



PUBLIC DISCLOSURE

February 12, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Westfield Bank, FSB
Charter Number: 716697

Two Park Circle
Westfield Center, OH 44251-5001

Office of the Comptroller of the Currency
200 Public Square Suite 1610
Cleveland, OH 44144

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

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Overall CRA Rating

Institution’s CRA Rating: This institution is rated Satisfactory.

The following table indicates the performance level of Westfield Bank, FSB (Westfield or bank) with respect to the Lending, Investment, and Service Tests:

Performance Levels	Westfield Bank, FSB Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	
Low Satisfactory			X
Needs to Improve			
Substantial Noncompliance			

* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based on an adequate level of lending in the bank’s assessment areas (AAs), good lending activity, good geographic distribution of home mortgage loans and small loans to businesses, good distribution of home mortgage loans among borrowers of different incomes and small business loans among business of different sizes, and a good level of community development (CD) loans.
- The Investment Test rating is based on an overall good level of CD investments.
- The Service Test rating is based on the bank’s retail services being reasonably accessible to geographies and individuals of different income levels and an adequate level of CD services.

Lending in Assessment Area

An adequate percentage of the bank’s loans are in its AAs.

The bank originated and purchased 64.3 percent by number and 58.5 percent by dollar of its total loans inside the bank’s AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2020	532	79.5	137	20.5	669	138,056	74.3	47,875	25.7	185,931
2021	424	80.2	105	19.8	529	110,126	72.5	41,741	27.5	151,868
2022	244	77.2	72	22.8	316	75,678	69.2	33,674	30.8	109,352
Subtotal	1,200	79.3	314	20.7	1,514	323,860	72.4	123,290	27.6	447,150
Small Business										
2020	757	55.9	598	44.1	1,355	103,824	44.8	127,974	55.2	231,798
2021	407	55.5	326	44.5	733	65,528	48.1	70,745	51.9	136,273
2022	91	42.1	125	57.9	216	26,908	36.6	46,619	63.4	73,527
Subtotal	1,255	54.5	1,049	45.5	2,304	196,260	44.4	245,338	55.6	441,598
Total	2,455	64.3	1,363	35.7	3,818	520,120	58.5	369,258	41.5	888,748

Source: Bank Data; Due to rounding, totals may not equal 100.0%.

Description of Institution

Westfield is a full-service intrastate bank headquartered in Westfield Center, Ohio. The bank is a federal savings bank and a wholly owned subsidiary of Westfield Bancorp, Incorporated, a one-bank holding company also headquartered in Westfield Center, Ohio. Westfield Bancorp is a wholly owned subsidiary of Ohio Farmers Insurance Company (OFIC). OFIC is one of the nation's 50 largest property and casualty insurance groups with a network of more than 1,200 independent insurance agencies. Westfield Bancorp owns Westfield Credit Corp (WCC), an affiliate that occasionally purchases loans that exceed the bank's legal lending limit. WCC also purchases loans originated at the bank that are used to finance insurance premiums of businesses. OFIC owns several other subsidiaries related to its insurance business, sometimes known as the Westfield Group of companies. The Westfield Group offers personal and commercial insurance products and surety services throughout the United States.

As of December 31, 2022, the bank's assets totaled \$2.0 billion. As of year-end 2020 and 2021, respectively, the bank's assets totaled \$1.8 billion and \$1.9 billion. The bank offers traditional loan products, which include home mortgage, commercial, commercial real estate, small business, direct and indirect auto, and consumer loans. The bank originates home and commercial loans that are referred through its insurance agency network and provides loans to its insurance agents located throughout the country.

As of December 31, 2022, Westfield's loan portfolio totaled \$1.5 billion, with 51.3 percent of the portfolio secured by real estate. The portfolio consists of 33.5 percent commercial and industrial loans, 24.4 percent home mortgage loans, 23.0 percent non-farm, non-residential loans, 13.2 percent consumer loans, and 5.9 percent multi-family and other loans. Westfield also sells first lien residential loans to the secondary market and are not part of the bank's loan portfolio.

Westfield's consumer deposit related products and services include checking, savings, money market accounts, certificates of deposit, individual retirement accounts, online and telephone banking, mobile banking, night depository, automated teller machine (ATM) services, and e-statements. Business related

products and services include checking, savings, business money market accounts, treasury management services, ACH, account transfers, bill pay, night depository, and telephone banking. The bank also offers agency banking, which includes deposit products and services offered through insurance agencies. The agency banking products and services are similar to the personal and business banking products offered by the bank.

Westfield has four AAs, which are contiguous. The bank's primary AA is the Medina AA, which includes Medina County and six census tracts (CTs) in Cuyahoga County. The Medina AA is part of the Cleveland-Elyria-Mentor, OH Metropolitan Statistical Area (MSA). Westfield's other AAs include all of Summit County, Stark County, and Wayne County. Summit County, identified as the Summit AA, is part of the Akron, OH MSA. Stark County, identified as the Stark AA, is part of the Canton-Massillon, OH MSA. Wayne County, which is identified as the Wayne AA, is not part of an MSA.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs of the communities it serves. Westfield received a rating of "Satisfactory" at the previous CRA examination dated April 2, 2020.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The OCC evaluated the bank using large bank performance criteria, which includes a lending test, investment test, and service test. The lending test evaluates Westfield's record of meeting the credit needs of its AAs through its lending activities. The investment and service tests evaluate the bank's responsiveness to community development (CD) needs in its AAs. The evaluation period for the lending and CD tests is January 1, 2020, through December 31, 2022. In evaluating the bank's lending performance, the OCC reviewed home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA) and small loans to businesses reported under the CRA. Qualifying activities performed in response to the significant impact of the COVID-19 pandemic across the US were considered in this evaluation. Examiners did not consider consumer or farm loans in this evaluation, as these loans did not constitute a substantial majority of the bank's business.

Westfield's AAs were impacted by the 2020 U.S. Census demographic changes which took effect January 1, 2022. Examiners evaluated the bank's lending performance for the years 2020 and 2021 using 2015 American Community Survey (ACS) data. The bank's 2022 performance is evaluated separately utilizing 2020 U.S. Census data which reflects updated population and housing demographic information, as well as changes to the number and income designations of some CTs. The OCC provided more consideration to the bank's lending performance during the 2020-2021 period as it represented a longer period of performance and loan volume.

Performance between low-income and moderate-income categories was weighted equally unless otherwise noted. The loan distribution analyses compared home mortgage loans and small loans to businesses to demographic and aggregate data under the applicable Lending Test components.

Bank Response to COVID-19 Pandemic

In March 2020, the World Health Organization declared COVID-19 pandemic. Due to the shelter-in-place orders, certain businesses deemed non-essential were shut down or limited in operations. The pandemic limited the ability of bank personnel to provide in-person services. Additionally, opportunities

for virtual service deliveries were limited by the capacity of community organizations, and the ability of low- and moderate-income families and small businesses to access virtual technology. The evaluation of the bank's performance takes into consideration the impact of the pandemic.

The bank participated in the Small Business Administration's (SBA) Paycheck Protection Program (PPP), which provided small businesses impacted by the pandemic with funds to cover payroll costs or other expenses.

