



Date: March 31st, 2025

To: CRA Public File

From: Kassie Shomette, Lending Compliance Specialist

RE: Loans to Deposits 2024

December 2023

- Loans-to-Deposits 82.97%

March 2024

- Loans-to-Deposits 81.20%

June 2024

- Loans-to-Deposits 81.19%

September 2024

- Loans-to-Deposits 79.62%

December 2024

- Loans-to-Deposits 82.39%



Date: March 31st, 2025

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From: Kassie Shomette, Lending Compliance Specialist

RE: Facilities

April 19th, 2021

Portage Community Bank's 4th Branch was opened in Portage County at 4183 Tallmadge Rd. Rootstown, Ohio 44272

- Census Tract 6018.02

January 13th, 2020

Portage Community Bank's 3rd Branch was opened in Summit County at 140 Portage Trl. Cuyahoga Falls, Ohio 44221

- Census Tract 5204.00

July 1st, 2006

Portage Community Bank's 2nd Branch and only Mortgage Office were opened in Portage County at 1532 South Water St. Kent, Ohio 44240

- Census Tract 6014.00

July 1st, 1998

Portage Community Bank opened the Main office Branch in Portage County at 1311 E. Main St. Ravenna, Ohio 44266

- Census Tract 6008.00

Portage Community Bank has expanded Courier Services, which continues to serve clients in outlying market areas.



Date: March 31st, 2025

To: CRA Public File

From: Kassie Shomette, Lending Compliance Specialist

RE: Public Comments

Comments

- There have been no negative comments or CRA related complaints this year, and none dating back to the inception of the bank, July 1st, 1998.



ACCOUNT SERVICES

DIGITAL BANKING

- Bank anywhere, anytime from phone, laptop, or desktop
 - Monitor accounts and make payments, transfers, or deposits
 - Keep close track of your finances with My Footprint
-

TELEPHONE BANKING

- Save yourself time; access your bank anytime by dialing in
 - Access account information 24/7 via touchtone phone
 - Completely free for all PCB customers
-

DEBIT CARDS

- Make purchases anywhere Visa® is accepted, online or offline
- Safer and more convenient than cash or checks
- Easily withdraw funds from ATMs





BUSINESS SERVICES

BUSINESS DIGITAL BANKING

- Skip the trip to a branch — bank whenever, wherever
 - Conduct any number of banking activities right from your office
 - Stay on top of your business's finances with My Footprint
-

MERCHANT CARD SERVICES

- Provide additional payment options for your customers
 - Accept major credit and debit cards for increased versatility
 - Boost your bottom line and cut down on processing time
-

REMOTE DEPOSIT CAPTURE

- Simply sign, scan, then send checks to the bank for processing
 - Streamline check handling from multiple offices or locations
 - Reduce time and money spent on document preparation and transportation
-

ACH & WIRE SERVICES

- Make and receive vendor payments 24/7, electronically
 - Schedule one-time or recurring wire transfers
 - Increase your business's efficiency, accuracy, and security
-

SWEEP SERVICES

- Earn interest on your excess funds with automatic sweeps
 - Set a target checking balance on your account
 - Investment is safe; backed by U.S. agency securities
-

BUSINESS DEBIT CARDS

- Make purchases anywhere Visa® is accepted, online or offline
 - Safer and more convenient than cash or checks
 - Easily withdraw funds from ATMs
-

POSITIVE PAY

- Catch fraudulent activity before money leaves your account
 - Receive alerts when a mismatch occurs
 - Timely return of money should fraud occur
-

QUICKBOOKS

Using QuickBooks to keep track of your numbers? We work hand-in-hand with the popular software for seamless accounting.



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ADDITIONAL SERVICES

At Portage Community Bank (PCB) we're always working toward maintaining an environment of convenience for our customers. If you're seeking a particular service, the answer to your inquiry may be found below.

Direct Deposit

Direct deposit is easy, reliable, and secure! Have your paycheck, social security check, and more directly deposited to your account every month by simply signing up through the payroll department of the company that issues your check.

For social security recipients – we're happy to help you process the paperwork on-site should you have any questions.

Night Depository

No time to make it to the bank during normal business hours? No problem. Deposits and payments can be dropped off in the night depository boxes of our Ravenna, Kent and Cuyahoga Falls locations. Transactions put into the depository after 8:00 am will be processed the next business day.

Courier Services

PCB offers all business clients a deposit and payment courier service. Our PCB courier will come to your business to pick up your deposits, payments, and even bring a change order. It's a great way to save your business some valuable time.

Safe Deposit Boxes *

Keep your most valuable possessions safe and sound with a safe deposit box from PCB. We have a wide range of boxes available at budget-friendly prices to provide the peace of mind you deserve. Safe deposit boxes are available at both Ravenna and Kent Locations.

Sizes and cost per year:

- 3 x 5 - \$30.00 + tax per year
- 3 x 10 - \$50.00 + tax per year
- 5 x 10 - \$70.00 + tax per year
- 10 x 10 - \$100.00 + tax per year

* Contents are not insured or guaranteed by the bank, the FDIC, or by any other government agency.

Surcharge-Free ATMs

PCB is a member of Community Bank Exchange (COBE). This membership provides you with access to several area-wide ATM locations where no surcharge is applied. Visit surcharge-free ATM locations at any member bank in Portage County.

Other Member Banks and Locations include:

- Hometown Bank – in Brimfield, Kent and Ravenna, Ohio





COMPARE OUR ACCOUNTS

Most Popular

HIGH INTEREST

NEIGHBOR REWARDS CHECKING

[Learn More](#)

Features

- 4.00% APY* on balances up to \$25,000
- 4.00% to 1.38% APY on balances over \$25,000 depending on balance in account*
- 0.05% APY* if qualifications aren't met

Monthly Maintenance Fee

NONE

Refunds on ATM Withdrawal Fees

Up to \$20 monthly*

Free Online & Mobile Banking Access?

Yes

Free Debit Card?

Yes

Minimum Opening Deposit

NONE

CASH BACK

NEIGHBORS GIVE BACK CHECKING

[Learn More](#)

Features

- 3.00% cash back on debit card purchases*
- No category restrictions on purchases
- Earn up to \$108 cash back per year, \$9 per month

Monthly Maintenance Fee

NONE

Refunds on ATM Withdrawal Fees

Up to \$20 monthly*

Free Online & Mobile Banking Access? Yes
Free Debit Card? Yes
Minimum Opening Deposit NONE

THE ESSENTIALS

COMMUNITY PLUS CHECKING

[Learn More](#)

Features

- Includes all the essentials
- Unlimited free monthly transactions

Monthly Maintenance Fee NONE*

Refunds on ATM Withdrawal Fees No charge by PCB for withdrawals at non-bank owned ATMs**

Free Online & Mobile Banking Access? Yes

Free Debit Card? Yes

Minimum Opening Deposit NONE

VIEW ALL ACCOUNTS 

Neighbor Rewards Checking:

*APY=Annual Percentage Yield. APY is accurate as of 03/28/2025. **Neighbor Rewards Checking Disclosure:** If your daily balance is greater than zero but less than or equal to \$25,000.00 AND you meet the qualifications for this account, the interest rate paid on the balance greater than zero but less than or equal to \$25,000.00 will be 3.92%, with an Annual Percentage Yield of 4.00%. If your daily balance is equal to or greater than \$25,000.01 AND you meet the qualifications for the account, the interest rate paid on the balance equal to or greater than \$25,000.01 will be 0.50% and the Annual Percentage Yield for this tier will range from 4.00% - 1.38%, depending on the account balance. Base Rate: If you do not meet the qualifications for this account, the interest rate paid on the entire balance will be 0.05% with and Annual Percentage Yield of 0.05%. **Your interest rate and Annual Percentage Yield may change.** To qualify for Neighbor Rewards Checking interest rates and receive reimbursements on your ATM fee surcharges, you must perform the following during the monthly statement cycle: **Have a minimum of 12 check card (debit card) purchases post and settle per monthly statement cycle (not counting ATM transactions) and enroll in eStatements and receive your monthly account statement electronically.** When Neighbor Rewards Checking qualifications are not met, the interest rate paid on the entire balance will be at the base interest rate for the statement cycle and ATM fees will not be refunded. Statement cycle means the period of time for which Portage Community Bank provides a summary of the financial activities and transactions that post and settle to the account holder's account. Please note that transactions may take one or more banking days from the date the transaction is made to post and settle to an account. ATM withdrawals do not count as qualifying debit card transactions for the purpose of earning rewards, within this account.

** **ATM Refunds:** When monthly qualifications are met, domestic ATM fees will be reimbursed up to a maximum amount of \$20.00 in ATM Fee refunds per monthly statement cycle.

Neighbors Give Back Checking: *When monthly qualifications are met, you receive 3% cash back on debit card purchases that post and settle to your account during monthly qualification cycle up to a total cash back of \$9 per monthly qualification cycle. Transactions may take one or more banking days from the date transaction was made to post to and settle to an account. ATM-withdrawals do not count as qualifying debit card transactions for purposes of earning rewards within this account. **Domestic ATM fees incurred during qualification cycle will be reimbursed up to \$20 if qualifications are met within monthly qualification cycle. Limit one account per SSN.

Community Plus Checking:

** You may still be subject to charges from the bank whose ATM you're using.



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CREDIT CARDS

PERSONAL VISA CREDIT CARDS

- Enjoy competitive rates and no annual fees
 - Variety of card programs available, from rewards to travel perks
 - Cards are secure and easily replaced if lost or stolen
-

BUSINESS VISA CREDIT CARDS

- Access competitive rates, no annual fees, and redeemable rewards points
- Employee cards available
- Make purchases conveniently anywhere Visa® is accepted





PERSONAL LOANS

HOME MORTGAGE LOANS

- Competitive rates for home purchase, refinance, or construction
 - Variety of financing programs, each customized to your situation
 - Pre-approval and refinancing available
-

HOME EQUITY LOANS

- Convert the equity in your home into affordable financing
 - Competitive rates for several short-term or ongoing needs
 - Home equity lines of credit (HELOC) also available
-

AUTO LOANS

- Competitive, fixed and variable rates on new or used vehicles
 - A wide range of terms customized to your unique situation
 - Quick, local decision-making and processing
-

PERSONAL TERM LOANS

- Fund almost any dream, goal, or plan affordably
- Competitive rates for a wide variety of personal needs
- Repayment terms customized to fit your unique situation





PERSONAL SAVINGS

NEIGHBOR REWARDS SAVINGS

- Available to all customers with a Neighbor Rewards Checking account
 - 1.01% to 0.36% APY* on balances over \$25,000 depending on balance in account
 - No monthly service fee; no minimum balance requirements
-

LIT'L PEOPLES SAVINGS ACCOUNT

- Teach your child the importance of saving at an early age
 - Earn competitive interest on the balance
 - No monthly service fee for customers under 18 years old¹
-

COMMUNITY STATEMENT SAVINGS

- Steadily save for an unexpected expense or future purchase
 - Earn competitive interest on your entire balance
 - No minimum deposit required to open
-

COMMUNITY INDEX MONEY MARKET

- Competitive, tiered rates – higher balances earn higher rates
 - Maintain access to your funds
 - No minimum deposit required to open
-

CERTIFICATES OF DEPOSIT (CDS)

- Get a guaranteed return with rates that surpass regular savings
 - Wide range of terms available
 - No setup or maintenance fees required
-

INDIVIDUAL RETIREMENT ACCOUNTS (IRAS)

- Earn competitive interest above standard savings rates
 - Traditional and Roth IRA options available
 - No setup or maintenance fees required
-

HEALTH SAVINGS ACCOUNTS (HSAS)

- Save up for future healthcare expenses
- Earn interest on your balance and access tax savings
- Unused funds remain in account year after year



BUSINESS LOANS

COMMERCIAL REAL ESTATE LOANS

- Competitive rates for the purchase, refinance, or construction of commercial properties
 - Repayment terms customized to fit your business's unique needs
 - Lending professionals with working knowledge of the local real estate market
-

EQUIPMENT LOANS

- Competitive rates for new or used equipment
 - Customized terms, centered around your business's situation
 - Meet demands without cutting into working capital or savings
-

BUSINESS LINES OF CREDIT

- Competitive rates for a wide range of long-term or seasonal business needs
 - Repayment customized based on your business's unique needs
 - Revolving credit – as principal is repaid, more becomes available for use
-

BUSINESS TERM LOANS

- Competitive rates for a wide range of business expenses
 - Repayment terms customized to fit your business's unique needs
 - Quick, local decision-making and processing
-

SMALL BUSINESS ADMINISTRATION (SBA) LOANS

- Government-assisted financing for small businesses
- Competitive rates available for a wide range of business needs
- Includes lower down payments and extended terms





BUSINESS SAVINGS

COMMUNITY BUSINESS STATEMENT SAVINGS

- Build a cash cushion for future expenses
 - Earn competitive interest on entire balance
 - No minimum deposit required to open
-

COMMUNITY BUSINESS MONEY MARKET ACCOUNT

- Earn competitive, tiered rates — higher balances earn higher rates
 - Enjoy flexibility with enhanced access to funds, including direct check writing
 - No minimum deposit required to open
-

BUSINESS CERTIFICATES OF DEPOSIT (CDS)

- Provides a guaranteed return; less risky compared to other investment options
- Includes fixed rates and a wide range of terms
- No setup or maintenance fees required





LOCATIONS & HOURS

We'd love to see you in person! Please feel free to drop into any branch location near you.



