis

The OCC analyzed FRSB's geographic lending patterns of consumer and home mortgage loans by mapping loan originations and purchases throughout the AA. We did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a **reasonable** distribution of loans to individuals of different income levels and 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.

In 2021, FRSB exhibits poor 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 is near the demographic comparator.

In 2022 through 2023, FRSB exhibits poor 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 is near 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.

In 2021, FRSB exhibits reasonable borrower distribution of home mortgage loans in the AA. Lending to low-income borrowers was near the aggregate lending in the AA and below the percentage of low-income families. Lending to moderate-income borrowers was near the percentage of moderate-income families in the AA and below the aggregate.

In 2022 through 2023, FRSB exhibits reasonable borrower distribution of home mortgage loans in the AA. Lending to low-income borrowers was near the aggregate lending in the AA and below the percentage of low-income families. Lending to moderate-income borrowers was near the percentage of moderate-income families in the AA.

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 **Outstanding**.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope the review, the bank exhibits **excellent** responsiveness to community development needs in the AA 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 CD in the bank's AA.

Number and Amount of Community Development Loans

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

| Community Development Loans | | | | |
|-----------------------------|------------|---------------|---------------|---------------|
| Assessment Area | Total | | | |
| | # | % of Total # | \$(000's) | % of Total \$ |
| IL AA | 224 | 86.5 | \$15,191 | 96.1 |
| Outside of AA | 35 | 13.5 | \$623 | 3.9 |
| Total | 259 | 100.0% | 15,814 | 100.0% |

Illinois AA

FRSB's level of CD lending provided **excellent** responsiveness to community credit needs in the AA. During the evaluation period, FRSB originated 224 CD loans totaling \$15.2 million, or 38.9 percent of tier 1 capital as of December 31, 2023. CD loans consisted of the following:

- 11 loans totaling \$1.2 million supported the purchase and/or renovation of single and multi-family rental properties, providing affordable housing for LMI individuals.
- Three loans totaling \$310 thousand to a local ambulance service benefitting LMI individuals.
- Two loans totaling \$157 thousand used to keep a grocery store in a TIF district open and operating.
- Four loans totaling \$1.3 million for the operation or construction of daycares benefitting LMI individuals that are supported by Project Child Grant from the State of Illinois.
- Six loans totaling \$4.7 million to a newly constructed truck washing facility that will create ten full-time local jobs for LMI individuals within a TIF district.
- Two loans totaling \$421 thousand to a local municipality for the construction new lots in a new subdivision and infrastructure within a TIF district.
- One loan for \$49 thousand to a non-profit organization providing community services.
- One loan for \$47 thousand to a local municipality benefitting LMI individuals for equipment financing.

- 168 loans totaling \$5.2 million were in PPP loans used to assist small businesses.
- \$1.8 million in 26 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.

Statewide/Regional

IFSLA also originated 35 PPP loans totaling \$623 thousand, within the state of Illinois, outside of its AAs.

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) |
| IL AA | 8 | \$4,451 | 193 | \$1,139 | 201 | 100.0 | \$5,590 | 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 adequate responsiveness to community needs in the AA. During the evaluation period, FRSB made four investments, 185 donations, and four grants totaling \$1.1 million which represents 2.9 percent of tier 1 capital as of December 31, 2023. There were also eight investments from the prior period that are outstanding as of the examination date. Those investments total \$4.5 million which represents 11.4 percent of capital.

FRSB received credit this period for investing \$925 thousand in four bonds used to acquire, establish, construct, develop, expand, extend, or further improve hospital facilities within the AA, which accept Medicaid and Medicare. The prior period investments were for a school district where the elementary school has 50 percent of the students on free and reduced lunches for the 2021-2024 school year.

FRSB provided 185 donations totaling \$174 thousand to organizations providing community services and affordable housing to LMI individuals, and economic improvements in these geographies located inside the AA.

FRSB also provided four Federal Home Loan Bank of Chicago Partnership Program (FHBC PP) grants totaling \$40,000 for down payment assistance to LMI individuals.

Extent to Which the Bank Provides Community Development Services

FRSB provided an **excellent** 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 in a moderate-income CT in Robinson, representing 20 percent of all bank branches.

During the evaluation period, 22 employees, consisting of directors, officers, and staff, provided community service, financial/technical expertise, and economic development hours to non-for-profit organizations, including holding leadership roles. Total hours during the evaluation period were 4,144 and benefitted 20 organizations primarily focusing on community service, providing financial education, and economic development to LMI individuals and improvements in moderate geographies. 21 employees were involved in leadership roles in 17 organizations.