The pandemic disproportionately affected blue-collar jobs, in which low- and moderate-income individuals are primarily employed. To assist their borrowers experiencing financial difficulty due to the pandemic, the bank also offered a loan payment deferral relief option.

Selection of Areas for Full-Scope Review

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

Ratings

The bank's overall rating is based on its lending and CD performance within the state of Ohio. The state rating is based on performance in all the bank's AAs. Examiners gave more weight to the bank's performance within the Medina AA when determining the overall state rating as it represents the bank's most significant AA in terms of deposit concentration, branch distribution, and HMDA reportable lending. Refer to the "Scope" section under the State Rating section for details regarding how the areas were weighted in arriving at ratings.

Discriminatory or Other Illegal Credit Practices Review

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

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

State Rating

State of Ohio

CRA rating for the State of Ohio: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflected good responsiveness to AAs credit needs.
- The bank exhibited a good geographic distribution of home mortgage and small business loans in its AAs.
- The bank exhibited a good distribution of loans among individuals of different income levels and an adequate distribution of loans to business of different sizes, given the product lines offered by the institution.
- The bank had a good level of qualified CD investments and grants.
- Service delivery systems were accessible to geographies and individuals of different income levels.
- The bank provided an adequate level of CD services.

Description of Institution's Operations in Ohio

Westfield has four AAs in the state of Ohio. Examiners performed full-scope reviews of the Medina, Summit, and Stark AAs and a limited-scope review of the Wayne AA.

The bank operated seven branch offices throughout its four contiguous AAs and did not open or close any branch offices during the evaluation period. Three branches are located within the Medina AA and includes the office location of the holding company. There are two branches within the Summit AA, and one branch each within the Stark and Wayne AAs. All seven of the branch offices have similar days and hours of operation.

The bank offers deposit taking ATM services on-site at six branch offices locations. In 2022, the Westfield Center branch office relocated its full-service ATM to the Westfield Center Post Office, approximately one quarter mile from the branch. The bank also operates a full-service ATM at the Westfield Insurance location. The bank offers night deposit services at six branches, excluding only the Westfield Center branch located in the Medina AA. Drive-through services are offered at four branches, two within the Medina AA and one branch each within the Summit and Stark AAs. The bank participates in the Money Pass ATM network, which allows customers to access funds nationally without incurring surcharges. The bank also reimburses customers up to \$12 each month for out-of-network ATM fees.

The following table provides information on the demographic composition of the Medina AA for both evaluation periods.

Medina AA

Table A - Demographic Information of the Assessment Area						
Assessment Area: Medina 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	43	0.0	2.3	39.5	58.1	0.0
Population by Geography	201,881	0.0	1.4	36.4	62.1	0.0
Housing Units by Geography	80,927	0.0	1.6	37.1	61.3	0.0
Owner-Occupied Units by Geography	61,037	0.0	1.2	34.0	64.8	0.0
Occupied Rental Units by Geography	15,170	0.0	3.1	46.8	50.1	0.0
Vacant Units by Geography	4,720	0.0	1.9	45.7	52.4	0.0
Businesses by Geography	15,364	0.0	1.1	31.0	67.9	0.0
Farms by Geography	659	0.0	0.5	36.1	63.4	0.0
Family Distribution by Income Level	55,237	12.1	13.9	21.3	52.8	0.0
Household Distribution by Income Level	76,207	13.7	12.3	16.6	57.3	0.0
Median Family Income MSA – 17460 Cleveland-Elyria, OH MSA		\$65,821	Median Housing Value			\$194,316
			Median Gross Rent			\$866
			Families Below Poverty Level			4.8%

Source: 2015 ACS and 2021 D&B Data; Due to rounding, totals may not equal 100.0%; () The NA category consists of geographies that have not been assigned an income classification.*

Table A-1 Demographic Information of the Assessment Area						
Assessment Area: Medina 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	47	0.0	4.3	40.4	55.3	0.0
Population by Geography	201,825	0.0	3.2	43.1	53.7	0.0
Housing Units by Geography	81,458	0.0	4.0	45.2	50.8	0.0
Owner-Occupied Units by Geography	62,453	0.0	2.6	43.3	54.2	0.0
Occupied Rental Units by Geography	15,265	0.0	9.2	52.3	38.6	0.0
Vacant Units by Geography	3,740	0.0	6.6	49.3	44.1	0.0
Businesses by Geography	23,725	0.0	3.0	37.8	59.1	0.0
Farms by Geography	878	0.0	2.2	38.8	59.0	0.0
Family Distribution by Income Level	55,234	11.4	15.3	19.8	53.5	0.0
Household Distribution by Income Level	77,718	13.3	12.8	16.9	57.0	0.0
Median Family Income MSA – 17460 Cleveland-Elyria, OH MSA		\$76,766	Median Housing Value			\$218,240
			Median Gross Rent			\$934
			Families Below Poverty Level			3.6%

Source: 2020 U.S. Census and 2022 D&B Data; Due to rounding, totals may not equal 100.0%; () The NA category consists of geographies that have not been assigned an income classification.*

The AA consists of Medina County in its entirety as well as five contiguous CTs located within Cuyahoga County. The Medina AA is part of the Cleveland-Elyria-Mentor OH, MSA. The 2020 U.S. Census changes affected the AA. Based on 2015 ACS data, in 2020 and 2021 the AA contained 43 CTs and included no low-income CTs, one moderate-income CT, 17 middle-income CTs, and 25 upper-income CTs. Beginning in 2022, the AA includes 47 CTs and has no low-income CTs, two moderate-income CTs, 19 middle-income CTs, and 26 upper-income CTs.

The AA is highly competitive, with a mixture of community banks and large banks serving the area. Per the June 30, 2022, Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, 29 institutions operated in Medina and Cuyahoga counties, maintaining 383 offices. This does not include credit unions or other financial services providers. Westfield ranked 13th in terms of deposit market share with 1.0 percent, or \$1.0 billion of deposits in the Medina AA. The five largest competitors for deposits include KeyBank, The Huntington National Bank, PNC Bank, Citizens Bank, NA, and Third Federal Savings and Loan of Cleveland, which hold a combined 80.1 percent of the deposit market.

Significant competition for loans exists in the AA. Based on 2022 aggregate mortgage loan data, 336 lending institutions reported originating or purchasing home mortgage loans. The top five home mortgage lenders, including four large banks and a mortgage loan company with a national presence, account for 39.8 percent of the home mortgage loan market share. According to 2022 peer small business data, 142 lending institutions reported originating or purchasing small business loans. The top five small business lenders are large national banks which offered credit card products and represent 64.2 percent of the AA's small business loan market.

Economic Data

A majority of non-farm businesses in the AA are small as measured by the number of employees and gross revenues. According to 2022 Dun & Bradstreet (D&B) data, 90.2 percent of businesses located in the AA have less than \$1 million in gross annual revenues and 60.1 percent of businesses reported employing fewer than five employees. Only 1.4 percent of businesses are headquartered in the AA, while 93.2 percent operate from a single location.