Ravenna Office

Map ATM



Address

1311 East Main Street
Ravenna, OH 44266

[See Location Details](#)

[Get Directions](#)

Phone: (330) 296-8090

Fax: (330) 296-6082

Lobby Hours

Mon-Thur: 9:00am - 4:00pm

Fri: 9:00am - 5:00pm

Sat: 9:00am - 12:00pm

Drive Thru Hours

Mon-Thur: 8:30am - 5:00pm

Fri: 8:30am - 6:00pm

Sat: 8:30am - 12:00pm

Kent Office

Map ATM

**Address**

1532 South Water Street
Kent, OH 44240

[See Location Details](#)

[Get Directions](#)

Phone: (330) 678-8080

Fax: (330) 678-8015

Lobby Hours

Mon-Thur: 9:00am - 4:00pm

Fri: 9:00am - 5:00pm

Sat: 9:00am - 12:00pm

Drive Thru Hours

Mon-Thur: 8:30am - 5:00pm

Fri: 8:30am - 6:00pm

Sat: 8:30am - 12:00pm

Cuyahoga Falls Office

Map ATM

**Address**

140 Portage Trail
Cuyahoga Falls, OH 44221

[See Location Details](#)

[Get Directions](#)

Phone: (330) 400-5010

Fax: (330) 400-5011

Lobby Hours

Mon-Thur: 9:00am - 4:00pm

Fri: 9:00am - 5:00pm

Sat: 9:00am - 12:00pm

Drive Thru Hours

Mon-Thur: 8:30am - 5:00pm

Fri: 8:30am - 6:00pm

Sat: 8:30am - 12:00pm

Rootstown Office

Map ATM



Address

4183 Tallmadge Road
Rootstown, OH 44272

[See Location Details](#)

[Get Directions](#)

Phone: (330) 325-1726

Fax: (330) 578-9018

Lobby Hours

Mon-Thur: 9:00am - 4:00pm

Fri: 9:00am - 5:00pm

Sat: 9:00am - 12:00pm

Drive Thru Hours

Mon-Thur: 8:30am - 5:00pm

Fri: 8:30am - 6:00pm

Sat: 8:30am - 12:00pm

Mortgage Loan Office

Map

Address

1530 S. Water Street
Kent, OH 44240

[See Location Details](#)

[Get Directions](#)

Phone: (330) 346-0380

Fax: (330) 346-0780

Lobby Hours

Mon-Fri: 9:00am - 5:00pm



2023 FFIEC Census Report - Summary Census Demographic Information

State: 39 - OHIO (OH)

County: 133 - PORTAGE COUNTY

Tract: All Tracts



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
39	133	6001.02	Middle	No	114.11	\$95,500	\$108,975	\$87,692	3392	11.97	406	960	1132
39	133	6001.03	Middle	No	99.14	\$95,500	\$94,679	\$76,185	5550	6.59	366	1829	2176
39	133	6002.00	Middle	No	85.30	\$95,500	\$81,462	\$65,551	5577	7.30	407	1746	2362
39	133	6003.02	Upper	No	167.42	\$95,500	\$159,886	\$128,651	7383	9.33	689	2422	2600
39	133	6003.03	Upper	No	175.35	\$95,500	\$167,459	\$134,750	5444	17.58	957	1259	1757
39	133	6003.04	Upper	No	162.72	\$95,500	\$155,398	\$125,038	4412	12.78	564	1227	1556
39	133	6004.01	Middle	No	116.17	\$95,500	\$110,942	\$89,271	6887	24.87	1713	1664	2110
39	133	6004.02	Upper	No	131.21	\$95,500	\$125,306	\$100,828	5505	16.82	926	1534	1693
39	133	6004.03	Middle	No	82.28	\$95,500	\$78,577	\$63,229	5085	16.95	862	1711	1989
39	133	6005.00	Middle	No	96.66	\$95,500	\$92,310	\$74,278	5245	8.12	426	1760	2188
39	133	6006.02	Moderate	No	78.84	\$95,500	\$75,292	\$60,585	2649	6.72	178	729	1115
39	133	6006.03	Moderate	No	67.62	\$95,500	\$64,577	\$51,964	3450	11.65	402	956	1312
39	133	6007.03	Middle	No	91.29	\$95,500	\$87,182	\$70,150	1735	9.86	171	636	805
39	133	6007.04	Middle	No	102.07	\$95,500	\$97,477	\$78,438	1648	6.86	113	579	638
39	133	6007.05	Middle	No	111.54	\$95,500	\$106,521	\$85,714	2351	5.49	129	901	1001
39	133	6007.06	Upper	No	122.97	\$95,500	\$117,436	\$94,500	2780	5.83	162	1003	1216
39	133	6008.00	Moderate	No	72.50	\$95,500	\$69,238	\$55,714	3235	14.81	479	662	1081
39	133	6009.01	Moderate	No	60.55	\$95,500	\$57,825	\$46,535	3859	20.65	797	940	1547
39	133	6009.02	Moderate	No	78.62	\$95,500	\$75,082	\$60,417	5694	17.79	1013	1279	2345
39	133	6010.00	Moderate	No	66.28	\$95,500	\$63,297	\$50,938	2459	22.65	557	616	1030
39	133	6011.00	Middle	No	80.78	\$95,500	\$77,145	\$62,075	5056	8.11	410	2223	2584
39	133	6012.00	Middle	No	82.75	\$95,500	\$79,026	\$63,587	4536	23.28	1056	704	1813
39	133	6013.00	Upper	No	137.47	\$95,500	\$131,284	\$105,637	6318	20.58	1300	2340	2846
39	133	6014.00	Moderate	No	71.09	\$95,500	\$67,891	\$54,627	4269	22.32	953	874	1915
39	133	6015.01	Middle	No	94.34	\$95,500	\$90,095	\$72,500	2122	20.03	425	301	809
39	133	6015.02	Unknown	No	0.00	\$95,500	\$0	\$0	7391	29.79	2202	0	32

* Will automatically be included in the 2024 Distressed or Underserved Tract List

State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
39	133	6015.03	Moderate	No	67.10	\$95,500	\$64,081	\$51,563	4839	21.55	1043	529	1007
39	133	6016.00	Middle	No	115.30	\$95,500	\$110,112	\$88,600	4069	11.40	464	1244	1550
39	133	6017.02	Middle	No	108.74	\$95,500	\$103,847	\$83,558	5779	10.92	631	1719	2141
39	133	6017.03	Middle	No	117.82	\$95,500	\$112,518	\$90,538	3561	19.46	693	609	797
39	133	6017.04	Middle	No	116.44	\$95,500	\$111,200	\$89,479	3246	15.65	508	1057	1387
39	133	6018.01	Middle	No	118.20	\$95,500	\$112,881	\$90,833	4060	10.10	410	1017	1449
39	133	6018.02	Middle	No	114.33	\$95,500	\$109,185	\$87,861	4542	10.59	481	1298	1565
39	133	6019.01	Middle	No	94.07	\$95,500	\$89,837	\$72,292	2564	7.22	185	731	1032
39	133	6019.02	Middle	No	108.48	\$95,500	\$103,598	\$83,365	2838	7.58	215	911	1664
39	133	6020.00	Middle	No	99.28	\$95,500	\$94,812	\$76,289	5276	6.33	334	1816	2012
39	133	6021.01	Middle	No	86.17	\$95,500	\$82,292	\$66,216	3723	5.24	195	1296	1603
39	133	6021.02	Middle	No	98.59	\$95,500	\$94,153	\$75,764	3262	5.98	195	1227	1639

* Will automatically be included in the 2024 Distressed or Underserved Tract List

2023 FFIEC Census Report - Summary Census Demographic Information

State: 39 - OHIO (OH)

County: 153 - SUMMIT COUNTY



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
39	153	5011.00	Unknown	No	0.00	\$95,500	\$0	\$0	1730	64.68	1119	122	454
39	153	5017.00	Low	No	48.17	\$95,500	\$46,002	\$37,016	1146	40.58	465	46	371
39	153	5018.00	Low	No	45.43	\$95,500	\$43,386	\$34,914	881	93.19	821	77	328
39	153	5019.00	Low	No	17.80	\$95,500	\$16,999	\$13,681	2245	81.65	1833	259	608
39	153	5021.01	Moderate	No	70.43	\$95,500	\$67,261	\$54,125	3356	64.72	2172	490	1066
39	153	5021.02	Middle	No	80.00	\$95,500	\$76,400	\$61,475	4808	58.90	2832	537	1418
39	153	5022.00	Low	No	47.40	\$95,500	\$45,267	\$36,424	6294	60.03	3778	1117	2620
39	153	5023.00	Moderate	No	62.81	\$95,500	\$59,984	\$48,269	5206	54.03	2813	1511	2450
39	153	5025.00	Moderate	No	52.25	\$95,500	\$49,899	\$40,152	1027	48.20	495	229	493
39	153	5026.00	Moderate	No	50.05	\$95,500	\$47,798	\$38,462	2977	39.07	1163	501	1420
39	153	5027.00	Moderate	No	79.11	\$95,500	\$75,550	\$60,793	6421	26.48	1700	1932	2814
39	153	5028.00	Moderate	No	72.47	\$95,500	\$69,209	\$55,691	4071	23.26	947	1040	1834
39	153	5031.00	Low	No	40.57	\$95,500	\$38,744	\$31,176	1530	56.99	872	247	818
39	153	5032.00	Low	No	48.36	\$95,500	\$46,184	\$37,167	1473	77.39	1140	295	701
39	153	5033.00	Low	No	49.77	\$95,500	\$47,530	\$38,250	5396	56.62	3055	933	2422
39	153	5034.00	Moderate	No	57.23	\$95,500	\$54,655	\$43,981	1319	87.19	1150	164	642
39	153	5035.00	Moderate	No	63.31	\$95,500	\$60,461	\$48,654	3483	67.59	2354	988	1509
39	153	5036.00	Moderate	No	57.53	\$95,500	\$54,941	\$44,212	4152	20.13	836	956	1716
39	153	5037.01	Middle	No	110.79	\$95,500	\$105,804	\$85,134	5539	14.77	818	1876	2272
39	153	5037.02	Middle	No	80.90	\$95,500	\$77,260	\$62,167	5482	12.13	665	1622	2330
39	153	5038.00	Moderate	No	50.99	\$95,500	\$48,695	\$39,184	3783	49.27	1864	647	1254
39	153	5041.00	Moderate	No	78.45	\$95,500	\$74,920	\$60,288	929	36.17	336	74	495
39	153	5042.00	Low	No	44.19	\$95,500	\$42,201	\$33,958	1577	47.94	756	138	751
39	153	5044.00	Low	No	39.46	\$95,500	\$37,684	\$30,329	1219	61.94	755	150	552
39	153	5045.00	Moderate	No	55.45	\$95,500	\$52,955	\$42,609	1669	50.15	837	317	827
39	153	5046.00	Moderate	No	53.02	\$95,500	\$50,634	\$40,744	3257	57.69	1879	628	1325

* Will automatically be included in the 2024 Distressed or Underserved Tract List

State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
39	153	5047.00	Moderate	No	70.50	\$95,500	\$67,328	\$54,178	4334	38.90	1686	1215	2031
39	153	5048.00	Moderate	No	55.25	\$95,500	\$52,764	\$42,460	4675	25.01	1169	1686	2343
39	153	5052.00	Low	No	40.79	\$95,500	\$38,954	\$31,346	1247	67.44	841	310	681
39	153	5053.00	Low	No	40.66	\$95,500	\$38,830	\$31,250	1487	71.15	1058	135	482
39	153	5054.00	Moderate	No	67.15	\$95,500	\$64,128	\$51,607	3614	38.54	1393	974	1669
39	153	5055.00	Low	No	45.71	\$95,500	\$43,653	\$35,125	2560	36.02	922	582	1217
39	153	5056.00	Low	No	42.22	\$95,500	\$40,320	\$32,444	1134	51.94	589	199	571
39	153	5057.00	Moderate	No	76.78	\$95,500	\$73,325	\$59,006	2673	34.87	932	573	1392
39	153	5058.00	Moderate	No	60.00	\$95,500	\$57,300	\$46,111	4579	22.69	1039	1149	1959
39	153	5059.00	Moderate	No	59.76	\$95,500	\$57,071	\$45,924	2376	20.75	493	673	1236
39	153	5061.00	Middle	No	98.98	\$95,500	\$94,526	\$76,063	5221	41.06	2144	1205	2143
39	153	5062.00	Moderate	No	74.74	\$95,500	\$71,377	\$57,434	3679	80.35	2956	1187	1826
39	153	5064.00	Middle	No	87.37	\$95,500	\$83,438	\$67,143	2801	38.02	1065	786	1438
39	153	5065.00	Low	No	42.75	\$95,500	\$40,826	\$32,857	2596	85.44	2218	417	1163
39	153	5066.00	Low	No	40.70	\$95,500	\$38,869	\$31,280	2195	47.24	1037	269	1025
39	153	5067.00	Low	No	43.59	\$95,500	\$41,628	\$33,500	1598	92.24	1474	241	647
39	153	5068.00	Low	No	38.88	\$95,500	\$37,130	\$29,881	2196	63.48	1394	92	500
39	153	5071.01	Middle	No	94.22	\$95,500	\$89,980	\$72,402	5003	41.20	2061	1431	2109
39	153	5071.02	Upper	No	138.99	\$95,500	\$132,735	\$106,806	2795	18.82	526	1095	1205
39	153	5072.01	Middle	No	114.64	\$95,500	\$109,481	\$88,098	2497	46.18	1153	972	1052
39	153	5072.02	Upper	No	125.10	\$95,500	\$119,471	\$96,136	3436	17.14	589	1301	1397
39	153	5072.03	Upper	No	139.05	\$95,500	\$132,793	\$106,853	4478	24.50	1097	1336	1505
39	153	5073.00	Middle	No	84.12	\$95,500	\$80,335	\$64,643	3107	20.34	632	850	1161
39	153	5074.00	Middle	No	86.48	\$95,500	\$82,588	\$66,458	928	57.44	533	197	431
39	153	5075.01	Moderate	No	68.17	\$95,500	\$65,102	\$52,386	2056	41.25	848	247	405
39	153	5075.02	Low	No	45.50	\$95,500	\$43,453	\$34,968	4479	73.36	3286	637	1777
39	153	5076.00	Low	No	45.68	\$95,500	\$43,624	\$35,104	4506	44.05	1985	1164	2006
39	153	5080.00	Moderate	No	64.29	\$95,500	\$61,397	\$49,402	5345	25.46	1361	1127	1312
39	153	5083.01	Unknown	No	0.00	\$95,500	\$0	\$0	1368	52.12	713	122	374

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State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
39	153	5083.99	Moderate	No	50.04	\$95,500	\$47,788	\$38,453	4351	66.86	2909	603	1388
39	153	5086.00	Moderate	No	54.06	\$95,500	\$51,627	\$41,548	2816	89.35	2516	606	1144
39	153	5088.00	Low	No	47.40	\$95,500	\$45,267	\$36,427	5362	92.22	4945	1538	2760
39	153	5089.00	Unknown	No	0.00	\$95,500	\$0	\$0	4291	34.33	1473	44	549
39	153	5090.00	Moderate	No	51.04	\$95,500	\$48,743	\$39,222	1388	53.39	741	189	720
39	153	5101.00	Low	No	39.00	\$95,500	\$37,245	\$29,976	2711	19.77	536	338	1186
39	153	5102.00	Middle	No	82.12	\$95,500	\$78,425	\$63,103	3992	13.80	551	1188	1790
39	153	5103.01	Low	No	47.81	\$95,500	\$45,659	\$36,743	5110	31.70	1620	826	1741
39	153	5103.02	Middle	No	100.93	\$95,500	\$96,388	\$77,564	5702	11.52	657	2079	2710
39	153	5104.00	Moderate	No	66.76	\$95,500	\$63,756	\$51,306	3715	9.61	357	1104	1688
39	153	5105.00	Moderate	No	75.21	\$95,500	\$71,826	\$57,800	4065	10.09	410	1113	1825
39	153	5201.03	Moderate	No	63.89	\$95,500	\$61,015	\$49,096	2051	26.67	547	454	848
39	153	5201.04	Middle	No	91.89	\$95,500	\$87,755	\$70,612	4392	18.94	832	915	1392
39	153	5201.05	Middle	No	90.41	\$95,500	\$86,342	\$69,474	4196	16.87	708	1095	1364
39	153	5201.06	Middle	No	87.66	\$95,500	\$83,715	\$67,361	2707	23.01	623	289	788
39	153	5202.01	Middle	No	97.45	\$95,500	\$93,065	\$74,883	2669	9.48	253	988	1294
39	153	5202.02	Middle	No	83.95	\$95,500	\$80,172	\$64,513	4667	15.23	711	1212	1644
39	153	5203.01	Middle	No	100.72	\$95,500	\$96,188	\$77,399	3385	13.56	459	1153	1255
39	153	5203.02	Middle	No	111.65	\$95,500	\$106,626	\$85,795	3486	12.39	432	1208	1583
39	153	5204.00	Middle	No	111.60	\$95,500	\$106,578	\$85,757	4505	11.21	505	1324	1934
39	153	5205.00	Middle	No	94.05	\$95,500	\$89,818	\$72,275	4362	13.39	584	1303	1864
39	153	5206.00	Upper	No	128.21	\$95,500	\$122,441	\$98,523	3663	17.23	631	1130	1496
39	153	5301.01	Upper	No	169.81	\$95,500	\$162,169	\$130,486	7358	33.13	2438	2178	2368
39	153	5301.03	Upper	No	133.68	\$95,500	\$127,664	\$102,724	4700	27.40	1288	1570	1794
39	153	5301.04	Middle	No	115.84	\$95,500	\$110,627	\$89,020	7599	28.62	2175	2463	2721
39	153	5301.05	Upper	No	125.59	\$95,500	\$119,938	\$96,506	2814	43.25	1217	672	787
39	153	5301.08	Upper	No	162.08	\$95,500	\$154,786	\$124,549	4805	35.30	1696	1294	1484
39	153	5304.01	Upper	No	128.34	\$95,500	\$122,565	\$98,621	3330	11.86	395	994	1266