State Rating

State of Indiana

CRA rating for the State of Indiana: Needs to Improve.

The Lending Test is rated: Needs to Improve.

The Community Development Test is rated: Outstanding.

The major factors that support this rating include:

- FRSB's 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 poor 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 outstanding performance in the State of Indiana. FRSB demonstrates excellent 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 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. In 2021, the bank's assessment area did not include any census tracts designated as low-income. However, because of updates to the 2020 Census data, one tract was added as low-income in 2022 and 2023. Additionally, there were three moderate-income CTs in 2021 which remained unchanged in 2022 and 2023 and four middle-income CTs in 2021, which increased to five in 2022 and 2023. Conversely, the number of upper-income CTs decreased from three in 2021 to two in 2022 and 2023. These changes reflect adjustments to census tract income designations and highlight the evolving demographic and economic landscape within the bank's assessment area.

Competition

Competition for deposits in the AA is moderate. According to the FDIC Market Share Report as of June 30, 2023, FRSB had \$100.3 million in deposits from within Knox County. FRSB ranked fifth out of nine deposit taking institutions with 12 percent market share for deposits in this county. The depository bank with the highest deposit market share is Old National Bank with 25.5 percent of market share.

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: Robinson IN AA – 2022 and 2023 | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 11 | 9.1 | 27.3 | 45.5 | 18.2 | 0.0 |
| Population by Geography | 36,282 | 8.0 | 21.8 | 44.4 | 25.9 | 0.0 |
| Housing Units by Geography | 17,155 | 7.0 | 25.2 | 45.8 | 22.0 | 0.0 |
| Owner-Occupied Units by Geography | 9,549 | 4.6 | 17.9 | 51.5 | 26.0 | 0.0 |
| Occupied Rental Units by Geography | 5,637 | 9.1 | 34.7 | 35.4 | 20.9 | 0.0 |
| Vacant Units by Geography | 1,969 | 12.5 | 33.7 | 47.5 | 6.3 | 0.0 |
| Businesses by Geography | 3,293 | 4.2 | 30.1 | 36.7 | 29.0 | 0.0 |
| Farms by Geography | 372 | 0.0 | 5.6 | 54.8 | 39.5 | 0.0 |
| Family Distribution by Income Level | 9,784 | 23.0 | 19.3 | 19.5 | 38.2 | 0.0 |
| Household Distribution by Income Level | 15,186 | 26.2 | 18.7 | 17.1 | 38.0 | 0.0 |
| Median Family Income Non-MSAs - IN | | \$67,032 | Median Housing Value | | | \$100,587 |
| | | | Median Gross Rent | | | \$677 |
| | | | Families Below Poverty Level | | | 12.3% |
| <i>Source: 2020 U.S. Census and 2023 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> | | | | | | |

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: Robinson IN AA - 2021 | | | | | | |
| 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 | 2,684 | 0.0 | 24.8 | 48.6 | 26.6 | 0.0 |
| Farms by Geography | 318 | 0.0 | 5.0 | 51.9 | 43.1 | 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 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

Population

During the 2021 evaluation period according to the 2015 ACS Census data, the area population was 38,062 with 0 residing in low-income CTs, 8,758 (23.0 percent) residing in moderate-income CTs, 18,259 (48.0 percent) residing in middle-income CTs, and 11,045 (29.0 percent) residing in upper-income CTs. There were 14,779 households in the AA. The distribution of households by income level was 3,855 (26.1 percent) low income, 2,616 (17.7 percent) moderate income, 2,512 (17.0 percent) middle income, and 5,796 (39.2 percent) upper income.

During the 2022-2023 evaluation period according to the 2020 ACS Census data, the area population was 36,282 with 2,906 (8.0 percent) residing in low-income CTs, 7,893 (21.8 percent) residing in moderate-income CTs, 16,093 (44.4 percent) residing in middle-income CTs, and 9,390 (25.9 percent) residing in upper-income CTs. There were 15,186 households in the AA. The distribution of households by income level was 3,974 (26.2 percent) low income, 2,847 (18.8 percent) moderate income, 2,598 (17.1 percent) middle income, and 5,767 (38.0 percent) upper income.