Based on data from the Moody's Analytics report, Cleveland-Elyria's economy is advancing but at a considerably slower pace than its peers, Columbus and Cincinnati. The healthcare sector accounts for the majority share of new positions while consumer and financial service jobs have fallen. Single-family house prices are rising to new heights, while residential construction has tapered off. Investment in the automotive industry will help increase jobs within the AA. Area economic drivers were manufacturing, medicine, and finance. Area strengths included manufacturing infrastructure and specialized factory labor as well as world-class clinical and research healthcare institutions. Economic challenges included persistent out-migration and below-average concentrations of young residents and prime-age workers. The major employers in the MSA include Cleveland Clinic Foundation, University Hospitals, U.S. Office of Personnel Management, Minute Men Group Management Services Inc., and First Energy Corp.

Employment levels in Medina and Cuyahoga Counties from 2020 through 2022 improved. According to the U.S. Bureau of Labor Statistics (BLS), the annual Medina County unemployment rates for 2020, 2021, and 2022 totaled 7.6 percent, 4.2 percent, and 4.0 percent respectively which are slightly lower than the state of Ohio. The annual Cuyahoga County unemployment rates for 2020, 2021, and 2022 totaled 10.6 percent, 6.3 percent, and 4.9 percent respectively, which are slightly higher than the state of

Ohio. For comparison, state of Ohio annual unemployment rates for 2020, 2021, and 2022 totaled 8.3 percent, 5.1 percent, and 4.0 percent respectively.

Examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the median family income in the above table, low-income families earned less than \$32,911 in 2021 and \$38,383 in 2022, and moderate-income families earned less than \$52,657 in 2021 and \$61,413 in 2022. The maximum low-income and maximum moderate-income annual income calculations are based on 50.0 percent and 80.0 percent of the FFIEC adjusted median family income for the AA. The median housing value in the AA is \$194,316 in 2021 and \$218,240 in 2022. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30.0 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was between \$823 and \$960 for a low-income borrower and between \$1,316 and \$1,535 for a moderate-income borrower. Assuming a 30-year mortgage with a 6.0 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$1,165 and \$1,308. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA.

Community Contacts

Examiners contacted the executive director of a non-profit community-based organization serving the low-income population of the local area including Medina County. The organization facilitates the provision of supportive services and programs that promote self-sufficiency in areas including economic assistance, housing preservation, and child and family development. They provide services such as food pantry, housing initiatives, educational opportunities, and self-help programs. Community needs identified included services related to affordable housing, food, mental health, and transportation, in addition to senior citizen communication and support. Specific to low-income area residents, needs related to the lack of living wage jobs, benefits, generational poverty, fixed income limitations, and opioid epidemic impacts. Public transportation is not extensive or reliable resulting in challenges accessing jobs and medical care. The COVID-19 pandemic resulted in shuttered businesses and lack of childcare, contributing to job loss. Opportunities for participation by local financial institutions consist of financial literacy, general operating support, transportation program funding, small dollar loans for auto purchase and repair, HeadStart funding, and Volunteer Income Tax Assistance.

Examiners also reviewed information provided by the executive director of a non-profit community-based affordable housing organization. The organization serves low-income residents primarily in Cuyahoga County. The area housing stock is limited and evidences a significant affordable housing shortfall resulting from the COVID-19 pandemic and area small businesses are struggling. Identified community needs include non-tax credit investment in affordable housing, specifically in the multi-family market, financial institution creativity and flexibility particularly for credit challenged applicants and minority communities relative to small business capital, residential mortgages, home modification and repair loans.

The following table provides information on the demographic composition of the Summit AA for both evaluation periods.

Summit AA

Table B - Demographic Information of the Assessment Area						
Assessment Area: Summit 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	135	21.5	20.7	32.6	25.2	0.0
Population by Geography	541,847	13.7	21.4	33.8	31.0	0.0
Housing Units by Geography	245,237	14.4	22.5	34.9	28.2	0.0
Owner-Occupied Units by Geography	146,424	7.4	19.1	37.2	36.3	0.0
Occupied Rental Units by Geography	74,478	24.9	27.4	31.5	16.3	0.0
Vacant Units by Geography	24,335	24.9	27.6	31.8	15.7	0.0
Businesses by Geography	41,934	12.9	15.3	30.7	41.1	0.0
Farms by Geography	1,006	6.8	13.1	38.4	41.7	0.0
Family Distribution by Income Level	138,178	21.9	16.7	20.7	40.6	0.0
Household Distribution by Income Level	220,902	25.4	15.7	17.5	41.5	0.0
Median Family Income MSA - 10420 Akron, OH MSA		\$65,716	Median Housing Value			\$134,563
			Median Gross Rent			\$765
			Families Below Poverty Level			10.6%
<i>Source: 2015 ACS and 2021 D&B Data; Due to rounding, totals may not equal 100.0%; (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table B-1 Demographic Information of the Assessment Area						
Assessment Area: Summit 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	138	15.9	22.5	31.2	28.3	2.2
Population by Geography	540,428	10.9	19.7	33.9	34.1	1.4
Housing Units by Geography	246,163	11.9	22.3	34.7	29.9	1.2
Owner-Occupied Units by Geography	150,587	6.6	18.1	36.9	38.2	0.2
Occupied Rental Units by Geography	76,134	20.0	28.9	31.7	16.6	2.8
Vacant Units by Geography	19,442	21.2	28.8	29.6	17.7	2.7
Businesses by Geography	81,727	21.7	12.7	27.1	34.5	4.1
Farms by Geography	1,764	24.0	10.9	28.8	35.5	0.8
Family Distribution by Income Level	137,789	21.4	17.3	21.2	40.1	0.0
Household Distribution by Income Level	226,721	24.5	16.2	17.5	41.7	0.0
Median Family Income MSA - 10420 Akron, OH MSA		\$76,842	Median Housing Value			\$150,626
			Median Gross Rent			\$861
			Families Below Poverty Level			9.1%
<i>Source: 2020 U.S. Census and 2022 D&B Data; Due to rounding, totals may not equal 100.0%; (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The AA consists of Summit County in its entirety and is situated within the Akron, OH MSA. The 2020 U.S. Census changes affected the AA. Based on 2015 ACS data, in 2020 and 2021 the AA contained 135 CTs and included 29 low-income CTs, 28 moderate-income CTs, 44 middle-income CTs, and 34 upper-income CTs. Beginning in 2022, the AA includes 138 CTs and has 22 low-income CTs, 31 moderate-income CTs, 43 middle-income CTs, and 39 upper-income CTs. Three CTs had no income designation.

Competition for deposits in the AA is considerable, with a mixture of community banks and large banks serving the area. Per the June 30, 2022, FDIC Deposit Market Share Report, 24 institutions operate in the AA, maintaining 129 offices. This does not include credit unions or other financial services providers. Westfield ranked 11th in terms of deposit market share, with 2.2 percent, or \$383.7 million of insured deposits. The largest competitors for deposits include The Huntington National Bank, JP Morgan Chase Bank, PNC Bank, KeyBank, and Fifth Third Bank, which hold a combined 75.9 percent of the deposit market.