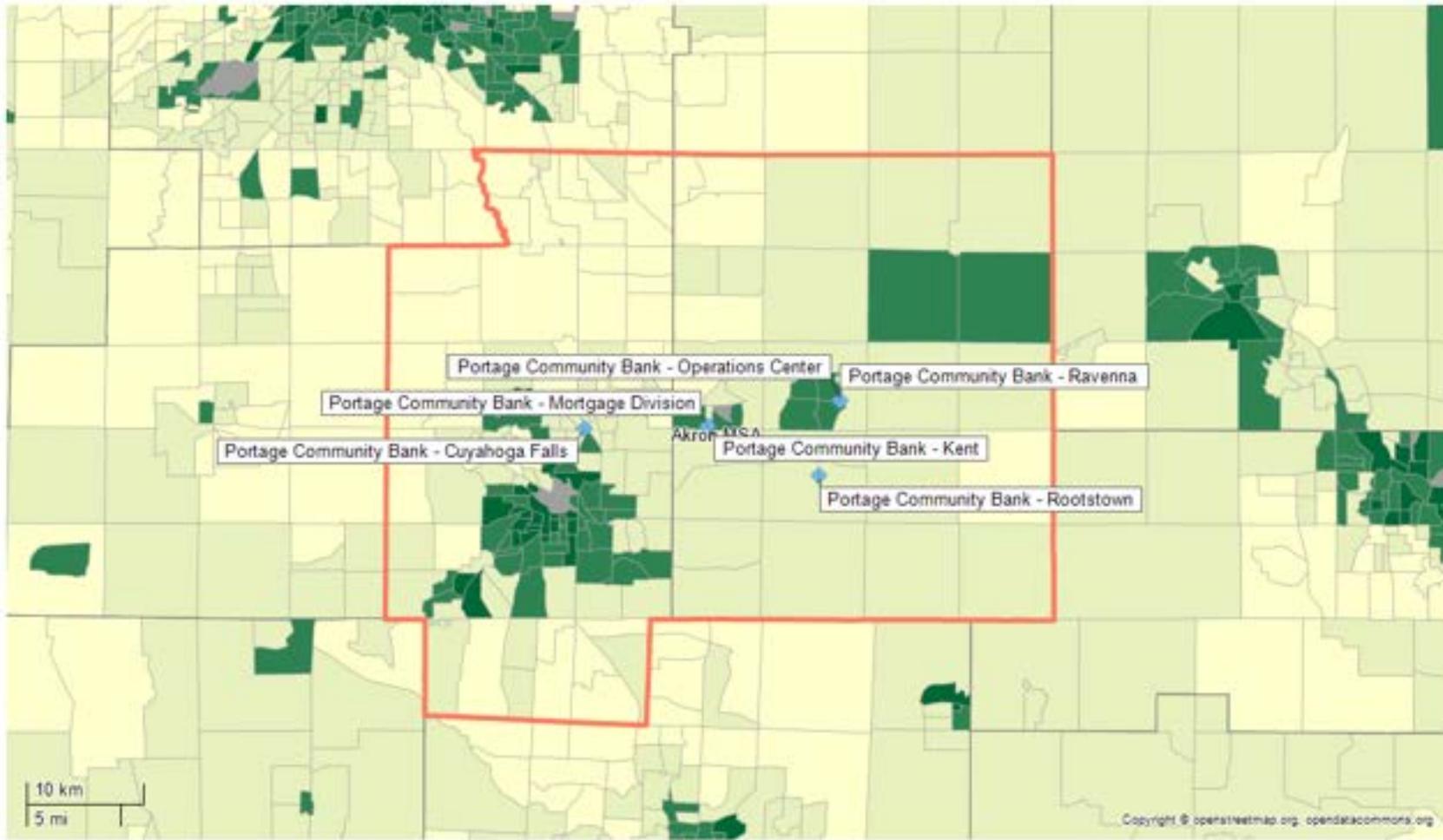
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State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
39	153	5304.02	Middle	No	87.84	\$95,500	\$83,887	\$67,500	3606	18.05	651	838	1353
39	153	5305.01	Middle	No	112.24	\$95,500	\$107,189	\$86,250	5134	11.59	595	1809	2466
39	153	5305.02	Upper	No	134.03	\$95,500	\$127,999	\$102,994	3245	12.27	398	999	1044
39	153	5306.03	Middle	No	89.38	\$95,500	\$85,358	\$68,688	4617	17.24	796	758	1344
39	153	5306.04	Upper	No	160.74	\$95,500	\$153,507	\$123,523	3385	9.34	316	1180	1348
39	153	5306.05	Upper	No	144.19	\$95,500	\$137,701	\$110,801	5607	14.11	791	1583	1780
39	153	5306.06	Upper	No	149.04	\$95,500	\$142,333	\$114,531	5559	10.04	558	1780	2030
39	153	5307.00	Upper	No	176.70	\$95,500	\$168,749	\$135,785	2516	8.19	206	899	1059
39	153	5308.00	Middle	No	114.06	\$95,500	\$108,927	\$87,649	6655	11.93	794	2135	2232
39	153	5309.01	Middle	No	99.71	\$95,500	\$95,223	\$76,621	4699	23.66	1112	1296	1643
39	153	5309.02	Middle	No	112.33	\$95,500	\$107,275	\$86,322	6476	11.15	722	2096	2358
39	153	5309.03	Middle	No	113.87	\$95,500	\$108,746	\$87,500	5328	9.61	512	1679	1811
39	153	5310.01	Middle	No	96.91	\$95,500	\$92,549	\$74,468	3767	10.17	383	1071	1334
39	153	5310.02	Moderate	No	77.04	\$95,500	\$73,573	\$59,200	5414	11.34	614	2283	2760
39	153	5311.01	Moderate	No	77.89	\$95,500	\$74,385	\$59,853	2840	10.92	310	1049	1549
39	153	5311.02	Middle	No	105.94	\$95,500	\$101,173	\$81,413	4216	8.14	343	1474	1720
39	153	5311.03	Middle	No	90.28	\$95,500	\$86,217	\$69,375	2976	13.44	400	1194	1422
39	153	5314.05	Upper	No	127.84	\$95,500	\$122,087	\$98,235	4642	13.87	644	1250	1629
39	153	5314.06	Upper	No	122.41	\$95,500	\$116,902	\$94,066	5368	11.70	628	1360	1630
39	153	5314.07	Upper	No	124.21	\$95,500	\$118,621	\$95,446	2914	8.10	236	844	1001
39	153	5315.01	Upper	No	142.27	\$95,500	\$135,868	\$109,327	4222	10.09	426	1062	1450
39	153	5315.02	Upper	No	152.20	\$95,500	\$145,351	\$116,957	4367	9.87	431	1256	1694
39	153	5316.01	Middle	No	112.04	\$95,500	\$106,998	\$86,100	4205	6.44	271	1422	1924
39	153	5316.02	Middle	No	104.13	\$95,500	\$99,444	\$80,019	3097	6.17	191	1023	1217
39	153	5317.01	Middle	No	101.46	\$95,500	\$96,894	\$77,969	3986	8.43	336	1537	1738
39	153	5317.02	Upper	No	139.02	\$95,500	\$132,764	\$106,833	4124	6.89	284	1445	1662
39	153	5318.01	Moderate	No	76.67	\$95,500	\$73,220	\$58,920	4772	11.46	547	1556	2271
39	153	5318.02	Middle	No	99.59	\$95,500	\$95,108	\$76,532	4429	12.60	558	1301	1811
39	153	5320.01	Middle	No	95.90	\$95,500	\$91,585	\$73,692	3707	8.07	299	1254	1597

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State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
39	153	5320.03	Middle	No	102.64	\$95,500	\$98,021	\$78,878	4178	6.56	274	1414	1703
39	153	5320.04	Upper	No	123.63	\$95,500	\$118,067	\$95,000	3782	11.32	428	1309	1560
39	153	5322.02	Middle	No	110.27	\$95,500	\$105,308	\$84,736	6608	24.00	1586	2541	2886
39	153	5323.01	Upper	No	186.77	\$95,500	\$178,365	\$143,523	5879	10.94	643	1910	2157
39	153	5323.02	Upper	No	163.97	\$95,500	\$156,591	\$126,000	5866	12.58	738	1678	1948
39	153	5325.01	Upper	No	185.12	\$95,500	\$176,790	\$142,250	3242	7.96	258	1011	1098
39	153	5325.02	Upper	No	163.87	\$95,500	\$156,496	\$125,926	3195	11.42	365	1245	1446
39	153	5326.00	Upper	No	154.09	\$95,500	\$147,156	\$118,409	2803	10.13	284	853	1141
39	153	5327.01	Upper	No	166.43	\$95,500	\$158,941	\$127,891	8077	28.95	2338	2936	3210
39	153	5327.02	Middle	No	97.10	\$95,500	\$92,731	\$74,621	3541	23.38	828	1082	1264
39	153	5327.03	Upper	No	130.24	\$95,500	\$124,379	\$100,083	5599	17.15	960	2248	2492
39	153	5327.05	Upper	No	136.32	\$95,500	\$130,186	\$104,754	7119	14.51	1033	2488	2500
39	153	5327.06	Upper	No	120.96	\$95,500	\$115,517	\$92,955	3726	10.68	398	1615	1364
39	153	5327.08	Upper	No	130.17	\$95,500	\$124,312	\$100,026	5323	15.97	850	1791	1869
39	153	5329.01	Middle	No	118.75	\$95,500	\$113,406	\$91,250	1577	9.00	142	535	608
39	153	5329.02	Upper	No	128.53	\$95,500	\$122,746	\$98,771	10091	21.03	2122	2378	2868
39	153	5329.99	Middle	No	118.07	\$95,500	\$112,757	\$90,729	5962	11.30	674	1729	1938
39	153	5330.00	Middle	No	83.38	\$95,500	\$79,628	\$64,073	1614	7.99	129	735	837
39	153	5331.01	Upper	No	222.09	\$95,500	\$212,096	\$170,659	4873	11.18	545	1531	1572
39	153	5331.02	Upper	No	244.24	\$95,500	\$233,249	\$187,679	2394	7.89	189	735	816
39	153	5332.00	Upper	No	164.96	\$95,500	\$157,537	\$126,765	5847	13.44	786	1895	2023
39	153	5334.00	Middle	No	119.67	\$95,500	\$114,285	\$91,958	5973	30.09	1797	1953	2069
39	153	5335.01	Upper	No	183.57	\$95,500	\$175,309	\$141,063	9186	27.49	2525	2453	2641
39	153	5335.02	Upper	No	124.21	\$95,500	\$118,621	\$95,450	3972	11.66	463	1256	1375
39	153	5340.00	Upper	No	176.97	\$95,500	\$169,006	\$135,988	7304	13.02	951	2059	2276
39	153	5341.00	Upper	No	248.22	\$95,500	\$237,050	\$190,741	2699	13.93	376	836	860

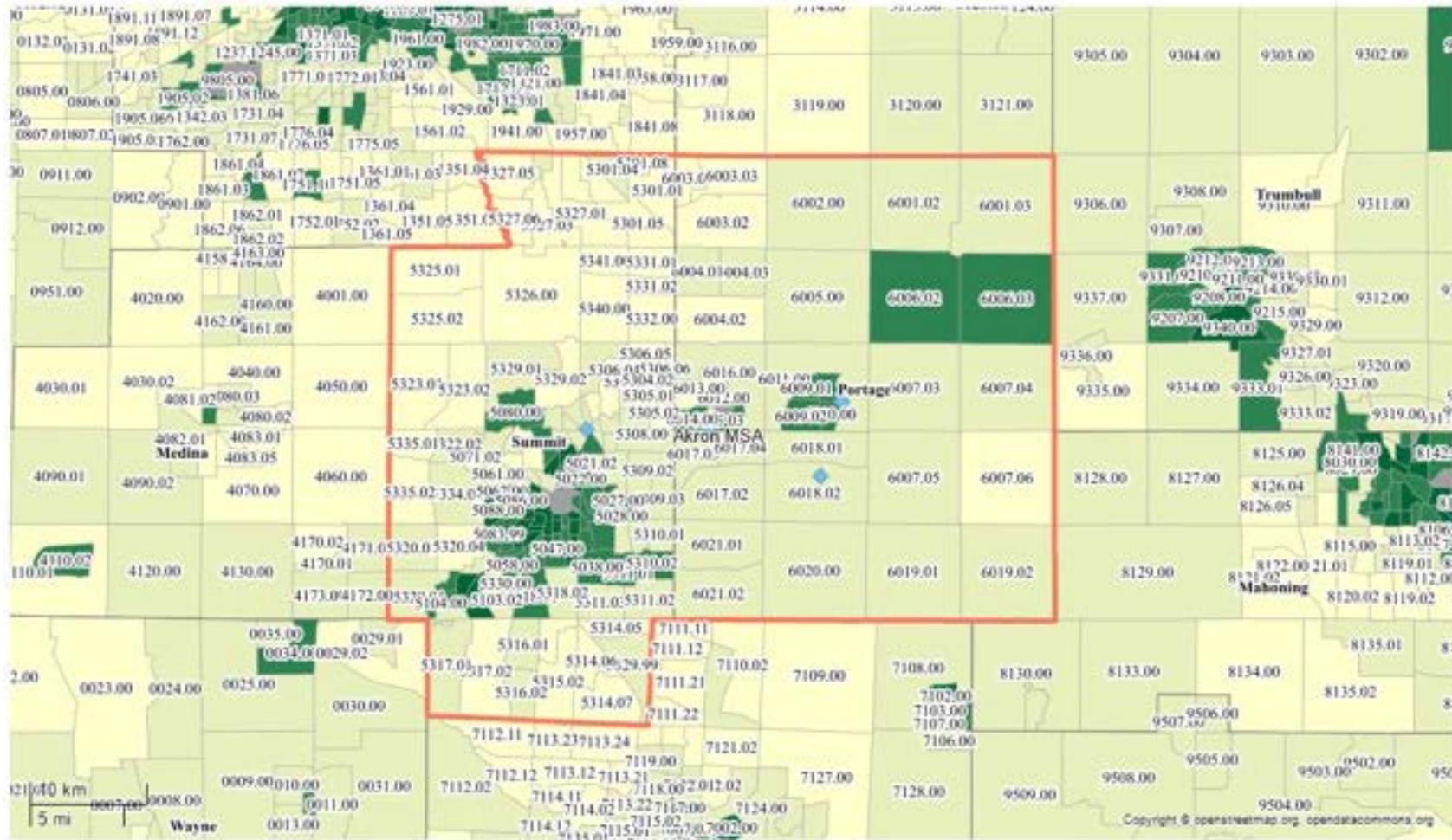
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- Map Legend**
- State
 - County
 - Census Tract
 - Zip Code
 - Analysis Area
 - Facilities
- Income Level**
- Low
 - Moderate
 - Middle
 - Upper
 - N/A

Applied Filters

- Purchased applications have been excluded.
- You are not included in the benchmark.
- -Minority Focus: % Minority



Map Legend

- State
- County
- Census Tract
- Zip Code
- Analysis Area

◆ Facilities

Income Level

- Low
- Moderate
- Middle
- Upper
- N/A

Applied Filters

- Purchased applications have been excluded.
- You are not included in the benchmark.
- -Minority Focus: % Minority

COMMUNITY REINVESTMENT ACT NOTICE

under the Federal Community Reinvestment Act (CRA), the Federal Reserve Board (Board) evaluates our record of helping to meet the credit needs of this community consistent with safe and sound operations. The Board also takes this record into account when deciding on certain applications submitted by us. Your involvement is encouraged.