Employment and Economic Factors

According to the Bureau of Labor Statistics (BLS), unemployment rates in the AA improved from 2021 to 2022. As of December 2023, Knox County performed better than the state and national average unemployment rates in 2022 and 2023.

| Annual Unemployment Rates | | | | |
|---|-------------|-------------|-------------|-------------|
| Areas | 2021 | 2022 | 2023 | Peak |
| Knox County | 3.1 | 2.7 | 3.0 | 4.3 |
| State of Indiana | 3.0 | 3.3 | 3.5 | 4.7 |
| National | 3.9 | 3.5 | 3.7 | 6.1 |
| <i>Source: U.S. Department of Labor; Bureau of Labor Statistics. Rates are not seasonally adjusted. National Unemployment rates are as of December 31 of each year. Peak is as of January 31, 2021.</i> | | | | |

The largest industries in Knox County are manufacturing, health care, and retail trade. Top employers in the county include Good Samaritan Hospital and Futaba Indiana of America Corp.

The percentage of families in the AA living below the poverty level is 12.3 percent.

Community Contact

The OCC completed a community contact interview that serves the AA. The contact stated the local economy was improving given several recent housing and industrial projects, providing more housing units and jobs in the local area. It was noted that banking needs were being met in the community, however, improvement could be made by including more financing opportunities for start-up businesses in the area. The contact communicated there is a robust entrepreneurial program in Vincennes including mentoring and development for new businesses, but financing can be difficult if the business lacks financial history. It was also noted there are technical and housing assistance opportunities for local

banks to offer the community. Overall, the contact believes banks in the area make decisions for the betterment of the county.

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 **Needs to Improve**.

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 **poor**.

Distribution of Loans by Income Level of the Geography

FRSB exhibits **reasonable** geographic distribution of loans in the state of Indiana.

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.

In 2021, FRSB exhibits excellent geographic distribution of consumer loans in the AA. Lending in the moderate-income CTs exceeded the demographic comparator for percentage of households. There are no low-income CTs in the AA.

In 2022 through 2023, FRSB exhibits poor geographic distribution of consumer loans in the AA. Lending in both the low and moderate-income CTs is below the demographic comparators for percentage of households.

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.

In 2021, FRSB exhibits poor geographic distribution of home mortgage loans in the AA. Lending in the moderate-income CTs is below both the demographic and aggregate comparators for percentage of owner-occupied housing units.

In 2022 through 2023, FRSB exhibits excellent geographic distribution of home mortgage loans in the AA. There was no lending by the bank in the one low-income CT, which is below both the demographic and aggregate comparators. Lending in the moderate-income CTs exceeded both the demographic and aggregate comparators for percentage of owner-occupied housing units.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a **poor** 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.

In 2021, 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 exceeded the demographic comparator.

In 2022 through 2023, FRSB exhibits poor borrower distribution of consumer loans in the AA. There was no lending to low-income borrowers which was lower than the demographic comparator for percentage of households. Lending to moderate-income borrowers is below the demographic comparator.

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.

In 2021, FRSB exhibits poor borrower distribution of home mortgage loans in the AA. Lending to low-income borrowers was near the aggregate lending in the AA and below the percentage of low-income families. Lending to moderate-income borrowers was below both the aggregate lending and percentage of moderate-income families in the AA.

In 2022 through 2023, FRSB exhibits poor borrower distribution of home mortgage loans in the AA. Lending to low-income borrowers was below both the aggregate lending and percentage of low-income families in the AA. Lending to moderate-income borrowers was near the percentage of moderate-income families in the AA and below the aggregate.

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 **Outstanding**.

Conclusions for Area Receiving a Full-Scope Review

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

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 \$ |
| IN AA | 98 | 83.8% | \$4,099 | 81.9% |
| Outside of AA | 19 | 16.2% | \$906 | 18.1% |
| Total | 117 | 100.0% | \$5,005 | 100.0% |

Indiana AA

FRSB's level of CD lending provided **excellent** responsiveness to community credit needs in the AA. During the evaluation period, FRSB originated 98 CD loans totaling \$4.1 million, or 10.5 percent of tier 1 capital. CD loans consisted of the following:

- Three loans totaling \$80 thousand to a local municipality to purchase a lawn mower and municipality trucks benefitting LMI geographies.
- Five loans totaling \$409 thousand supported the purchase and/or renovation of single and multi-family rental properties, providing affordable housing for LMI individuals.
- One loan for \$10 thousand to a non-profit organization providing community services.
- 85 loans totaling \$3.2 million were in PPP loans used to assist small businesses.
- \$405 thousand in 4 loans to finance affordable housing in the AA for LMI families through the USDA Guaranteed Rural Development Housing Loan Program.