Significant competition for loans exists in the AA. Based on 2022 aggregate mortgage loan data, 462 lending institutions reported originating or purchasing home mortgage loans in the AA. The top five home mortgage lenders included four large banks and a mortgage loan company with a national presence which account for 32.7 percent of the home mortgage loan market share. According to 2022 peer small business data, 102 lending institutions reported originating or purchasing small business loans. The top five small business lenders are large national banks which offered credit card products and represent 63.7 percent of the AA's small business loan market.

Economic Data

A majority of non-farm businesses in the AA are small as measured by the number of employees and gross revenues. According to 2022 D&B data, 91.2 percent of businesses located in the AA have less than \$1 million in gross annual revenues and 55.7 percent of businesses reported employing fewer than five employees. Only 1.2 percent of businesses are headquartered in the AA, while 93.7 percent operate from a single location.

According to Moody's Analytics, the Akron economy is struggling, and payrolls have been flat. Manufacturing is stagnant and the healthcare sector is slowing. The labor force remains further from its pre-pandemic peak in all but a few dozen metro areas. The housing market is faring better, with a relatively modest market price correction. Area strengths include relatively low business and living costs as well as being a prime location for staffing businesses. Economic challenges include fewer jobs in high value-added services, below average per capita income, and manufacturing being vulnerable to outsourcing. The major employers in the AA include Summa Health System, Akron Children's Hospital, Cleveland Clinic, Minute Men Group Management Services Inc., and First Energy Corp.

Employment levels in the AA from 2020 through 2022 improved. According to the BLS, the annual Summit County unemployment rates for 2020, 2021, and 2022 totaled 8.4, 5.5, and 4.1 percent respectively which is slightly higher than the state of Ohio. For comparison, state of Ohio annual unemployment rates for 2020, 2021, and 2022 totaled 8.3 percent, 5.1 percent, and 4.0 percent respectively.

Community Contacts

Examiners considered information from one community organization within the Summit AA. The organization provides affordable housing through quality rental housing, practical home ownership opportunities and neighborhood-based revitalization efforts. The organization is a NeighborWorks affiliate and has seven locations. Programs include for-sale housing, homebuyer education and foreclosure prevention, home weatherization assistance program, economic development, and supportive services. Primary needs, aside from affordable housing, include supportive social services, educational support (elementary, high school and college), food resources, and career counseling.

The following table provides information on the demographic composition of the Stark AA for both evaluation periods.

Stark AA

Table C - Demographic Information of the Assessment Area						
Assessment Area: Stark 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	86	10.5	12.8	60.5	15.1	1.2
Population by Geography	374,979	6.8	11.5	63.1	18.3	0.3
Housing Units by Geography	165,462	7.4	12.3	62.9	16.8	0.5
Owner-Occupied Units by Geography	103,621	3.7	8.9	67.3	20.1	0.0
Occupied Rental Units by Geography	46,764	12.9	18.2	55.6	12.0	1.3
Vacant Units by Geography	15,077	15.8	17.9	55.6	9.1	1.6
Businesses by Geography	23,459	5.4	7.3	63.4	21.3	2.6
Farms by Geography	820	1.7	2.3	76.1	19.6	0.2
Family Distribution by Income Level	98,810	19.5	18.7	21.8	40.0	0.0
Household Distribution by Income Level	150,385	23.8	16.4	18.3	41.5	0.0
Median Family Income MSA – 15940 Canton-Massillon, OH MSA		\$59,302	Median Housing Value			\$117,788
			Median Gross Rent			\$663
			Families Below Poverty Level			10.8%

Source: 2015 ACS and 2021 D&B Data; Due to rounding, totals may not equal 100.0%; () The NA category consists of geographies that have not been assigned an income classification.*

Table C-1 Demographic Information of the Assessment Area						
Assessment Area: Stark 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	90	8.9	18.9	46.7	25.6	0.0
Population by Geography	374,853	6.7	14.7	49.6	29.0	0.0
Housing Units by Geography	166,995	7.2	16.3	49.9	26.5	0.0
Owner-Occupied Units by Geography	105,096	3.5	11.1	52.9	32.5	0.0
Occupied Rental Units by Geography	49,226	13.1	24.7	44.9	17.3	0.0
Vacant Units by Geography	12,673	15.7	27.0	44.6	12.7	0.0
Businesses by Geography	51,709	3.7	10.4	36.2	49.8	0.0
Farms by Geography	1,393	2.1	5.5	45.7	46.7	0.0
Family Distribution by Income Level	98,253	19.5	18.6	21.4	40.4	0.0
Household Distribution by Income Level	154,322	23.7	16.2	18.3	41.8	0.0
Median Family Income MSA - 38300 Pittsburgh, PA MSA		\$70,028	Median Housing Value			\$132,480
			Median Gross Rent			\$737
			Families Below Poverty Level			9.5%

Source: 2020 U.S. Census and 2022 D&B Data; Due to rounding, totals may not equal 100.0%; () The NA category consists of geographies that have not been assigned an income classification.*

The AA consists of Stark County in its entirety and is situated within the Canton-Massillon OH, MSA. The 2020 U.S. Census changes affected the AA. Based on 2015 ACS data, in 2020 and 2021 the AA contained 86 CTs and included nine low-income CTs, 11 moderate-income CTs, 52 middle-income CTs, and 13 upper-income CTs. One CT had no income designation. Beginning in 2022, the AA includes 90 CTs and has eight low-income CTs, 17 moderate-income CTs, 42 middle-income CTs, and 23 upper-income CTs.

Competition for deposits in the AA is significant, with a mixture of community banks and large banks serving the area. Per the June 30, 2022, FDIC Deposit Market Share Report, 16 institutions operate in the AA, maintaining 91 offices. This does not include credit unions or other financial services providers. Westfield ranked 10th in terms of deposit market share, with 1.8 percent, or \$163.4 million of insured deposits. The largest competitors for deposits include The Huntington National Bank, JP Morgan Chase Bank, First Commonwealth Bank, KeyBank, and Citizens Bank, which hold a combined 80.8 percent of the deposit market.

Significant competition for loans exists in the AA. Based on 2022 aggregate mortgage loan data, 375 lending institutions reported originating or purchasing home mortgage loans in the AA. The top five home mortgage lenders included three large banks and two mortgage loan companies with a national presence which account for 36.0 percent of the home mortgage loan market share. According to 2022 peer small business data, 88 lending institutions reported originating or purchasing small business loans. The top five small business lenders are large national banks which offered credit card products and represent 62.7 percent of the AA's small business loan market.

Economic Data

A majority of non-farm businesses in the AA are small as measured by the number of employees and gross revenues. According to 2022 D&B data, 92.2 percent of businesses located in the AA have less than \$1 million in gross annual revenues and 53.6 percent of businesses reported employing fewer than five employees. Only 1.1 percent of businesses are headquartered in the AA, while 93.4 percent operate from a single location.