You are entitled to certain information about our operations and our performance under the CRA. You may review today the public section of our most recent CRA evaluation, prepared by the Federal Reserve Bank of Cleveland, 1455 East Sixth Street, Cleveland, Ohio 44114, and a list of services provided at this branch. You may also have access to the following additional information, which we will make available to you at this branch within five calendar days after you make a request to us: (1) A map showing the assessment area containing this branch, which is the area in which the Board evaluates our CRA performance in this community; (2) information about our branches in this assessment area; (3) a list of services we provide at those locations; (4) data on our lending performance in this assessment area; and (5) copies of all written comments received by us that specifically relate to our CRA performance in this assessment area, and any responses we have made to those comments. If we are operating under an approved strategic plan, you may also have access to a copy of the plan.

At least 30 days before the beginning of each quarter, the Federal Reserve System publishes a list of the banks that are scheduled for CRA examination by the Reserve Bank in that quarter. This list is available from Officer in Charge of Supervision, Federal Reserve Bank of Cleveland, 1455 East Sixth Street, Cleveland, Ohio 44114.

You may send written comments about our performance in helping to meet community credit needs to:

ROBERT STANDARDI, COMPLIANCE OFFICER
PORTAGE COMMUNITY BANK
1311 EAST MAIN STREET
RAVENNA, OHIO 44266

and to Officer in Charge of Supervision, Federal Reserve Bank of Cleveland, 1455 East Sixth Street, Cleveland, Ohio 44114.

Your letter, together with any response by us, will be considered by the Federal Reserve System in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the Reserve Bank.

You may also request from the Reserve Bank an announcement of our applications covered by the CRA filed with the Reserve Bank.

We are an affiliate of Portage Bancshares, Inc., a bank holding company. You may request from Officer in Charge of Supervision, Federal Reserve Bank of Cleveland, 1455 East Sixth Street, Cleveland, Ohio 44114, an announcement of applications covered by the CRA filed by bank holding companies.

HOME MORTGAGE DISCLOSURE ACT NOTICE

The HMDA data about our residential mortgage lending are available online for review. The data show geographic distribution of loans and applications; ethnicity, race, sex, age, and income of applicants and borrowers; and information about loan approvals and denials. HMDA data for many other financial institutions are also available online. For more information, visit the Consumer Financial Protection Bureau's website

(www.consumerfinance.gov/hmda).

PUBLIC DISCLOSURE

December 2, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Portage Community Bank
RSSD #2668598

1311 East Main Street
Ravenna, OH 44266

Federal Reserve Bank of Cleveland

P.O. Box 6387
Cleveland, OH 44101-1387

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, nor should it 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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INSTITUTION'S COMMUNITY REINVESTMENT ACT (CRA) RATING

Portage Community Bank (Portage) is rated: Outstanding

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Outstanding

The major factors and criteria contributing to this rating include:

- The net loan-to-deposit (NLTD) ratio is reasonable given the institution's size, financial condition, and assessment area (AA) credit needs;
- A majority of loans and other lending-related activities are in the AA;
- The distribution of loans reflects a reasonable penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes; and,
- The geographic distribution of loans reflects reasonable dispersion throughout the AA.
- The bank's community development performance demonstrates excellent responsiveness to the community development needs of the AA, considering the bank's capacity and the need and availability of such opportunities in the bank's AA.

SCOPE OF EXAMINATION

The Federal Financial Institutions Examination Council's (FFIEC's) Interagency Examination Procedures for Intermediate Small Institutions was utilized to evaluate Portage's CRA Performance under Regulation BB. The evaluation considered CRA performance context, including Portage's asset size, financial condition, business strategy and market competition, as well as the demographics, economic characteristics, and credit needs of the AAs. The following data was reviewed:

- Portage's 24-quarter average NLTD ratio.
- Home Mortgage Disclosure Act (HMDA)-reportable (home purchase, refinance, home improvement, multi-family, and other purpose closed end) loans, small business loans, consumer (motor vehicle, other secured, and other unsecured) loans, and home equity lines of credit were analyzed from January 1, 2022, through December 31, 2023.
- Based on the total loan volume by number and dollar amount, HMDA-reportable lending received the most weight, followed by small business, home equity, and consumer lending, respectively.

- In accordance with CRA examination procedures, the HMDA universe was reviewed.¹ Conclusions were reached in the aggregate. The universe and not a sample of small business, home equity, and consumer loans was used in this evaluation. Conclusions were reached in the aggregate for consumer loans.
- Borrower distribution received more weight than geographic distribution based on the overall percentage of low- and moderate-income (LMI) families (38.4%) compared to LMI geographies (34.7%).
- Aggregated (peer) lending data, which is comprised of lending activity for all other lenders reporting home mortgage loans under HMDA in the respective AA, was used as a comparison in evaluating the bank's lending performance in 2022 and 2023.
- Lending performance in low-, moderate-, middle-, and upper-income census tracts and to low-, moderate-, middle-, and upper-income borrowers was considered for each product; however, comments for activity in middle- and upper-income tracts and to middle- and upper-income borrowers are only included when they impacted the outcome of the analyses.
- The evaluation period for community development activities was November 27, 2018, through December 2, 2024. Community development activities are comprised of community development loans, qualified investments, and services.

DESCRIPTION OF INSTITUTION

Portage is a community bank headquartered in Ravenna, Ohio. The bank's characteristics include:

- Portage is a wholly owned subsidiary of Portage Bancshares, Inc. in Ravenna, Ohio.
- Portage has total assets of \$500.6 million and total deposits of \$434.8 million as December 31, 2023. Portage has seen a 51.8% increase in total assets and a 58.8% increase in total deposits since the previous evaluation.²
- Since the previous evaluation, Portage opened two branches. On January 13, 2020, Portage opened a branch in Cuyahoga Falls (Summit County); on April 19, 2021, Portage opened a branch in Rootstown (Portage County).
- Portage maintains its main office with a full-service Automated Teller Machine (ATM) and three branches with full-service ATMs. In Portage County, the bank maintains its main office in Ravenna and a branch in Kent in moderate-income tracts and a branch in Rootstown in a middle-income tract. In Summit County, the bank has a branch in

¹HMDA data was reviewed since the bank's previous evaluation; however, only data for 2022 and 2023 is presented in this evaluation.

²Financial As of Date: June 30, 2018

Cuyahoga Falls in a middle-income tract. All four offices offer drive-thru services, extended hours of service, and weekend hours.

- Portage has not closed any branches since the previous evaluation.
- Portage is a full-service retail bank that offers traditional products, including consumer and business checking and savings accounts, home equity loans, motor vehicle loans, credit cards, and commercial and agriculture loans. Portage’s website, portagecommunity.bank, and online and mobile banking supplements its branch and ATM networks. Customers can confirm balances, what transactions have posted, pay bills, transfer funds between accounts, and make deposits.
- Portage has seen an upward trend in the use of its digital and mobile banking platforms. From 2019 through 2024 Portage has experienced a 13.3% increase in the number of online consumer banking clients, an 82.8% increase in the number of online business banking clients, and a 151.6% increase in the number of mobile banking users.

As shown in the table below, the loan portfolio composition as of December 31, 2023. Portage’s primary business focus is residential real estate.

COMPOSITION OF LOAN PORTFOLIO		
Loan Type	12/31/2023	
	\$ (000s)	Percent
Construction and Development	6,524	1.8%
Secured by One- to Four- Family Dwellings	192,609	53.8%
Other Real Estate: Farmland	2,739	0.8%
Multifamily	2,968	0.8%
Nonfarm nonresidential	112,183	31.3%
Commercial and Industrial	36,525	10.2%
Loans to Individuals	4,358	1.2%
Agricultural Loans	0	0.0%
Total	\$357,906	100.00%

*This table does not include the entire loan portfolio. Specifically, it excludes loans to depository institutions, bankers acceptances, lease financing receivables, obligations of state and political subdivisions, and other loans that do not meet any other category. Contra assets are also not included

Portage’s investment portfolio as of December 31, 2023, was \$108.7 million, which represented 21.7% of total assets. U.S. Treasury and agency securities accounted for 68.7% of total investments, while municipal securities, other securities, and interest-bearing bank balances accounted for 25.0%, 4.6%, and 1.6% of the remaining total investments, respectively.

There are no known legal, financial, or other factors impeding Portage’s ability to help meet the credit needs of its communities.

Portage was rated Satisfactory under the CRA at its previous evaluation conducted November 26, 2018. The lending and community development tests were each rated Satisfactory.

DESCRIPTION OF ASSESSMENT AREA

Portage is an intrastate bank in northeast Ohio with one delineated AA in the Akron, OH (Akron) MSA. Portage’s delineated AA consists of the entire MSA, which is comprised of Summit and Portage counties. The bank’s AA has not changed since the previous evaluation.

- The Census Bureau released new size and population data from the 2020 Census on August 12, 2021, as a result of these changes, the AA was comprised of the following tracts:

Income Tract Designations	
Assessment Area: Akron, OH MSA #10420	
Income Tract Level	2022-2023
Low	22
Moderate	39
Middle	66
Upper	45
Unknown	4
Total	176

- The MSA gained six income tracts since the previous evaluation. Specifically, the MSA lost eight low- and two middle-income tracts and gained five moderate-, seven upper-, and four unknown-income tracts.
- As of June 30, 2023, the Federal Deposit Insurance Corporation’s (FDIC) Deposit Market Share report, ranks Portage 10th among 25 institutions operating in the MSA with 2.4% of the deposit market share, compared to the three largest market holders, The Huntington National Bank; JP Morgan Chase Bank, National Association; and PNC Bank, National Association, which hold a 27.9%, 16.0%, and 13.7% of the market, respectively.
- The 2023 HMDA Peer Market data indicates that Portage ranked 20th out of 394 HMDA reporters in Akron MSA and originated 183 loans. By comparison, first ranked The

Huntington National Bank, second ranked Cross Country Mortgage, LLC, and third ranked Third Federal Savings and Loan, originated 1,992, 995, and 791 loans, respectively.

- The 2022 HMDA Peer Market data indicates that Portage ranked 21st out of 425 HMDA reporters in Akron MSA and originated 262 loans. By comparison, first ranked The Huntington National Bank, second ranked Third Federal Savings and Loan, and third ranked Cross Country Mortgage, LLC, originated 2,366, 1,197, and 1,170 loans, respectively.
- Between 2022 and 2023, the total number of HMDA reporters in the MSA declined by 7.3% and originated mortgage loans declined by 20.7% among these same HMDA reporters. Specifically, Portage's originated mortgage loans declined by 30.2%.

Community Contact

A community contact interview was conducted as part of this evaluation to provide supplemental information regarding the area's credit needs and context to demographic and economic conditions of the local community. The contact was from a community foundation that distributes grants to a wide variety of causes that help meet community needs. The contact stated that food insecurity is a significant issue in Greater Akron impacting a substantial portion of the population. Numerous factors contribute to food insecurity, including poverty, unemployment, and underemployment. Job opportunities are often limited, and many workers struggle with low wages and unstable employment. The contact stated that rising rents and food prices are forcing many low-income residents to choose between paying rent and covering other essential needs like food and healthcare. The growing gap between rent costs and area wages is a leading cause of increased housing instability and potential homelessness. The contact emphasized the need for increased rental assistance and eviction prevention services, which even in small amounts helps reduce homelessness, food insecurity, and chronic health issues. The contact believes there are opportunities for local financial institutions to help the ALICE (Asset Limited, Income Constrained, Employed) population have increased access to financial education and small, affordable, short-term loans to help pay for unexpected expenses either directly or partnering with local agencies embedded in the community. Lastly, the contact stated there are always opportunities for local financial institutions to help small businesses access the credit they need and increase awareness of the small business lending environment, especially for women-owned and minority-owned small businesses.

Population Characteristics

Population Change			
Assessment Area: Akron, OH MSA			
Area	2020 Population	2023 Population	Percent Change
Portage County	161,791	162,665	0.5%
Summit County	540,428	535,733	-0.9%
Akron, OH MSA	702,219	698,398	-0.5%
Ohio	11,799,448	11,785,935	-0.1%
<i>Source: 2020-2023 U.S. Census Bureau 2020 U.S. Census Bureau Decennial Census</i>			

- From 2020 through 2023 the MSA experienced a 0.5% loss in population, compared to Portage County which experienced a 0.5% gain in population. Ohio experienced a slight loss in population at 0.1% during this period.
- 79.5% of the AA population was 18 years of age or older, the legal age to enter into a contract.
- 17.6% of the population in the AA was 65 or older, compared to 16.9% in Ohio.
- MSA population is aging and decreasing resulting in a shrinking working population or lack of labor supply and increasing demand for leisure and healthcare services.
- 27.9% of the AA’s population reside in the AA’s LMI tracts.
- According to Census data, Akron (Summit County) is the most populous city in MSA and the fifth largest in Ohio.³ In 2023 Akron had a population of 188,701, and its population decreased by 0.9% since 2020. By comparison, the largest city in Portage County is Kent with a population of 27,601 in 2023, and its population decreased by 2.1% since 2020.⁴

³ [Ohio Demographics – Ohio Cities by Population](#)

⁴ [U.S. Census Bureau QuickFacts](#)

Income Characteristics

**Borrower Income Levels
Akron, OH MSA**

FFIEC Estimated Median Family	% Change	Low	Moderate	Middle	Upper
		0 - 49.99%	50% - 79.99%	80% - 119.99%	120% - & above
2022	\$82,000	0 - \$40,999	\$41,000 - \$65,599	\$65,600 - \$98,399	\$98,400 - & above
2023	\$95,500 16.5%	0 - \$47,749	\$47,750 - \$76,399	\$76,400 - \$114,599	\$114,600 - & above

- The 2023 median family income (MFI) in the Akron MSA was \$95,500, it increased by 16.5% since 2022.
- MFI in the Akron MSA in 2020 was \$76,842, which represents a 24.3% increase from 2020 to 2023.
- In 2020 Ohio’s MFI was \$74,391, which was nearly 3.3% less than MFI in the Akron MSA. Ohio minimum wage⁵ in 2023 was \$10.10 per hour or \$21,008 annually. The Federal minimum wage is \$7.25⁶ per hour and has not increased since 2009.