Statewide/Regional

IFSLA also originated 19 PPP loans totaling \$906 thousand, within the state of Indiana, outside of its AAs.

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) |
| IN AA | 6 | \$2,385 | 140 | \$144 | 146 | 100.0 | \$2,529 | 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 **adequate** responsiveness to community needs in the AA. During the evaluation period, FRSB made 139 donations, and one grant totaling \$144 thousand which represents 0.4 percent of tier 1 capital. There were also six investments from the prior period that are outstanding as of the examination date. Those investments total \$2.4 million which represents 5.9 percent of capital.

FRSB provided 139 donations totaling \$134 thousand to organizations providing community services and affordable housing to LMI individuals, and economic improvements in these geographies located inside the AA.

FRSB also provided one Federal Home Loan Bank of Chicago Partnership Program (FHBC PP) grant for \$10,000 for down payment assistance to an LMI individual.

Extent to Which the Bank Provides Community Development Services

FRSB provided an **excellent** responsiveness of level of CD services in the AA. The branch structure provides good accessibility to banking services in moderate-income CTs. There is one low-income CT and three moderate-income CTs in the AA. The bank operates two branches in Indiana, representing 40 percent of all bank branches.

During the evaluation period, 17 employees, consisting of directors, officers, and staff, provided community service, financial/technical expertise, and economic development hours to non-for-profit organizations, including holding leadership roles. Total hours during the evaluation period were 1,401.50 and benefitted 19 organizations primarily focusing on community service, providing financial education, and economic development to LMI individuals and improvements in moderate geographies.

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: | 01/01/2021 to 12/31/2023 | |
| 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) | | |
| | | |
| State | | |
| 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 | Outstanding | Satisfactory |
| State: | | | |
| Illinois | Satisfactory | Outstanding | Satisfactory |
| Indiana | Needs to Improve | Outstanding | Needs to Improve |

(*) 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.

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 O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2021 |
|--|---------------------------|-----------|------------|----------------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | |
| | # | \$ | % of Total | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate |
| Robinson IL AA | 20 | 2,268,966 | 100.0 | 221 | 0.0 | 0.0 | 0.0 | 15.6 | 15.0 | 18.6 | 47.7 | 50.0 | 57.0 | 36.7 | 35.0 | 24.4 | 0.0 | 0.0 | 0.0 |
| Robinson IN AA | 20 | 3,051,760 | 100.0 | 1,135 | 0.0 | 0.0 | 0.0 | 15.0 | 5.0 | 15.7 | 50.3 | 45.0 | 44.7 | 34.7 | 50.0 | 39.6 | 0.0 | 0.0 | 0.0 |

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

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2022-23 |
|--|---------------------------|-----------|------------|----------------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|-----------------------------------|--------------|-----------|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | |
| | # | \$ | % of Total | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate |
| Robinson IL AA | 20 | 1,899,439 | 100.0 | 167 | 0.0 | 0.00 | 0.0 | 11.5 | 10.0 | 22.2 | 68.0 | 55.0 | 68.3 | 20.6 | 35.0 | 9.6 | 0.0 | 0.0 | 0.0 |
| Robinson IN AA | 20 | 2,832,700 | 100.0 | 653 | 4.6 | 0.0 | 2.9 | 17.9 | 30.0 | 21.3 | 51.5 | 45.0 | 52.2 | 26.0 | 25.0 | 23.6 | 0.0 | 0.0 | 0.0 |

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.
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 P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower | | | | | | | | | | | | | | | | | | | 2021 |
|---|---------------------------|-----------|------------|----------------|----------------------|--------------|-----------|---------------------------|--------------|-----------|-------------------------|--------------|-----------|------------------------|--------------|-----------|--------------------------------|--------------|-----------|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Borrowers | | | Moderate-Income Borrowers | | | Middle-Income Borrowers | | | Upper-Income Borrowers | | | Not Available-Income Borrowers | | |
| | # | \$ | % of Total | Overall Market | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate |
| Robinson IL AA | 20 | 2,268,966 | 100.0 | 221 | 17.4 | 10.0 | 14.0 | 18.1 | 15.0 | 23.5 | 19.7 | 20.0 | 20.4 | 44.8 | 55.0 | 26.2 | 0.0 | 0.0 | 15.8 |
| Robinson IN AA | 20 | 3,051,760 | 100.0 | 1,135 | 19.2 | 5.0 | 9.2 | 18.5 | 10.0 | 21.6 | 22.0 | 15.0 | 22.0 | 40.3 | 70.0 | 29.0 | 0.0 | 0.0 | 18.2 |