According to Moody's Analytics, the Canton-Massillon Ohio economy has stalled. The area housing market evidenced increased home prices. Non-farm payroll growth consistently underperformed state and national rates. Broad-based weaknesses were especially prevalent in manufacturing. Healthcare contracted despite state and national growth in clinical jobs. Area economic drivers were manufacturing, energy, and resources, as well as logistics. Area strengths included significant steel industry presence, below-average business and living costs and housing affordability. Economic challenges included population decline, lack of non-healthcare related high-paying jobs, average earnings, and low educational attainment. Major employers included Aultman hospital, TimkenSteel, Mercy Medical Center, Freshmark Inc., and Diebold Inc.

Employment levels in the AA from 2020 through 2022 improved. According to the BLS, the annual Stark County unemployment rates for 2020, 2021, and 2022 totaled 8.1, 5.2, and 4.0 percent respectively which is reflective of the state of Ohio. For comparison, state of Ohio annual unemployment rates for 2020, 2021, and 2022 totaled 8.3 percent, 5.1 percent, and 4.0 percent respectively.

Community Contacts

Examiners considered information from one community organization within the Stark AA. The organization specializes in social services and works to create self-sufficiency among low-income people through job training, computer training, and job placement. They do not develop housing, but they do offer a weatherization grant and assistance program as they have identified a need for larger grant amounts for furnace replacement. Primary needs include housing assistance (affordable rental and mortgage opportunities), food resources, quality employment, and enhanced a lack of job skills.

Scope of Evaluation in Ohio

Examiners completed full-scope reviews of the Medina, Summit, and Stark AAs and a limited-scope review of the Wayne AA. Examiners gave more weight to the bank's performance within the Medina AA when determining the overall state rating as it represents the bank's most significant AA in terms of deposit concentration, branch distribution, and HMDA reportable lending. Home mortgage loans and small loans to businesses were considered equally in arriving at our overall conclusion. Examiners did not evaluate the bank's consumer or small loans to farms as neither of these are a lending focus of the bank.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Cleveland, Summit, and Stark AAs is good.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Full-Scope:							
Medina	461	489	0	11	961	38.4	61.6
Summit	379	487	0	8	874	34.9	22.4
Stark	301	218	0	2	521	20.8	9.3
Limited-Scope:							
Wayne	59	61	0	3	123	4.9	6.7
Statewide	0	0	0	24	24	1.0	0.0
Total	1,200	1,255	0	48	2,503	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans* (000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State*	%State Deposits
Full-Scope:							
Medina	\$146,600	\$66,318	0	\$17,228	\$230,146	38.1	61.6
Summit	\$88,310	\$77,389	0	\$7,878	\$173,577	28.8	22.4
Stark	\$75,363	\$38,164	0	\$2,482	\$116,009	19.2	9.3
Limited-Scope:							
Wayne	\$13,587	\$14,389	0	\$4,849	\$32,825	5.4	6.7
Statewide	0	0	0	\$51,488	\$51,488	8.5	0.0
Total	\$323,860	\$196,260	0	\$83,925	\$604,045	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Medina AA

During the evaluation period, Westfield originated 461 home loans totaling \$146.6 million and 489 small business loans totaling \$66.3 million in the Medina AA. Based on the June 30, 2022, FDIC Summary of Deposit Market Share Report, the bank ranked 13th out of 29 FDIC-insured depository institutions (top 44.8 percent) with a 1.0 percent deposit market share.

Given the competition from other reporting lenders in the AA, Westfield's lending market share is good compared to its deposit market share in the AA. Based on the 2022 peer mortgage data, for home mortgage lending, the bank ranked 26th out of 336 lenders (top 7.7 percent) with a market share of 0.9 percent. Based on the 2022 peer small business data, the bank ranked 32nd out of 142 lenders (top 22.5 percent) for number of loans, with a market share of 0.2 percent. The bank's lending performance, relative to the number of lenders in this AA, is stronger than the bank's deposit base. The bank was in the top 7.7 percent for home mortgage lending and the top 22.5 percent of small business lending compared to the top 44.8 percent for deposits.

Summit AA

During the evaluation period, Westfield originated 379 home loans totaling \$88.3 million and 487 small business loans totaling \$77.4 million in the Summit AA. Based on the June 30, 2022, FDIC Summary of Deposit Market Share Report, the bank ranked 11th out of 24 FDIC-insured depository institutions (top 45.8 percent) with a 2.2 percent deposit market share.

Given the competition from other reporting lenders in the AA, Westfield's lending market share is good compared to its deposit market share in the AA. For home mortgage lending, the bank ranked 59th out of 462 lenders (top 12.8 percent) with a market share of 0.3 percent according to 2022 peer mortgage data. Based on the 2022 peer small business data, the bank ranked 28th out of 102 lenders (top 27.5 percent) with a market share of 0.2 percent. The bank's lending performance, relative to the number of lenders in this AA, is stronger than the bank's deposit base. The bank was in the top 12.8 percent for home mortgage lending and the top 27.5 percent of small business lending compared to the top 45.8 percent for deposits.

Stark AA

During the evaluation period, Westfield originated 301 home loans totaling \$75.4 million and 218 small business loans totaling \$38.2 million in the Stark AA. Based on the June 30, 2022, FDIC Summary of Deposit Market Share Report, the bank ranked 10th out of 16 FDIC-insured depository institutions (top 62.5 percent) with a 1.8 percent deposit market share.

Given the competition from other reporting lenders in the AA and the bank's limited branch presence, Westfield's lending market share is good compared to its deposit market share in the AA. For home mortgage lending, the bank ranked 44th out of 375 lenders (top 11.7 percent) with a market share of 0.4 percent according to 2022 peer mortgage data. Based on the 2022 peer small business data, the bank ranked 24th out of 88 lenders (top 27.3 percent) with a market share of 0.4 percent. The bank's lending performance, relative to the number of lenders in this AA, is stronger than the bank's deposit base. The bank was in the top 11.7 percent for home mortgage lending and the top 27.3 percent of small business lending compared to the top 62.5 percent for deposits.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AAs.

Home Mortgage Loans

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

Overall, the bank's geographic distribution of home mortgage loans is good. In drawing a conclusion, examiners compared the bank to demographic data and aggregate lending data. Examiners also identified demographic factors of the AA that could affect the bank's ability to lend. These factors include competition from larger institutions, the bank's branch presence, and the location of most owner-occupied housing units. The economic impact of the COVID-19 pandemic created additional barriers for home mortgage lending due to the increase in job losses, a significant increase in unemployment, and an increase in demand and higher home prices, which created a shortfall of homes for sale.

Medina AA

The geographic distribution of home mortgage loans is excellent.

During 2020 and 2021, Westfield's distribution of home mortgage loans in moderate-income CTs exceeded both the percentage of owner-occupied housing units located in those CTs and the aggregate percentage of all reporting lenders. The AA had no low-income CTs.

For 2022, the bank's performance was consistent with the 2020 through 2021 performance.

Summit AA

The geographic distribution of home mortgage loans is good.

Examiners considered the lower volume of owner-occupied housing units in low-income CTs and the high percentage of occupied rental units in low-income CTs, which limits the bank's lending opportunities. For the 2020 through 2021 period, as identified in Table B above, there were only 7.4 percent or 10,835 owner-occupied housing units in low-income CTs, as compared to 24.9 percent or 18,545 occupied rental units. For the 2022 period noted in Table B-1, owner-occupied housing units declined to 6.6 percent or 9,939 units in low-income CTs, which further limited opportunities for lending in these CTs.