Poverty Rates			
Assessment Area: Akron, OH MSA			
Area	2020	2021	2022
Portage County	9.9%	12.4%	12.4%
Summit County	12.1%	12.5%	12.6%
Ohio	12.6%	13.3%	13.4%
United States	11.9%	12.8%	12.6%
<i>Source: Federal Reserve Economic Data FRED St. Louis Fed</i>			

- Poverty rates in Portage County were lower than Ohio and national rates in 2020, 2021 and 2022, while poverty rates in Summit County were lower than poverty rates in Ohio but varied with national rates during the same period.
- Of the 177,102 families in the AA, 38.4% are designated as LMI and 8.6% of families are living below the poverty level, compared to 9.6% of families living below the poverty level in Ohio.

⁵ [Ohio Minimum Wage](#)

⁶ [Federal Minimum Wage](#)

- Supplemental Nutrition Assistance Program (SNAP)⁷ helps LMI individuals and families, the elderly, and the working poor purchase food and reduce food insecurity and may free up resources for other necessities, such as clothing, housing, and medical expenses.

SNAP Assistance	
Assessment Area: Akron, OH MSA	
Area	2021
Portage County	9.0%
Summit County	14.7%
Ohio	12.7%
<i>Source: Federal Reserve Economic Data FRED St. Louis Fed</i>	

- While Summit and Portage counties had similar poverty rates in 2021, Summit County had the highest percentage of population receiving SNAP benefits by far.

Housing Characteristics

Housing Cost Change						
Assessment Area: Akron, OH MSA						
Area	Median Housing Value			Median Gross Rent		
	2020	2022	Percent Change	2020	2022	Percent Change
Portage County	\$160,300	\$197,100	23.0%	\$870	\$990	13.8%
Summit County	\$151,300	\$182,500	20.6%	\$854	\$956	11.9%
Ohio	\$151,400	\$183,300	21.1%	\$825	\$945	14.5%
<i>Source: 2018-2022 U.S. Census Bureau: American Community Survey 2016-2020 U.S. Census Bureau: American Community Survey</i>						

- Median housing values from 2020 to 2022 in Portage County increased at a greater pace than housing values in Ohio and Summit County.
- While the percentage of rent increases in Portage and Summit counties was less than rent increases in Ohio, the rise in median gross rents indicates the need for more affordable housing in the MSA. According to 2020 Census data, 44.3% of all renters have rental costs that are 30.0% or greater of their income.
- According to HUD's 2023 Fair Market Rent (FMR) data,⁸ the average rent for a two-

⁷ [FRED – SNAP Benefits Recipients](#)

⁸ [HUD's Fair Market Rent \(FMR\) – FY2023](#)

bedroom unit in Akron MSA is \$1,027, up from \$890 in 2022.

- With Ohio’s minimum wage at \$10.10, renters across Ohio can only afford \$525 in monthly rent. The typical minimum wage worker cannot afford rent for a FMR two-bedroom apartment or would have to work 102 hours to afford a modest two-bedroom apartment in this AA.
- According to the National Low Income Housing Coalition,⁹ full-time workers must earn at least \$19.09 an hour (\$39,702 annual salary) in Ohio to afford a two-bedroom rental apartment, which is almost double the minimum wage in the state. Rents continue to increase nationwide; currently the national average rent is \$1,486 a month, which requires workers to earn a minimum wage of \$28.58 (\$59,446 annual salary).¹⁰
- There are 315,600 housing units in the AA, of which 61.8% are owner-occupied, 30.0% are rentals, and 8.3% are vacant. Housing units in the AA primarily consist of single-family (75.3%) and multi-family (22.5%) dwellings.
- The median age of housing stock in the AA is 59 years old, and 25.0% of housing units were built prior to 1950. The age of the housing stock across the AA demonstrates a potential need for home improvement lending and refinance or home improvement loans to remove lead-based paint that was commonly used in houses and apartments built before 1978.¹¹

Housing Cost Burden						
Assessment Area: Akron, OH MSA						
Area	Cost Burden - Owners			Cost Burden - Renters		
	Low Income	Moderate Income	All Owners	Low Income	Moderate Income	All Renters
Portage County	61.6%	31.5%	16.4%	81.6%	36.7%	47.7%
Summit County	62.5%	29.3%	16.8%	73.1%	33.1%	40.9%
Akron, OH MSA	62.3%	29.8%	16.7%	74.9%	33.7%	42.2%
Ohio	59.3%	26.1%	16.4%	71.1%	24.7%	38.9%

Cost Burden is housing cost that equals 30 percent or more of household income
Source: U.S. Department of Housing and Urban Development (HUD), 2016-2020 Comprehensive Housing Affordability Strategy

- 62.3% of low-income homeowners and 74.9% of low-income renters in the MSA are cost burdened, compared to 29.8% of moderate-income homeowners and 33.7% of moderate-income renters in the MSA.

⁹ [National Low Income Housing Coalition-Ohio](#)

¹⁰ [National Low Income Housing Coalition](#)

¹¹ [Ohio Department of Health/Know Our Programs/Childhood Lead Poisoning](#)

- Across the MSA, 16.7% of all homeowners compared to 42.2% of all renters are cost burdened.
- This data shows that cost burden disproportionately affects renter-occupied households, particularly low-income renters as well as low-income homeowners.
- Cost-burdened renters may have a difficult time saving enough money to make a sufficient down payment to purchase a home or otherwise afford increasing rents.

Unemployment Rates					
Assessment Area: Akron, OH MSA					
Area	2019	2020	2021	2022	2023
Portage County	4.3%	7.3%	4.8%	3.8%	3.5%
Summit County	4.3%	8.3%	5.5%	4.1%	3.7%
Akron, OH MSA	4.3%	8.1%	5.3%	4.0%	3.6%
Ohio	4.2%	8.2%	5.1%	4.0%	3.5%

Source: Bureau of Labor Statistics(BLS), Local Area Unemployment Statistics

- In 2020 unemployment rates in the MSA and Ohio increased substantially in response to the COVID-19 pandemic and economic downturn. Post-COVID, unemployment rates in the MSA and Ohio decreased and reached historic lows in 2023.
- According to Ohio Office of Research:¹²
 - Portage County
 - Land use is primarily rural with less than 20.0% available for urban (i.e., residential, commercial, industrial, or recreational) development.
 - The leading industries are trade, transportation, and utilities; manufacturing; government; leisure and hospitality; and education and health care services.
 - The average private sector weekly wage at \$987 indicates employed persons can afford the median rent of \$990.
 - Major employers include but are not limited to Kent State University, McMaster-Carr Supply Company, Northeast Ohio Medical University, Parker-Hannifin, Portage County government, Ravenna City Schools, and UH Portage Medical Center.
 - Summit County
 - Land use is primarily urban with nearly 58.0% available for urban (i.e., residential, commercial, industrial, or recreational) development.

¹² Ohio County Trends: [County Trends | Development](#)

- The leading industries are trade, transportation, and utilities; education and health care services; professional and business services; leisure and hospitality; and government.
 - The average private sector weekly wage at \$1,126 indicates employed persons can afford the median rent of \$956.
 - Major employers include but are not limited to Akron Children’s Hospital, Akron City Schools, Bridgestone Americas, Goodyear Tire & Rubber Company, Signet Jewelers, Summa Health System, and University of Akron.
- Based on 2020 Census data and BroadbandOhio,¹³ while approximately 88.4% of households in Portage County and 90.4% in Summit County have a broadband internet subscription, at least 26.0% of the populated area and 11.0% of households in Portage County and at least 11.0% of the populated area and 5.0% of households in Summit County do not have access to the minimum bandwidth needed for basic internet activity. Nationally, those with access to a broadband-enabled computer are employed at a higher rate in urban and rural counties.

¹³ [BroadbandOhio – Availability Gaps](#)

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Portage’s overall CRA performance is rated Outstanding. Details are provided below, including facts, data, and analyses used to form conclusions regarding the lending and community development test performance ratings.

LENDING TEST

Portage’s performance relative to the lending test is rated Satisfactory based on Portage’s loan-to-deposit ratio, AA concentration, and borrower and geographic distribution.

Net Loan-to-Deposit Ratio (NLTD)

A financial institution’s NLTD ratio is evaluated to determine the reasonableness of lending considering performance context, such as Portage’s capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AA since the previous evaluation in comparison to similarly situated Federal Deposit Insurance Corporation (FDIC)-insured institutions (custom peer group). To assess the bank’s performance, we analyzed the NLTD ratio of comparable institutions. The custom peer group was selected based on asset size, market share, and the area where they are located.

Comparative Loan-to-Deposit (LTD) Ratio		
Institution	Total Assets as of 6/30/2024 \$(000)	NLTD Ratio (%)
		24 – Quarter Average*
Portage Community Bank	\$510,058	77.0
Similarly Situated Institutions	\$(000)	Custom Peer Ratio
Apple Creek Banking Company	\$254,805	84.4
Hometown Bank	\$254,435	92.8
Middlefield Banking Company	\$1,824,245	93.1
Quarterly LTD Ratio Average Since the Previous Evaluation		90.1
* September 30, 2018 - June 30, 2024		

During this period, Portage’s NLTD ratio averaged 77.0%, compared to peer ratio at 90.1%. In discussions with bank management, they indicated there was an influx of deposits due to government stimulus payments during the economic downturn. More recently overall deposit and loan growth has slowed in this high-interest rate environment but is returning to more

normal levels. Given these factors, Portage’s NLTD ratio is considered reasonable given the bank’s size, financial condition, and AA credit needs.

Assessment Area Concentration

During the evaluation period, Portage’s lending was analyzed to determine the volume of lending inside and outside Portage’s AA. A majority of loans and other lending-related activities are in the AA.

Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Loan Data	121	87.7	\$3,285	86.8	17	12.3	\$499	13.2
Total Consumer related	121	87.7	\$3,285	86.8	17	12.3	\$499	13.2
Home Improvement	4	80	\$215	51.8	1	20	\$200	48.2
Home Purchase - Conventional	306	72.9	\$61,869	72.3	114	27.1	\$23,654	27.7
Home Purchase - FHA	49	64.5	\$7,959	65.3	27	35.5	\$4,231	34.7
Home Purchase - VA	4	57.1	\$916	58.1	3	42.9	\$660	41.9
Multi-Family Housing	8	47.1	\$5,723	48	9	52.9	\$6,211	52
Other Purpose Closed-End	22	84.6	\$2,266	75.2	4	15.4	\$748	24.8
Refinancing	74	84.1	\$13,228	77.7	14	15.9	\$3,793	22.3
Total HMDA related	467	73.1	\$92,176	70	172	26.9	\$39,497	30
Home Equity	298	85.4	\$31,635	81.1	51	14.6	\$7,355	18.9
Total Non-HMDA	298	85.4	\$31,635	81.1	51	14.6	\$7,355	18.9
Small Business	220	82.1	\$43,718	81.7	48	17.9	\$9,784	18.3
Total Small Bus. related	220	82.1	\$43,718	81.7	48	17.9	\$9,784	18.3
TOTAL LOANS	1,106	79.3	\$170,814	74.9	288	20.7	\$57,135	25.1

Of the bank’s total lending from January 1, 2022, to December 31, 2023, 79.3% by volume and 74.9% by dollar amount were made inside the AA.

Lending to Borrowers of Different Income Levels and to Businesses of Different Sizes

The borrower distribution to borrowers of different income levels and businesses of different sizes is reasonable. The borrower distribution of consumer lending is excellent and reasonable to HMDA and small business lending and home equity lines of credit.

HMDA Lending

HMDA loans are comprised of home purchase, refinance, other purpose closed-end, multi-family, and home improvement loans, respectively. See Appendix C for explicit HMDA lending data.

Portage's performance was compared to the percentage of families by family income (proxy) and aggregate lending performance. During the evaluation period, Portage originated 467 HMDA loans totaling \$92.2 million, of which 38 (8.1%) HMDA loans were made to borrowers with unknown-income designations. The bank made 9.4% of loans to borrowers with unknown incomes, compared to the aggregate of all lenders at 13.5% in 2022. The bank made 6.3% of loans to borrowers with unknown-incomes, compared to the aggregate of all lenders at 14.2% in 2023.

Portage originated 53 (11.3%) HMDA loans to low-income borrowers, which was below proxy at 20.7%. The bank's performance at 10.5% exceeded aggregate lending performance at 9.6% in 2022 and at 12.6% fell slightly below aggregate lending performance at 13.1% in 2023. Portage originated 104 (22.3%) HMDA loans to moderate-income borrowers, which exceeded proxy at 17.7%. The bank's performance at 25.3% exceeded aggregate lending performance at 21.3% in 2022 and at 17.9% fell below aggregate lending performance at 23.4% in 2023. Considering these factors along with the high percentage of LMI cost-burdened renters, Portage's borrower distribution of HMDA lending to LMI borrowers is reasonable.

Small Business Lending

Portage's performance was compared to the percentage of small businesses (proxy). During the evaluation period, Portage originated 220 loans to businesses of different sizes totaling \$43.7 million.

Small Business Loans by Business Revenue & Loan Size

Assessment Area: Akron, OH MSA

		Bank Lending & Demographic Data				
		2022, 2023				
		Count		Dollar		Total Businesses
		#	%	\$ (000s)	\$ %	%
Revenue	\$1 Million or Less	136	61.8%	24,545	56.1%	90.4%
	Over \$1 Million	84	38.2%	19,173	43.9%	8.6%
	<i>Total Rev. available</i>	220	100.0%	43,718	100.0%	99.1%
	Rev. Not Known	0	0.0%	0	0.0%	0.9%
	<i>Total</i>	<i>220</i>	<i>100%</i>	<i>43,718</i>	<i>100%</i>	<i>100%</i>
Loan Size	\$100,000 or Less	86	39.1%	5,221	11.9%	
	\$100,001 - \$250,000	77	35.0%	12,353	28.3%	
	\$250,001 - \$1 Million	57	25.9%	26,144	59.8%	
	<i>Total</i>	<i>220</i>	<i>100%</i>	<i>43,718</i>	<i>100%</i>	
Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	60	44.1%	3,593	14.6%	
	\$100,001 - \$250,000	44	32.4%	6,579	26.8%	
	\$250,001 - \$1 Million	32	23.5%	14,373	58.6%	
	<i>Total</i>	<i>136</i>	<i>100%</i>	<i>24,545</i>	<i>100%</i>	

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data; 2023 D&B information

Percentages may not total 100 percent due to rounding

Portage originated 136 (61.8%) loans totaling \$24.6 million to businesses with revenues of \$1.0 million or less, which was below the percentage of small businesses at 90.4%. However, Portage originated 163 (74.1%) small dollar loans in amounts of \$250,000 or less. Portage’s willingness to lend in smaller amounts exhibits an adequate responsiveness to credit needs of small businesses in the AA. The community contact indicated a need for small businesses to have access to affordable credit. Considering these factors, the distribution among businesses of different sizes is reasonable.