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

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower | | | | | | | | | | | | | | | | | | | 2022-23 |
|---|---------------------------|-----------|------------|----------------|----------------------|--------------|-----------|---------------------------|--------------|-----------|-------------------------|--------------|-----------|------------------------|--------------|-----------|--------------------------------|--------------|-----------|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Borrowers | | | Moderate-Income Borrowers | | | Middle-Income Borrowers | | | Upper-Income Borrowers | | | Not Available-Income Borrowers | | |
| | # | \$ | % of Total | Overall Market | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate |
| Robinson IL AA | 20 | 1,899,439 | 100.0 | 167 | 21.9 | 15.0 | 16.2 | 19.3 | 15.0 | 30.5 | 18.6 | 25.0 | 28.7 | 40.3 | 45.0 | 12.6 | 0.0 | 0.0 | 12.0 |
| Robinson IN AA | 20 | 2,832,700 | 100.0 | 653 | 23.0 | 5.0 | 14.9 | 19.3 | 15.0 | 26.3 | 19.5 | 30.0 | 21.0 | 38.2 | 50.0 | 19.8 | 0.0 | 0.0 | 18.1 |

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.
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 | | | | | | | | | | | | | 2021 | |
|---|----------------------|---------|------------|-------------------|--------------|------------------------|--------------|----------------------|--------------|---------------------|--------------|-----------------------------|--------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Tracts | | Moderate-Income Tracts | | Middle-Income Tracts | | Upper-Income Tracts | | Not Available-Income Tracts | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| Robinson IL AA | 20 | 281,801 | 100.00 | 0.0 | 0.0 | 17.0 | 15.0 | 49.6 | 55.0 | 33.3 | 30.0 | 0.0 | 0.0 | |
| Robinson IN AA | 20 | 315,568 | 0.0 | 0.0 | 0.0 | 22.1 | 25.0 | 48.5 | 50.0 | 29.4 | 25.0 | 0.0 | 0.0 | |

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

| Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography | | | | | | | | | | | | | 2022-23 | |
|---|----------------------|---------|------------|-------------------|--------------|------------------------|--------------|----------------------|--------------|---------------------|--------------|-----------------------------|--------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Tracts | | Moderate-Income Tracts | | Middle-Income Tracts | | Upper-Income Tracts | | Not Available-Income Tracts | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| Robinson IL AA | 20 | 298,746 | 100.0 | 0.0 | 0.0 | 14.9 | 20.0 | 67.3 | 60.0 | 17.8 | 20.0 | 0.0 | 0.0 | |
| Robinson IN AA | 20 | 415,193 | 100.0 | 6.2 | 0.0 | 24.1 | 10.0 | 45.5 | 60.0 | 24.1 | 30.0 | 0.0 | 0.0 | |

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 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.

| Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower | | | | | | | | | | | | | 2021 | |
|---|----------------------|---------|------------|----------------------|--------------|---------------------------|--------------|-------------------------|--------------|------------------------|--------------|--------------------------------|--------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Borrowers | | Moderate-Income Borrowers | | Middle-Income Borrowers | | Upper-Income Borrowers | | Not Available-Income Borrowers | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| Robinson IL AA | 20 | 281,801 | 100.0 | 22.4 | 10.0 | 15.2 | 15.0 | 18.5 | 25.0 | 43.9 | 50.0 | 0.0 | 0.0 | |
| Robinson IN AA | 20 | 316,568 | 100.0 | 26.1 | 15.0 | 17.7 | 20.00 | 17.0 | 10.0 | 39.2 | 55.0 | 0.0 | 0.0 | |

*Source: 2015 ACS; 01/01/2021 - 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 | | | | | | | | | | | | | 2022-23 | |
|---|----------------------|---------|------------|----------------------|--------------|---------------------------|--------------|-------------------------|--------------|------------------------|--------------|--------------------------------|--------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Borrowers | | Moderate-Income Borrowers | | Middle-Income Borrowers | | Upper-Income Borrowers | | Not Available-Income Borrowers | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| Robinson IL AA | 20 | 298,746 | 100.0 | 26.4 | 5.0 | 13.9 | 10.0 | 20.0 | 15.0 | 39.7 | 70.0 | 0.0 | 0.0 | |
| Robinson IN AA | 20 | 415,193 | 100.0 | 26.2 | 0.0 | 18.7 | 10.0 | 17.1 | 15.0 | 38.0 | 75.0 | 0.0 | 0.0 | |

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 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.