For 2020 through 2021, the percentage of home mortgage loans in low-income CTs was below the percentage of owner-occupied housing units and was near to the aggregate percentage of all reporting lenders. The percentage of home mortgage loans in moderate-income CTs was below the percentage of owner-occupied housing units and approximated the aggregate percentage of all reporting lenders.

The bank's lending performance in 2022 was consistent with the 2020 through 2021 period.

Stark AA

The geographic distribution of home mortgage loans is adequate.

Examiners considered the low volume of owner-occupied housing units in low-income CTs and the high percentage of occupied rental units and vacant units in low-income CTs, which limits the bank's lending opportunities. For the 2020 through 2021 period, as identified in Table C above, there were only 3.7 percent or 3,834 owner-occupied housing units in low-income CTs, as compared to 12.9 percent or 6,033 occupied rental units and 15.8 percent or 2,382 vacant housing units in low-income CTs. For the 2022 period noted in Table C-1, owner-occupied housing units declined to 3.5 percent or 3,678 units in low-income CTs, which further limited opportunities for lending in these CTs.

For 2020 through 2021, the distribution of home mortgage loans in low- and moderate- income geographies were below the percentage of owner-occupied housing units in those CTs. The distribution of home mortgage loans in low- and moderate- income geographies was near to the aggregate percentage of all reporting lenders.

During 2022, the bank's performance was stronger than the 2020 through 2021 performance. The bank's distribution of home mortgage loans in moderate- income census tracts exceeded both the percentage of owner-occupied housing units and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table Q in the state of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Overall, the bank's geographic distribution of small loans to businesses is good. Examiners gave consideration for opportunities to lend based on the number of CTs in each income level, the level of competition, and the number of non-farm businesses located in low- and moderate-income CTs within each AA.

Medina AA

The geographic distribution of small loans to businesses is good. As noted above, the Medina AA does not have any low-income CTs.

For 2020 through 2021, the distribution of small loans to businesses in moderate-income CTs was equal to the percentage of businesses. The percentage of small loans to businesses in moderate-income geographies exceeded the aggregate percentage of all reporting lenders.

In 2022, the bank's performance was weaker than the 2020 through 2021 performance as the bank made no small loans to businesses in moderate-income CTs. Competition for small business lending in moderate-income census tracts is competitive with large credit card lenders, national banks, and large regional banks dominating the market.

Summit AA

The geographic distribution of small loans to businesses was excellent.

For 2020 through 2021, the distribution of small loans to businesses in low-income CTs exceeded both the percentage of businesses located in those CTs and the aggregate percentage of all reporting lenders. The distribution of small loans to businesses in moderate-income CTs was near to both the percentage of businesses located and the aggregate percentage of all reporting lenders.

The bank's lending performance during 2022 was consistent with the 2020 through 2021.

Stark AA

The geographic distribution of small loans to businesses was good.

For 2020 through 2021, the distribution of small loans to businesses in low-income CTs was below, and in moderate-income geographies equaled, the percentage of businesses. The distribution of small loans

to businesses in low-income CTs was below, and in moderate-income CTs exceeded, the aggregate percentage of all reporting lenders.

During 2022, the bank's performance was stronger than the 2020 through 2021 performance. The assessment area had an increase in businesses in low- and moderate-income CTs. The bank's distribution of small loans to businesses exceeded both the demographic and aggregate lending comparators.

Lending Gap Analysis

The OCC analyzed Westfield's geographic lending patterns of home mortgage loans and small loans to businesses by mapping loan originations and purchases throughout the AAs. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

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

The overall borrower distribution of home mortgage loans is good.

In evaluating the borrower distribution of home mortgage loans, examiners considered the level of competition and its effect on limiting the bank's ability to lend to borrowers of different incomes, as well as the economic conditions in the AA. Examiners also considered the percentage of families that live below the poverty level, and barriers this creates for these families to qualify for home mortgage financing. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial ability to qualify for a home loan than those with income above the poverty level, without flexible terms or reduced closing costs. Additionally, the COVID-19 pandemic further exacerbated existing challenges for low-income borrowers.

Medina AA

The borrower distribution of home mortgage loans among individuals of different income levels is good.

For 2020 through 2021, the percentage of home mortgage loans to low-income borrowers was well below the percentage of the AA's low-income families but approximated the aggregate percentage of all reporting lenders which was similarly well below demographics. As noted in the description of the AA above, housing affordability in the Median AA is challenging for low-income borrowers who may find it difficult to qualify for a mortgage loan based upon maximum affordable mortgage payments. The percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of those families in the AA and was near to the aggregate percentage of all reporting lenders.

For 2022, the bank's performance was stronger than the 2020 through 2021 performance. The bank was below the percentage of low-income families in the AA and exceeded the aggregate percentage of all

reporting lenders. For lending to moderate-income borrowers, the bank exceeded the percentage of moderate-income families in the AA and was near to the aggregate percentage of all reporting lenders.

Summit AA

The borrower distribution of home mortgage loans among individuals of different income levels is good.

For 2020 through 2021, the percentage of home mortgage loans to low-income borrowers was well below the percentage of the AA's low-income families but near to the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of those families in the AA and approximated the aggregate percentage of all reporting lenders.

The bank's lending performance during 2022 was consistent with 2020 through 2021.

Stark AA

The distribution of home mortgage loans among individuals of different income levels was excellent.

For 2020 through 2021, the percentage of home mortgage loans to low-income borrowers was below the percentage of the AA's low-income families but exceeded the aggregate percentage of all reporting lenders, which was similarly below demographics. The percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of those families in the AA and was near to the aggregate percentage of all reporting lenders.

For 2022, the bank's performance was consistent with 2020 through 2021.

Small Loans to Businesses

Refer to Table R in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The overall borrower distribution of small business loans is good.

Medina AA

The distribution of loans to businesses of different sizes was adequate.

For 2020 through 2021, the percentage of loans to small businesses with revenues of \$1 million or less was well below the percentage of small businesses in the AA and below the aggregate percentage of all reporting lenders.

For 2022, the bank's performance was consistent with the 2020 through 2021 performance.

Summit AA

The distribution of small loans to businesses of different sizes was adequate.

For 2020 through 2021, the percentage of loans to small businesses with revenues of \$1 million or less was well below the percentage of small businesses in the AA and below the aggregate percentage of all reporting lenders.

The bank's lending performance in the 2022 period was weaker than the 2020 through 2021 period.

Stark AA

The distribution of small loans to businesses of different sizes was adequate.

For 2020 through 2021, the percentage of loans to small businesses with revenues of \$1 million or less was well below the percentage of small businesses in the AA but exceeded the aggregate percentage of all reporting lenders.

For 2022, the bank's performance was weaker than 2020 through 2021. The market has high competition for small business loans under \$1 million from credit card lenders, national banks, and large regional banks, and the bank's percentage of loans to small businesses was well below both the percentage of small businesses in the AA and the aggregate percentage of all reporting lenders.