Home Equity Lending

Portage’s performance was compared to the percentage of families (proxy) by family income. During the evaluation period, Portage originated 298 home equity lines of credit totaling \$31.6 million.

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: Akron, OH MSA

Household Income Levels	Bank Lending & Demographic Data				
	2022, 2023				
	Count		Dollar		Families by Family Income
	#	%	\$ (000s)	\$ %	%
Low	33	11.1%	2,093	6.6%	20.7%
Moderate	66	22.1%	5,896	18.6%	17.7%
Middle	76	25.5%	7,108	22.5%	21.3%
Upper	123	41.3%	16,539	52.3%	40.3%
Unknown	0	0.0%	0	0.0%	0.0%
Total	298	100.0%	31,635	100.0%	100.0%

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Percentages may not total 100 percent due to rounding

Portage originated 33 (11.1%) home equity lines of credit to low-income borrowers, which was below proxy at 20.7%. Portage originated 66 (22.1%) home equity lines of credit to moderate-income borrowers, which exceeded proxy at 17.1%. Portage’s borrower distribution of home equity lines of credit to low-income borrowers is reasonable and excellent to moderate-income borrowers.

Consumer Lending

Consumer loans are comprised of motor vehicle, other secured, and other unsecured loans. Portage’s performance was compared to the percentage of households by household income (proxy). During the evaluation period Portage originated 121 consumer loans totaling \$3.3 million, of which one (0.8%) consumer loan was made to borrowers with unknown-income designations.

Borrower Distribution of Consumer Loans

Assessment Area: Akron, OH MSA

Household Income Levels	Bank Lending & Demographic Data				
	2022, 2023				Households by Household Income %
	Count		Dollar		
#	%	\$ (000s)	\$ %		
Low	30	24.8%	557	17.0%	24.5%
Moderate	35	28.9%	579	17.6%	16.1%
Middle	34	28.1%	883	26.9%	17.6%
Upper	21	17.4%	1,239	37.7%	41.8%
Unknown	1	0.8%	26	0.8%	0.0%
<i>Total</i>	<i>121</i>	<i>100.0%</i>	<i>3,285</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Percentages may not total 100 percent due to rounding

Portage originated 30 (24.8%) consumer loans to low-income borrowers, which was comparable to proxy at 24.5%. Portage originated 35 (28.9%) consumer loans to moderate-income borrowers, which significantly exceeded proxy at 16.1%. The community contact indicated a need for small dollar loans to pay for unexpected expenses, particularly for LMI individuals. Portage’s borrower distribution of consumer lending to LMI borrowers is excellent.

Geographic Distribution of Loans

Portage’s geographic distribution of loans reflects a reasonable dispersion throughout the AA with a significant level of lending gaps. The geographic distribution of HMDA, small business, and consumer lending, and home equity lines of credit is reasonable.

Lending Penetration

	Akron, OH MSA - 2022				Akron, OH MSA - 2023			
	# Tracts	Tracts w/ no loans	Tracts w/ Loans	Penetration	# Tracts	Tracts w/ no loans	Tracts w/ Loans	Penetration
Low	22	15	7	31.8%	22	18	4	18.2%
Moderate	39	14	25	64.1%	39	20	19	48.7%
Middle	66	13	53	80.3%	66	17	49	74.2%
Upper	45	13	32	71.1%	45	17	28	62.2%
Unknown	4	4	0	0.0%	4	4	0	0.0%
Total	176	59	117	66.5%	176	76	100	56.8%

Portage penetrated 61.6% of the AA’s total tracts during the evaluation period, which is a significant level of lending gaps. Portage penetrated 25.0% of the low-income tracts, which is a substantial level of lending gaps and 56.4% of the moderate-income tracts, which is a significant level of lending gaps. However, the Akron market is competitive, and Portage only has a 2.4% deposit market share and four branches. It would be difficult to expect them to serve the entire MSA. Other factors impacting Portage’s ability to originate loans, especially in LMI tracts, includes the high-interest rate environment, rising home prices, the high number of rental/vacant housing units, and high poverty rates in LMI areas.

HMDA Lending

Portage’s performance was compared to the percentage of owner-occupied units (proxy) and aggregate lending performance. During the evaluation period, Portage originated 467 HMDA loans totaling \$92.2 million. See Appendix C for explicit HMDA lending data.

Portage originated 11 (2.4%) HMDA loans in low-income tracts, which fell significantly below proxy at 5.1%. The bank’s performance at 2.2% fell significantly below aggregate lending performance at 4.7% in 2022, and at 2.6% fell significantly below aggregate lending performance at 5.7% in 2023. Portage originated 103 (22.1%) HMDA loans in moderate-income tracts, which exceeded proxy at 17.4%. The bank’s performance at 21.3% exceeded aggregate lending performance at 16.7% in 2022, and at 23.2% exceeded aggregate lending performance at 19.7% in 2023.

Considering the limited opportunities to originate mortgage loans in LMI tracts, particularly in low-income tracts that have a limited supply of housing units and high number of rental and vacant units, and high poverty rates; geographic distribution of HMDA lending in low-income tracts is reasonable and excellent in moderate-income tracts.

Small Business Lending

Portage’s performance was compared to the percentage of businesses by tract income (proxy). During the evaluation period, Portage originated 220 small business loans totaling \$43.7 million.

Geographic Distribution of Small Business Loans

Assessment Area: Akron, OH MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data				
		2022, 2023				
		Count		Dollar		Total Businesses
		#	%	\$ (000s)	\$ %	%
SMALL BUSINESSES	Low	4	1.8%	1,305	3.0%	7.4%
	Moderate	41	18.6%	8,410	19.2%	15.0%
	Middle	129	58.6%	25,540	58.4%	37.6%
	Upper	46	20.9%	8,462	19.4%	37.3%
	Unknown	0	0.0%	0	0.0%	2.7%
	<i>Total</i>	<i>220</i>	<i>100%</i>	<i>43,718</i>	<i>100%</i>	<i>100.0%</i>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data; 2023 D&B information

Percentages may not total 100 percent due to rounding

Portage originated four (1.8%) small business loans in low-incomes tracts, which fell significantly below proxy at 7.4%. Portage originated 41 (18.6%) small business loans in moderate-income tracts, which exceeded proxy at 15.0%. The geographic distribution of small business lending is poor in low-income tracts and excellent in moderate-income tracts.

Home Equity Lending

Portage’s performance was compared to the percentage of owner-occupied units (proxy). During the evaluation period Portage originated 298 home equity lines of credit totaling \$31.6 million.

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: Akron, OH MSA

Tract Income Levels	Bank Lending & Demographic Data				
	2022, 2023				
	Count		Dollar		Families
	#	%	\$ (000s)	\$ %	%
Low	2	0.7%	68	0.2%	7.9%
Moderate	54	18.1%	4,611	14.6%	19.3%
Middle	183	61.4%	19,312	61.0%	40.1%
Upper	59	19.8%	7,644	24.2%	32.3%
Unknown	0	0.0%	0	0.0%	0.4%
<i>Total</i>	<i>298</i>	<i>100%</i>	<i>31,635</i>	<i>100%</i>	<i>100.0%</i>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Percentages may not total 100 percent due to rounding

Portage originated two (0.7%) home equity lines of credit in low-income tracts, which was significantly below proxy at 5.1%. Portage originated 54 (18.1%) home equity lines of credit in moderate-income tracts, which exceeded proxy at 17.4%. The geographic distribution of home equity lines of credit in low-income tracts is poor and excellent in moderate-income tracts.

Consumer Lending

Portage’s performance was compared to the percentage of households (proxy). During the evaluation period, Portage originated 121 consumer loans totaling \$3.3 million.

Geographic Distribution of Consumer Loans
Assessment Area: Akron, OH MSA

Tract Income Levels	Bank Lending & Demographic Data				
	2022, 2023				
	Count		Dollar		Households
	#	%	\$ (000s)	\$ %	%
Low	2	1.7%	55	1.7%	8.7%
Moderate	27	22.3%	680	20.7%	21.4%
Middle	76	62.8%	1,949	59.3%	40.1%
Upper	16	13.2%	600	18.3%	28.6%
Unknown	0	0.0%	0	0.0%	1.2%
<i>Total</i>	<i>121</i>	<i>100%</i>	<i>3,285</i>	<i>100%</i>	<i>100.0%</i>

Originations & Purchases
Based on 2023 FFIEC Census Data; 2016-2020 ACS data
Percentages may not total 100 percent due to rounding

Portage originated two (1.7%) consumer loans in low-income tracts, which was significantly below proxy at 8.7%. Portage originated 27 (22.3%) consumer loans in moderate-income tracts, which exceeded proxy at 21.4%. The geographic distribution of consumer lending in low-income tracts is poor and excellent in moderate-income tracts.

Response to Complaints

Neither Portage nor this Reserve Bank has received any CRA-related complaints since the previous examination.

Community Development Test

Portage’s performance under the community development test is considered Outstanding.

Portage facilitated 525 PPP loans totaling \$41.0 million through the U.S. government’s Paycheck Protection Program (PPP) between April 3, 2020, through May 4, 2021, to help small businesses impacted by the COVID-19 emergency. Of these loans, 470 (89.5%) loans totaling \$37.3 million were originated within the bank’s AA, and 145 (30.9%) totaling \$11.4 million were made in LMI tracts. Consistent with information provided in the May 27, 2020, joint statement on CRA

Consideration for Activities in Response to Coronavirus FAQs.¹⁴ Portage originated 145 PPP loans (30.9%) totaling \$11.4 million in LMI tracts; these loans are being considered in the community development test. PPP loans were originated outside of the evaluation period for the retail lending test.

Portage’s community development performance demonstrates an excellent responsiveness to the credit and community development needs of its AA through community development loans, qualified investments and donations, and community development services, considering Portage’s capacity and the need and availability of such opportunities in the AA. Community development activities also represent a significant increase by dollar amount since the previous evaluation. Community development loans supported businesses during the height of the COVID-19 emergency, as well as economic development, services to LMI individuals and families, and to a lesser extent affordable housing. Portage was able to obtain a new qualified investment that supported renovations to a university serving a moderate-income community and increase its levels of small dollar donations and community development services since the previous evaluation. The community contact stressed the need to reduce food insecurity, chronic health issues, and homelessness and increase access to financial literacy education and help LMI individuals and small businesses have easier access to the credit they need. Portage’s community development activities supported these expressed needs.

Community Development Loans

Portage originated 180 community development loans totaling approximately \$48.0 million during the evaluation period. The following table reflects the total number of community development loans by purpose, number, and dollar amount.

Purpose of CD Loan	#	\$
Revitalization / Stabilization	150	\$14,205,978
Economic Development	19	\$28,110,000
Services to LMI	10	\$5,258,132
Affordable Housing	1	\$375,000
Total	180	\$47,949,110
<i>Totals include loans that benefit broader regional area</i>		

¹⁴ [May 27 2020 - Frequently Asked Questions \(FAQs\) for Consideration for Activities in Response to the Coronavirus](#)

Revitalization / Stabilization

- 145 PPP loans totaling \$11.3 million were originated in LMI geographies in the AA. These loans are considered responsive to credit needs of small businesses and helped to stabilize these communities during the height of the COVID-19 emergency.
- Five loans totaling \$2.8 million provided financing to five small businesses in moderate-income geographies. These loans helped to create and retain job opportunities for residents in the construction, fast food, and service sectors. For instance, one loan provided funding to a Community Development Corporation (CDC) to renovate a community test kitchen and retain two staff to help residents learn to cook healthy meals on a budget.

Economic Development

- 11 SBA 504 loans totaling \$24.4 million were originated to two businesses. SBA 504 loans support small business growth and job creation and automatically qualify for CRA credit.
- Four loans totaling \$1.9 million provided working capital to a small business to expand its operations. These loans helped create and/or retain 17 full-time jobs and one part-time job.
- Two loans totaling \$995,000 to a small business to construct a building and renovate an existing building to provide space to expand operations. These loans helped create five permanent jobs and retain 10 permanent jobs.
- Two loans totaling \$900,000 to a small business to renovate a historic church building into a brewery. This loan helped create at least 10 permanent jobs.

Services to LMI

- Three loans totaling \$2.0 million provided working capital to a county agency to continue providing behavioral health services, including substance abuse prevention and treatment to LMI residents in a moderate-income community.
- One loan totaling \$760,000 provided funding to renovate a county office building to continue and expand its public health and referral services to LMI families in a moderate-income community.
- Two loans totaling \$590,620 provided working capital to a daycare center, primarily serving LMI families in a moderate-income community, to continue its operations. These loans are considered responsive since a lack of affordable, quality childcare can impact the workforce, particularly LMI workers.
- Two loans totaling \$505,511 provided funding to a nonprofit to purchase additional handicap accessible vehicles and hire at least two additional drivers to expand its non-

emergency transportation services, primarily to LMI individuals in a moderate-income community.

- One loan totaling \$112,000 provided funding to a nonprofit to purchase a building in a moderate-income tract to continue and expand its backpack food programs that offer LMI families free groceries for weekends and school breaks.

Affordable Housing

- One loan totaling \$375,000 to purchase a multi-family building. This loan supported 11 units of unsubsidized affordable housing in a moderate-income neighborhood.

Because Portage has been responsive to community development needs and opportunities, consideration was given to a community development loan totaling approximately \$1.3 million that benefited broader regional area (Cuyahoga County). This loan provided funding to a daycare center, primarily serving LMI families in a moderate-income community, to continue its operations.

Community Development Investments

Portage has \$708,977 in community development investments and donations.

Portage obtained a new revenue bond worth approximately \$420,000. This bond helps finance the building and renovation of various Kent State University facilities, including but not limited to housing and dining, medical and health, and research facilities. Several of these facilities are located in a moderate-income area. Portage also holds a prior period municipal bond with a current book value of approximately \$258,302. This bond helps finance the building of a community center in a moderate-income area. These bonds help to revitalize and stabilize moderate-income communities.

Qualified investments also took the form of donations totaling \$30,675. Portage partnered with 45 organizations and nonprofits to fund initiatives aimed at responding to community needs.

The following table reflects the total number community development small dollar donations by purpose, number, and dollar amount.