Community Development Lending

The institution made a relatively high level of CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Medina AA

The level of CD lending in the Medina AA is excellent. The bank originated a total of 11 CD loans totaling \$17.2 million, which represented 13.4 percent of allocated tier 1 capital. Specifically, the bank originated six CD loans totaling \$4.8 million. Four loans, totaling \$3.9 million, were originated to three borrowers that provide affordable housing and two loans, totaling \$946,040, were originated to a borrower that targets community services to low- and moderate-income individuals. CD loans were impactful and responsive to identified community needs.

During the Covid-19 pandemic, the bank participated in the SBA's PPP loan program that provided small businesses with resources to maintain payroll, rehire laid off employees, and cover applicable overhead. The bank originated five qualified PPP loans totaling \$12.4 million within the AA. Examples of non-PPP CD loans originated in the Medina AA include:

- Refinanced an existing loan and provided a small amount of funds for improvements in a \$2.4 million loan to a housing development corporation. The loan funded a federally assisted, senior housing complex consisting of 101 units. The corporation is an affiliate of a non-profit that assists with locating and subsidizing affordable housing for low- and moderate-income individuals.

- Refinanced two maturing loans for \$397,587 and \$410,965, respectively, to a housing development corporation which is an affiliate of an area metropolitan housing authority. The corporation provides affordable housing for low- and moderate-income families through rental housing developments. The loans support a total of 50 apartment units.
- A \$719,296 loan to a limited liability corporation to finance a Low-Income Housing Tax Credit (LIHTC) multi-family, 54-unit apartment complex project. Eligible tenants are low- and moderate-income individuals that do not earn more than 80.0 percent of the Medina County median income, adjusted by family size.
- Two loans totaling \$250,000 and \$696,040 to a non-profit, community-based organization that targets low- and moderate-income individuals. Most individuals (61.1 percent) are classified as low- or moderate-income. The organization was established to assist Medina County area residents who suffer from long term mental illnesses and/or social adjustment problems. Funds provided serve to meet operating needs, particularly if government program funding is interrupted.

Summit AA

The level of CD lending was adequate. The bank made four CD loans totaling \$2.1 million, which represented 4.3 percent of allocated tier 1 capital. By dollar volume, 29.1 percent of the loans were for affordable housing and 70.9 percent funded economic development activities. These loans were responsive to identified community credit needs.

The following are examples of the bank's CD loans that illustrate the complexity, leadership, or responsiveness of the bank's CD lending:

- Originated \$100,000 loan that supported affordable housing. The loan supported property improvements for a multifamily building located in a moderate-income tract. The housing complex consists of a single residential building containing six units that are priced at the median rental rate.
- Originated a \$1.5 million loan that supported economic development. The loan supported the acquisition and construction of a new charter school located in a low-income tract. The non-profit charter school receives most of its funding from the State of Ohio. The school focuses on high school dropouts and will have a 250-student capacity.
- Originated two loans for \$502,000 that supported affordable housing. The loans provided funds for property improvements for two multi-family, 18-unit, apartment buildings. The 10-unit building was in a middle-income CT and was surrounded by moderate-income CTs. The 8-unit building is in a moderate-income CT with low-income CTs adjacent to the north and east.

Stark AA

The institution made an excellent level of CD loans consisting entirely of PPP loans greater than \$1.0 million within the Stark AA. Specifically, during the Covid -19 pandemic, the bank supported area businesses by originating four PPP loans totaling approximately \$5.8 million, which represented 30.0 percent of allocated tier 1 capital. CD loans were impactful as they were responsive to identified community needs. Examiners also considered the impact of strong and increasing competition for CD loans in this AA.

Regional or Statewide Area

During the Covid -19 pandemic, the bank supported area businesses by originating 24 PPP loans totaling \$51.5 million outside of its AAs within the broader statewide or regional area.

Product Innovation and Flexibility

The institution makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs.

Westfield offers Fannie Mae's HomeReady Mortgage product. HomeReady mortgages are similar to conventional home mortgages offered by Fannie Mae, which are intended to assist low- and moderate-income borrowers purchase or refinance homes. Specifically, HomeReady loans allow flexible sources for down payment requirements and credit scores as low as 620 as well as reducing typical downpayment and mortgage insurance requirements for qualifying borrowers. During the evaluation period, the bank originated 19 HomeReady loans totaling \$2.3 million. Of the 19 HomeReady loans, the bank originated four totaling \$551,000 within the Medina AA, four totaling \$426,000 within the Summit AA, eight totaling \$1.0 million within the Stark AA, one totaling \$116,000 within the Wayne AA, and two additional loans outside of its AAs totaling \$203,000.

The bank also offers loan products with Private Mortgage Insurance (PMI). PMI allows flexibility for borrowers possessing limited downpayment funds for conventional mortgages. During the evaluation period, the bank originated 35 PMI loans totaling \$5.0 million. Of the 35 HomeReady loans, the bank originated eight totaling \$1.2 million within the Medina AA, nine totaling \$1.2 million within the Summit AA, 15 totaling \$2.1 million within the Stark AA, one totaling \$116,000 within the Wayne AA, and three additional loans outside of its AAs totaling \$316,000.

Westfield partners with the U.S. Small Business Administration (SBA) to offer SBA guaranteed loans to entrepreneurs and small businesses. During the evaluation period, the bank originated 13 SBA loans totaling \$8.3 million. Of the 13 SBA loans, the bank originated two totaling \$491,000 within the Medina AA, two totaling \$873,000 within the Summit AA, one \$60,000 loan within the Stark AA, one \$650,000 loan within the Wayne AA, and seven additional loans outside of its AAs totaling \$6.2 million.

The bank partnered with a third-party referral program to facilitate lending for borrowers seeking Federal Housing Administration/Veterans Administration (FHA/VA) loan program financing. FHA loans are mortgages originated by FHA lenders and insured by the FHA that are designed for low- and moderate-income borrowers. FHA loans allow for credit scores and minimum down payment amounts lower than those required by conventional mortgage products. During the evaluation period, the bank referred nine borrowers for FHA/VA loans totaling \$1.6 million. Of the nine FHA/VA borrowers, the

bank referred five totaling \$1.2 million within the Medina AA, one \$95,000 loan within the Summit AA, one \$73,000 loan within the Stark AA, and two additional referrals outside of its AAs totaling \$265,000.

In response to the COVID-19 pandemic, Westfield participated in the PPP program. Within its combined AAs, the bank processed 1010 loans for \$142.6 million. The bank also assisted existing commercial, mortgage, and consumer loan borrowers by offering loan payments deferrals. The initial deferment period of 90 days could subsequently be extended for an additional 90 days. The bank granted a total of 877 deferment requests, with 135 to borrowers located in low- or moderate-income CTs.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank’s performance under the Lending Test in the Wayne AA is consistent with the bank’s overall performance under the Lending Test in the full-scope areas.

INVESTMENT TEST

The bank’s performance under the Investment Test in Ohio is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Medina and Stark AAs is good and the Summit AA is excellent.