Purpose of CD Donation	#	\$
Services to LMI	82	\$29,525
Affordable Housing	7	\$1,150
Total	89	\$30,675

Impactful donations include but are not limited to:

- \$3,000 (three donations) to a nonprofit that provides mental health and substance abuse services, and temporary housing during rehabilitation to individuals regardless of their ability to pay.
- \$2,675 (four donations) to sponsor financial literacy materials, primarily for LMI schools.
- \$2,000 (one donation) to a nonprofit providing mammogram screenings at no cost to uninsured or underinsured LMI women.
- \$1,910 (five donations) to three community food pantries providing free food to LMI people in need.
- \$1,900 (one donation) supporting a student leadership conference benefiting multiple LMI schools.
- \$1,150 (seven donations) to a large nonprofit affordable housing organization.

Community Development Services

The following table provides a breakdown of qualified community development services by community development purpose. Employees were involved with organizations and activities that promote or facilitate, economic development, revitalization / stabilization, and to a lesser extent, community services targeted to LMI individuals.

Purpose of CD Service	# Services	# Organizations	# Employees*
Services to LMI	10	7	10
Economic Development	7	5	6
Revitalization / Stabilization	5	3	5
Total	22	15	21
*May be double-counted if employee provides multiple services Totals include loans that benefit broader regional area			

Portage’s directors, officers, and staff members provided their financial expertise to the community primarily serving on boards and committees, followed by conducting financial literacy training and providing technical assistance in the AA.

Community development services include but are not limited to the following:

- Two employees provided financial literacy training to students in an LMI school.
- One employee provided financial literacy training in partnership with three nonprofits, consisting of workshops for first-time home ownership and individual sessions covering budgeting, credit scores, loan programs, and how to apply for grants. These sessions were targeted to LMI first-time homebuyers and/or LMI individuals.
- An employee provided technical expertise to an organization explaining various program eligibility requirements for small business owners seeking community-based lending initiatives.
- Six employees served on boards/committees of six organizations/nonprofits and assisted with fundraising.

Because Portage has been responsive to community development needs and opportunities, consideration was given to a community development service that benefited the broader regional area (Stark County). An employee participated in a Junior Achievement financial literacy event attended by majority LMI students on led interactive sessions on aspects of personal finance, entrepreneurship, and workforce readiness.

Financial Education – Portage partners with Cemark and Junior Achievement and also offers proprietary curriculum:

- Cemark, Inc.¹⁵
 - How To Do Your Banking
 - A seven-lesson course in banking skills taught by school faculty as a supplement to their regular teaching curriculum. Instructional materials (with Portage’s logo) help students learn the basics of money management.
 - Saving with Mandy and Randy
 - Curriculum supplement in the form of a coloring book – addresses students’ competency in mathematics, economics, civics, and language arts.
 - Portage purchases the workbooks and donates them to schools in its footprint.
- Junior Achievement¹⁶
 - Curriculum equips high school students with foundational personal finance skills. Volunteers engage with students through a variety of activities that may include guest speaking, coaching, or advising for case study and project coursework.

¹⁵ [Cemark, Inc. - Banks](#)

¹⁶ [Junior Achievement Financial Literacy](#)

- Proprietary curriculum
 - Portage offers various courses designed to help students and/or adults learn about first-time home buying, credit building, budgeting, digital/mobile banking, and fraud awareness and cyber security programs (targeted toward seniors).

While Portage did not conduct in-person events due to the transition to virtual learning as well as social distancing guidelines that were in place during the COVID-19 emergency, Portage provided access to practical financial management resources on their website and partnered with Portage County to help deliver virtual financial literacy events. Post-COVID, Portage has returned to offering and attending in-person financial literacy events.

In 2020 Portage became an approved partner with the Bank On Rubber City initiative¹⁷ and offers accounts that meet specific standards of safety and affordability, including a low opening deposit, free debit card, and no overdraft or other hidden fees. Portage's Neighbors United Checking Account is certified to meet the Bank On account standards.

Board and Committee Memberships – Officers, managers, and staff provide financial expertise through their involvement with community development organizations throughout the AA by serving as executive directors, presidents, board members, loan committee members, or treasurers.

Technical Assistance – Employees provide technical assistance to community development organizations, typically in the form of program eligibility assistance and fundraising.

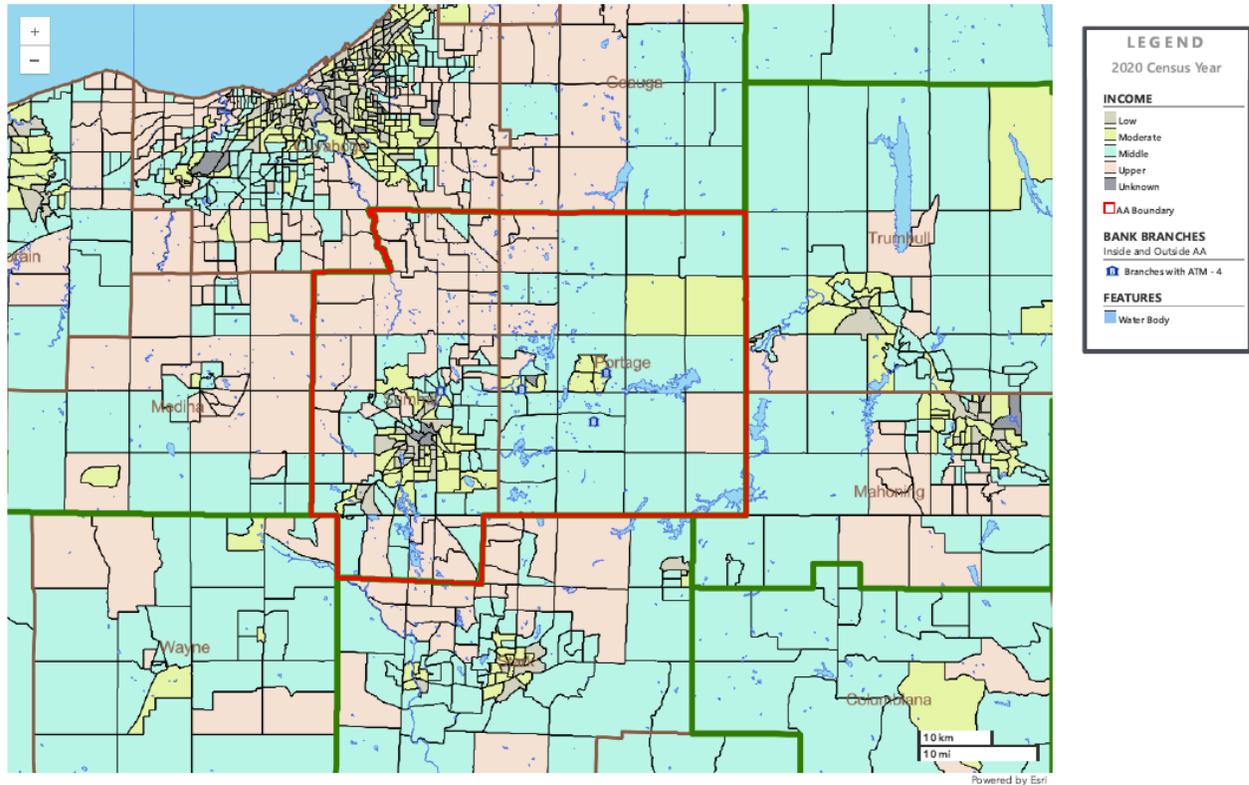
FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

An evaluation of the bank's fair lending activities was conducted during the examination to determine compliance with the substantive provisions of antidiscrimination laws and regulations, including the equal Credit Opportunity Act and the Fair Housing Act. No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

¹⁷ Bank On Rubber City is a coalition led by United Way of Summit & Medina counties and the city of Akron and is committed to helping residents, particularly LMI unbanked and underbanked residents, access safe and affordable banking products and services to help build financial sufficiency and stability.

Appendix A – Assessment Area Map

Akron, OH MSA 2022-2023



Appendix B – Demographic Tables

Combined Demographics Report

Assessment Area: Akron, OH MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	22	12.5%	13,911	7.9%	4,054	29.1%	36,691	20.7%	
Moderate-income	39	22.2%	34,182	19.3%	5,254	15.4%	31,302	17.7%	
Middle-income	66	37.5%	71,057	40.1%	3,814	5.4%	37,656	21.3%	
Upper-income	45	25.6%	57,232	32.3%	1,760	3.1%	71,453	40.3%	
Unknown-income	4	2.3%	720	0.4%	358	49.7%	0	0.0%	
Total Assessment	176	100.0%	177,102	100.0%	15,240	8.6%	177,102	100.0%	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied			Rental		Vacant		
		#	%	%	#	%	#	%	
Low-income	29,377	10,010	5.1%	34.1%	15,245	51.9%	4,122	14.0%	
Moderate-income	69,330	33,850	17.4%	48.8%	28,106	40.5%	7,374	10.6%	
Middle-income	125,581	83,508	42.8%	66.5%	32,551	25.9%	9,522	7.6%	
Upper-income	86,783	67,240	34.5%	77.5%	15,541	17.9%	4,002	4.6%	
Unknown-income	4,529	288	0.1%	6.4%	3,167	69.9%	1,074	23.7%	
Total Assessment	315,600	194,896	100.0%	61.8%	94,610	30.0%	26,094	8.3%	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	2,460	7.4%	2,190	7.3%	249	8.7%	21	6.8%	
Moderate-income	4,967	15.0%	4,512	15.1%	420	14.7%	35	11.3%	
Middle-income	12,434	37.6%	11,375	38.0%	940	32.9%	119	38.3%	
Upper-income	12,333	37.3%	11,088	37.1%	1,122	39.2%	123	39.5%	
Unknown-income	895	2.7%	753	2.5%	129	4.5%	13	4.2%	
Total Assessment	33,089	100.0%	29,918	100.0%	2,860	100.0%	311	100.0%	
Percentage of Total Businesses:			90.4%		8.6%		0.9%		
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	8	2.3%	7	2.0%	1	25.0%	0	0.0%	
Moderate-income	30	8.6%	30	8.7%	0	0.0%	0	0.0%	
Middle-income	193	55.5%	191	55.5%	2	50.0%	0	0.0%	
Upper-income	117	33.6%	116	33.7%	1	25.0%	0	0.0%	
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total Assessment	348	100.0%	344	100.0%	4	100.0%	0	0.0%	
Percentage of Total Farms:			98.9%		1.1%		0.0%		

Based on 2023 FFIEC Census Data and 2023 D&B Information

Appendix C – HMDA Lending Tables

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: Akron, OHMSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending												
		2022, 2023				Families by Family Income %	2022					2023							
		Bank		Dollar			Count		Dollar			Count		Dollar		Dollar			
		#	%	\$(000s)	\$%		#	%	Agg %	\$(000s)	\$%	\$%	#	%	Agg %	\$(000s)	\$%	Agg %	Dollar %
HOME PURCHASE	Low	44	12.3%	4,846	6.9%	20.7%	25	12.2%	9.8%	2,820	7.5%	4.9%	19	12.3%	12.2%	2,026	6.1%	6.4%	0.0%
	Moderate	87	24.2%	12,897	18.2%	17.7%	55	26.8%	21.9%	7,847	20.9%	15.7%	32	20.8%	24.6%	5,050	15.3%	18.7%	0.0%
	Middle	82	22.8%	15,036	21.3%	21.3%	46	22.4%	19.6%	8,052	21.4%	18.5%	36	23.4%	19.9%	6,984	21.1%	19.7%	0.0%
	Upper	121	33.7%	34,598	48.9%	40.3%	62	30.2%	30.4%	17,119	45.5%	44.7%	59	38.3%	24.8%	17,479	52.8%	36.8%	0.0%
	Unknown	25	7.0%	3,367	4.8%	0.0%	17	8.3%	18.4%	1,796	4.8%	16.2%	8	5.2%	18.5%	1,571	4.7%	18.5%	0.0%
	<i>Total</i>	<i>359</i>	<i>100%</i>	<i>70,744</i>	<i>100%</i>	<i>100.0%</i>	<i>205</i>	<i>100%</i>	<i>100%</i>	<i>37,634</i>	<i>100%</i>	<i>100%</i>	<i>154</i>	<i>100%</i>	<i>100%</i>	<i>33,110</i>	<i>100%</i>	<i>100%</i>	<i>0.0%</i>
REFINANCE	Low	4	5.4%	377	2.9%	20.7%	2	4.1%	10.6%	248	3.1%	5.7%	2	8.0%	16.6%	129	2.5%	10.1%	0.0%
	Moderate	14	18.9%	2,013	15.2%	17.7%	13	26.5%	22.8%	1,850	23.2%	16.8%	1	4.0%	22.9%	163	3.1%	18.8%	0.0%
	Middle	17	23.0%	2,203	16.7%	21.3%	10	20.4%	25.2%	1,251	15.7%	23.6%	7	28.0%	22.9%	952	18.2%	23.0%	0.0%
	Upper	35	47.3%	8,137	61.5%	40.3%	22	44.9%	33.5%	4,351	54.5%	44.4%	13	52.0%	28.5%	3,786	72.3%	37.6%	0.0%
	Unknown	4	5.4%	498	3.8%	0.0%	2	4.1%	7.9%	290	3.6%	9.5%	2	8.0%	9.1%	208	4.0%	10.6%	0.0%
	<i>Total</i>	<i>74</i>	<i>100%</i>	<i>13,228</i>	<i>100%</i>	<i>100.0%</i>	<i>49</i>	<i>100%</i>	<i>100%</i>	<i>7,990</i>	<i>100%</i>	<i>100%</i>	<i>25</i>	<i>100%</i>	<i>100%</i>	<i>5,238</i>	<i>100%</i>	<i>100%</i>	<i>0.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	20.7%	0	0.0%	7.2%	0	0.0%	4.6%	0	0.0%	11.2%	0	0.0%	6.2%	0.0%
	Moderate	2	50.0%	66	30.7%	17.7%	1	50.0%	19.1%	18	15.0%	14.2%	1	50.0%	21.6%	48	50.5%	16.4%	0.0%
	Middle	0	0.0%	0	0.0%	21.3%	0	0.0%	25.6%	0	0.0%	22.6%	0	0.0%	25.9%	0	0.0%	23.1%	0.0%
	Upper	1	25.0%	47	21.9%	40.3%	0	0.0%	45.8%	0	0.0%	55.7%	1	50.0%	38.0%	47	49.5%	50.8%	0.0%
	Unknown	1	25.0%	102	47.4%	0.0%	1	50.0%	2.3%	102	85.0%	2.8%	0	0.0%	3.2%	0	0.0%	3.6%	0.0%
	<i>Total</i>	<i>4</i>	<i>100%</i>	<i>215</i>	<i>100%</i>	<i>100.0%</i>	<i>2</i>	<i>100%</i>	<i>100%</i>	<i>120</i>	<i>100%</i>	<i>100%</i>	<i>2</i>	<i>100%</i>	<i>100%</i>	<i>95</i>	<i>100%</i>	<i>100%</i>	<i>0.0%</i>
MULTI FAMILY	Low	0	0.0%	0	0.0%	20.7%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	17.7%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	21.3%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	1.6%	0	0.0%	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	40.3%	0	0.0%	0.8%	0	0.0%	0.1%	0	0.0%	1.6%	0	0.0%	0.1%	0.0%
	Unknown	8	100.0%	5,723	100.0%	0.0%	6	100.0%	99.2%	4,965	100.0%	99.9%	2	100.0%	96.8%	758	100.0%	99.9%	0.0%
	<i>Total</i>	<i>8</i>	<i>100%</i>	<i>5,723</i>	<i>100%</i>	<i>100.0%</i>	<i>6</i>	<i>100%</i>	<i>100%</i>	<i>4,965</i>	<i>100%</i>	<i>100%</i>	<i>2</i>	<i>100%</i>	<i>100%</i>	<i>758</i>	<i>100%</i>	<i>100%</i>	<i>0.0%</i>
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	20.7%	0	0.0%	8.7%	0	0.0%	5.7%	0	0.0%	14.3%	0	0.0%	8.2%	0.0%
	Moderate	0	0.0%	0	0.0%	17.7%	0	0.0%	17.6%	0	0.0%	12.4%	0	0.0%	21.5%	0	0.0%	16.0%	0.0%
	Middle	0	0.0%	0	0.0%	21.3%	0	0.0%	23.7%	0	0.0%	19.5%	0	0.0%	24.9%	0	0.0%	23.1%	0.0%
	Upper	0	0.0%	0	0.0%	40.3%	0	0.0%	47.4%	0	0.0%	59.7%	0	0.0%	36.2%	0	0.0%	49.4%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	2.5%	0	0.0%	2.7%	0	0.0%	3.1%	0	0.0%	3.3%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0.0%</i>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Borrower Distribution of HMDA Loans - Table 2 of 2
Assessment Area: Akron, OH MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending												
		2022, 2023				Families by Family Income %	2022					2023							
		Bank		Dollar			Count		Dollar			Count		Dollar		Dollar			
		#	%	\$(000s)	\$%		#	%	Agg %	\$(000s)	\$%	\$%	#	%	Agg %	\$(000s)	\$%	Agg %	Dollar Agg %
OTHER PURPOSE CLOSED/EXEMPT	Low	5	22.7%	248	10.9%	20.7%	2	13.3%	11.9%	138	7.6%	7.8%	3	42.9%	14.7%	110	23.8%	10.0%	0.0%
	Moderate	1	4.5%	72	3.2%	17.7%	1	6.7%	19.2%	72	4.0%	14.8%	0	0.0%	22.9%	0	0.0%	18.9%	0.0%
	Middle	7	31.8%	796	35.1%	21.3%	6	40.0%	25.7%	700	38.8%	20.9%	1	14.3%	24.3%	96	20.8%	23.8%	0.0%
	Upper	9	40.9%	1,150	50.8%	40.3%	6	40.0%	34.4%	894	49.6%	46.5%	3	42.9%	32.3%	256	55.4%	42.3%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	8.7%	0	0.0%	9.9%	0	0.0%	5.8%	0	0.0%	5.1%	0.0%
	<i>Total</i>	<i>22</i>	<i>100%</i>	<i>2,266</i>	<i>100%</i>	<i>100.0%</i>	<i>15</i>	<i>100%</i>	<i>100%</i>	<i>1,804</i>	<i>100%</i>	<i>100%</i>	<i>7</i>	<i>100%</i>	<i>100%</i>	<i>462</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	20.7%	0	0.0%	0.6%	0	0.0%	0.3%	0	0.0%	1.0%	0	0.0%	0.5%	0.0%
	Moderate	0	0.0%	0	0.0%	17.7%	0	0.0%	2.4%	0	0.0%	1.2%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	21.3%	0	0.0%	1.2%	0	0.0%	1.5%	0	0.0%	1.0%	0	0.0%	0.7%	0.0%
	Upper	0	0.0%	0	0.0%	40.3%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	95.9%	0	0.0%	96.9%	0	0.0%	98.0%	0	0.0%	98.7%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>
HMDA TOTALS	Low	53	11.3%	5,471	5.9%	20.7%	29	10.5%	9.6%	3,206	6.1%	4.6%	24	12.6%	13.1%	2,265	5.7%	6.3%	0.0%
	Moderate	104	22.3%	15,048	16.3%	17.7%	70	25.3%	21.3%	9,787	18.6%	13.9%	34	17.9%	23.4%	5,261	13.3%	16.5%	0.0%
	Middle	106	22.7%	18,035	19.6%	21.3%	62	22.4%	22.0%	10,003	19.0%	17.8%	44	23.2%	21.5%	8,032	20.3%	18.4%	0.0%
	Upper	166	35.5%	43,932	47.7%	40.3%	90	32.5%	33.7%	22,364	42.6%	40.3%	76	40.0%	27.8%	21,568	54.4%	34.0%	0.0%
	Unknown	38	8.1%	9,690	10.5%	0.0%	26	9.4%	13.5%	7,153	13.6%	23.4%	12	6.3%	14.2%	2,537	6.4%	24.8%	0.0%
	<i>Total</i>	<i>467</i>	<i>100%</i>	<i>92,176</i>	<i>100%</i>	<i>100.0%</i>	<i>277</i>	<i>100%</i>	<i>100%</i>	<i>52,513</i>	<i>100%</i>	<i>100%</i>	<i>190</i>	<i>100%</i>	<i>100%</i>	<i>39,663</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>

Originations & Purchases
Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of HMDA Loans - Table 1 of 2
Assessment Area: Akron, OH MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending												
		2022, 2023					2022					2023							
		Bank				Owner Occupied Units %	Count			Dollar			Count		Dollar				
		Count	%	Dollar	%		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg			
#	%	\$	%	#	%	\$	%	\$	%	#	%	\$	%	\$	%				
HOME PURCHASE	Low	9	2.5%	1,045	1.5%	5.1%	6	2.9%	6.3%	547	1.5%	3.0%	3	1.9%	7.1%	498	1.5%	3.6%	0.0%
	Moderate	85	23.7%	11,010	15.6%	17.4%	47	22.9%	20.2%	5,817	15.5%	12.8%	38	24.7%	23.1%	5,193	15.7%	15.0%	0.0%
	Middle	203	56.5%	42,459	60.0%	42.8%	116	56.6%	41.2%	23,155	61.5%	38.3%	87	56.5%	39.8%	19,304	58.3%	39.0%	0.0%
	Upper	62	17.3%	16,230	22.9%	34.5%	36	17.6%	31.9%	8,115	21.6%	45.8%	26	16.9%	29.7%	8,115	24.5%	42.3%	0.0%
	Unknown	0	0.0%	0	0.0%	0.1%	0	0.0%	0.4%	0	0.0%	0.2%	0	0.0%	0.3%	0	0.0%	0.1%	0.0%
	Total	359	100%	70,744	100%	100.0%	205	100%	100%	37,634	100%	100%	154	100%	100%	33,180	100%	100%	0.0%
REFINANCE	Low	0	0.0%	0	0.0%	5.1%	0	0.0%	3.0%	0	0.0%	1.6%	0	0.0%	4.1%	0	0.0%	2.5%	0.0%
	Moderate	13	17.6%	1,505	11.4%	17.4%	9	18.4%	13.9%	1,091	13.7%	9.4%	4	16.0%	15.8%	414	7.9%	11.6%	0.0%
	Middle	39	52.7%	6,482	49.0%	42.8%	29	59.2%	43.9%	4,627	57.9%	38.9%	10	40.0%	42.5%	1,855	35.4%	39.4%	0.0%
	Upper	22	29.7%	5,241	39.6%	34.5%	11	22.4%	39.1%	2,272	28.4%	50.0%	11	44.0%	37.3%	2,969	56.7%	46.4%	0.0%
	Unknown	0	0.0%	0	0.0%	0.1%	0	0.0%	0.1%	0	0.0%	0.1%	0	0.0%	0.2%	0	0.0%	0.1%	0.0%
	Total	74	100%	13,228	100%	100.0%	49	100%	100%	7,990	100%	100%	25	100%	100%	5,238	100%	100%	0.0%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	5.1%	0	0.0%	2.4%	0	0.0%	1.0%	0	0.0%	3.0%	0	0.0%	1.7%	0.0%
	Moderate	0	0.0%	0	0.0%	17.4%	0	0.0%	10.0%	0	0.0%	6.4%	0	0.0%	14.0%	0	0.0%	8.8%	0.0%
	Middle	3	75.0%	113	52.6%	42.8%	1	50.0%	40.1%	18	15.0%	34.6%	2	100.0%	42.3%	95	100.0%	38.5%	0.0%
	Upper	1	25.0%	102	47.4%	34.5%	1	50.0%	47.5%	102	85.0%	58.0%	0	0.0%	40.6%	0	0.0%	51.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.1%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Total	4	100%	215	100%	100.0%	2	100%	100%	120	100%	100%	2	100%	100%	95	100%	100%	0.0%
MULTI FAMILY	Low	1	12.5%	210	3.7%	9.5%	0	0.0%	16.1%	0	0.0%	3.7%	1	50.0%	22.2%	210	27.7%	7.3%	0.0%
	Moderate	2	25.0%	678	11.8%	25.2%	1	16.7%	31.4%	130	2.6%	33.5%	1	50.0%	27.0%	548	72.3%	3.3%	0.0%
	Middle	5	62.5%	4,835	84.5%	36.7%	5	83.3%	30.5%	4,835	97.4%	30.0%	0	0.0%	31.7%	0	0.0%	23.7%	0.0%
	Upper	0	0.0%	0	0.0%	22.0%	0	0.0%	16.1%	0	0.0%	26.9%	0	0.0%	15.9%	0	0.0%	65.1%	0.0%
	Unknown	0	0.0%	0	0.0%	6.7%	0	0.0%	5.9%	0	0.0%	5.9%	0	0.0%	3.2%	0	0.0%	0.6%	0.0%
	Total	8	100%	5,723	100%	100.0%	6	100%	100%	4,965	100%	100%	2	100%	100%	758	100%	100%	0.0%
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	5.1%	0	0.0%	2.0%	0	0.0%	1.1%	0	0.0%	3.1%	0	0.0%	1.5%	0.0%
	Moderate	0	0.0%	0	0.0%	17.4%	0	0.0%	10.3%	0	0.0%	6.0%	0	0.0%	13.0%	0	0.0%	9.3%	0.0%
	Middle	0	0.0%	0	0.0%	42.8%	0	0.0%	39.5%	0	0.0%	33.8%	0	0.0%	41.3%	0	0.0%	34.9%	0.0%
	Upper	0	0.0%	0	0.0%	34.5%	0	0.0%	48.1%	0	0.0%	58.8%	0	0.0%	42.5%	0	0.0%	54.3%	0.0%
	Unknown	0	0.0%	0	0.0%	0.1%	0	0.0%	0.1%	0	0.0%	0.3%	0	0.0%	0.1%	0	0.0%	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0.0%

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of HMDA Loans - Table 2 of 2
Assessment Area: Akron, OH MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending												
		2022, 2023					2022						2023						
		Bank				Owner Occupied Units %	Count		Dollar		Count	Dollar		Count	Dollar		Dollar		
		Count	%	\$ (000s)	%		Bank	Agg	\$ (000s)	%		Bank	Agg		\$ (000s)	%		Agg	%
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	%		
OTHER PURPOSE CLOSED/EXEMPT	Low	1	4.5%	96	4.2%	5.1%	0	0.0%	4.6%	0	0.0%	2.9%	1	14.3%	4.2%	96	20.8%	3.8%	0.0%
	Moderate	3	13.6%	217	9.6%	17.4%	2	13.3%	17.3%	192	10.6%	10.9%	1	14.3%	14.7%	25	5.4%	12.9%	0.0%
	Middle	14	63.6%	1,143	50.4%	42.8%	9	60.0%	38.8%	802	44.5%	34.5%	5	71.4%	47.0%	341	73.8%	41.0%	0.0%
	Upper	4	18.2%	810	35.7%	34.5%	4	26.7%	39.3%	810	44.9%	51.7%	0	0.0%	34.1%	0	0.0%	42.3%	0.0%
	Unknown	0	0.0%	0	0.0%	0.1%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<i>Total</i>	<i>22</i>	<i>100%</i>	<i>2,266</i>	<i>100%</i>	<i>100.0%</i>	<i>15</i>	<i>100%</i>	<i>100%</i>	<i>1,804</i>	<i>100%</i>	<i>100%</i>	<i>7</i>	<i>100%</i>	<i>100%</i>	<i>462</i>	<i>100%</i>	<i>100%</i>	<i>0.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	5.1%	0	0.0%	6.5%	0	0.0%	2.9%	0	0.0%	2.0%	0	0.0%	0.9%	0.0%
	Moderate	0	0.0%	0	0.0%	17.4%	0	0.0%	26.5%	0	0.0%	16.2%	0	0.0%	29.6%	0	0.0%	20.6%	0.0%
	Middle	0	0.0%	0	0.0%	42.8%	0	0.0%	47.6%	0	0.0%	50.1%	0	0.0%	45.9%	0	0.0%	51.1%	0.0%
	Upper	0	0.0%	0	0.0%	34.5%	0	0.0%	18.2%	0	0.0%	29.9%	0	0.0%	22.4%	0	0.0%	27.5%	0.0%
	Unknown	0	0.0%	0	0.0%	0.1%	0	0.0%	1.2%	0	0.0%	0.8%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0.0%</i>
HMDA TOTALS	Low	11	2.4%	1,351	1.5%	5.1%	6	2.2%	4.7%	547	1.0%	2.6%	5	2.6%	5.7%	804	2.0%	3.7%	0.0%
	Moderate	103	22.1%	13,410	14.5%	17.4%	59	21.3%	16.7%	7,230	13.8%	13.9%	44	23.2%	19.7%	6,180	15.6%	12.7%	0.0%
	Middle	264	56.5%	55,032	59.7%	42.8%	160	57.8%	41.7%	33,437	63.7%	37.2%	104	54.7%	40.9%	21,595	54.4%	37.4%	0.0%
	Upper	89	19.1%	22,383	24.3%	34.5%	52	18.8%	36.6%	11,299	21.5%	45.5%	37	19.5%	33.4%	11,084	27.9%	46.1%	0.0%
	Unknown	0	0.0%	0	0.0%	0.1%	0	0.0%	0.3%	0	0.0%	0.8%	0	0.0%	0.2%	0	0.0%	0.2%	0.0%
	<i>Total</i>	<i>467</i>	<i>100%</i>	<i>92,176</i>	<i>100%</i>	<i>100.0%</i>	<i>277</i>	<i>100%</i>	<i>100%</i>	<i>52,513</i>	<i>100%</i>	<i>100%</i>	<i>190</i>	<i>100%</i>	<i>100%</i>	<i>39,663</i>	<i>100%</i>	<i>100%</i>	<i>0.0%</i>

Originations & Purchases
Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Appendix D – Glossary of Terms

Aggregate lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Census tract: A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community development: 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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

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, home equity lines of credit, 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 nonrelatives 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 is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar

amount of investments), and qualitative factors (for example, 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 do 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 applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

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 is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

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 metropolitan area/assessment area.

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on

specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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.

Other products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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.

Rated area: A rated area is a state or multistate metropolitan 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 multistate metropolitan area, the institution will receive a rating for the multistate metropolitan 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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial 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 Reports 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.

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