The institution exhibits good responsiveness to credit and community economic development needs. The institution rarely uses innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments*	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full Scope										
Medina	1	\$145	18	\$5,163	19	33.9	\$5,308	21.8	0	0
Stark	4	\$622	15	\$1,030	19	33.9	\$1,652	6.8	0	0
Summit	5	\$1,404	5	\$3,789	10	17.9	\$5,193	21.3	0	0
Limited Scope										
Wayne	2	\$90	1	\$2,705	3	5.4	\$2,795	11.5	0	0
Regional/State***	2	\$9,371	3	\$15	5	8.9	\$9,386	38.6	0	0
Total	14	\$11,632	42	\$12,702	56	100.0	\$24,334	100.0	0	0

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

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

*** Statewide means investments in statewide programs that have a purpose, mandate, or function to serve one or more of the bank’s assessment areas within the state. Due to rounding, totals may not equal 100.0%.

Medina AA

The bank’s responsiveness to CD needs in the Medina AA is good. Westfield made qualified CD investments totaling approximately \$5.3 million, which represents 4.1 percent of allocated tier 1 capital. Qualified current period investments included three investments for \$5.2 million to organizations primarily focused on affordable housing for low-and moderate-income AAs. As of year-end 2022, the bank also had one prior period investment with an outstanding balance of \$145,000. Additionally, the

bank provided 15 donations totaling \$12,190 to six different organizations. These entities primarily focused on affordable housing and social services, including food pantries, clothing, and child advocacy targeted to low- and moderate-income individuals.

Summit AA

The bank's responsiveness to CD needs in the Summit AA is excellent. Westfield made qualified CD investments in the Summit AA totaling approximately \$5.2 million, which represents 11.1 percent of allocated tier one capital. The bank made five current period investments for \$3.8 million. As of year-end 2022, the bank also had five prior period investments with an outstanding balance of \$1.4 million. The bank's investments were in funds and securities backed by home mortgage loans to low- and moderate-income borrowers.

Stark AA

The bank's responsiveness to CD needs in the Stark AA is good. Westfield made qualified CD investments in the Stark AA totaling approximately \$1.7 million, which represents 8.5 percent of allocated tier one capital. The qualified current period investments include four securities for just over \$1.0 million, backed by home mortgage loans to low- and moderate-income borrowers. As of year-end 2022, the bank also had four prior period investments with an outstanding balance of \$622,279. Westfield also provided 11 separate donations totaling \$16,750 to organizations focused on affordable housing, home improvement, financial literacy courses, and mental health services to low- and moderate-income individuals.

Statewide and Regional

The bank has investments in statewide securities which includes \$9.4 million in two prior period investments in a Small Business Investment Company Fund. The bank's three investments into the Senior Housing Crime Prevention Program generated \$15,000 in dividends from qualified statewide investments that benefited senior housing facilities with a majority of low- to moderate-income residents.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Wayne AA is consistent with the bank's overall performance under the Investment Test in full-scope areas.

SERVICE TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Medina AA, Stark AA, and Summit AA is adequate.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits % of Rated Area Deposits in AA	Branch						Population			
		# of bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Medina AA	61.7	3	42.9	0.0	0.0	33.3	66.7	0.00	3.2	43.1	53.7
Stark AA	9.3	1	14.3	0.0	0.0	100.0	0.0	6.7	14.7	49.6	29.0
Summit AA	22.4	2	28.6	0.0	50.0	0.0	50.0	10.9	19.7	33.9	34.1
Wayne AA	6.6	1	14.3	0.0	0.0	100.0	0.00	0.00	7.5	73.8	19.2

Medina AA

Westfield's branches are reasonably accessible within the CTs and to individuals of different income levels in the Medina AA, considering the bank's limited branch network. Branch hours and services available do not vary in ways that inconvenience individuals of differing income levels. Overall, systems for delivering retail banking services are adequate. The bank operates three offices in the AA. Two branches are in upper-income CTs, and one is in a middle-income CT. These CTs contain 96.8 percent of the population. The AA had no low-income CTs and only one moderate-income CTs during 2020 through 2021. A change to the 2020 U.S. Census resulted in an additional moderate-income CT added for 2022. Westfield did not open any new branches in the AA during the review period, and current branches were established prior to the designation of the moderate-income CT. Each branch has a deposit taking ATM located onsite. In addition, the bank offers other alternative delivery systems, such as online banking, mobile banking, and internet banking.

Summit AA

Westfield's branches are reasonably accessible within the CTs and to individuals of different income levels in the Summit AA. Services, including where appropriate, business hours, do not vary in ways that inconvenience the needs of the AA, particularly low- and moderate-income CTs and/or individuals. Overall, systems for delivering retail banking services are adequate. The bank operates two offices in the AA, one in a moderate-income CT and one in an upper income CT, which combined represents 53.8 percent of the population. The bank did not open or close any branches in the AA during the evaluation period. The branches have deposit taking ATMs located onsite. The bank also offers other alternative delivery systems, such as online banking, mobile banking, and internet banking.

Stark AA

Westfield's branches are reasonably accessible within the geographies and to individuals of different income levels in the Stark AA, considering the bank has only one branch in the area. Branch hours and services available do not vary in ways that inconvenience individuals of differing income levels. Overall, systems for delivering retail banking services are adequate. The bank's one office is in a

middle-income CT. Additionally, the bank offers other alternative delivery systems, such as online banking, mobile banking, internet banking, and an onsite deposit taking ATM. The bank did not open or close any branches in the Stark AA during the evaluation period.

Community Development Services

The institution provides an adequate level of CD services.

Medina AA

Westfield provides an adequate level of CD services to the Medina AA. Bank personnel provide financial and technical expertise to organizations involved in affordable housing, social services for low- and moderate-income individuals, and economic development. The bank's officers and staff participated in four organizations within the AA. During the evaluation period, the employees on a combined basis provided a total of 283 hours of qualifying services. Primary examples of these service activities are detailed below.

- Bank employees are active members of committees and boards of organizations that provide financial assistance and resources to support low- and moderate-income households. One employee serves as board member on financial committee as treasurer at an organization specifically focused on low- and moderate- income individuals undergoing breast cancer treatments. Patients must qualify as low- or moderate-income through the organization's income assessment.
- Employees serve on various boards, committees, and fundraisers for organizations that provide affordable housing to low- and moderate-income households. This includes underwriting for housing loans and providing financial expertise on the board of Habitat for Humanity. Employees serve on the board of an organization focused on home improvements to qualifying low- and moderate-income households.
- A number of employees participated on a fundraising committee for a local organization providing subsidized housing, social services, and employment for low-to-moderate income individuals with disabilities. The committee focuses on one fundraiser that financially supports organizational operations and programs.

Stark AA

Westfield provides an adequate level of CD services to the Stark AA. Bank personnel provide financial and technical expertise to organizations involved in affordable housing, financial literacy programs, social services for low- and moderate-income individuals, and economic development. The bank's officers and staff participated in nine organizations within the AA. During the evaluation period, the employees on a combined basis provided a total of 316 hours of qualifying services. Primary examples of these service activities are detailed below.

- Employees serve on various boards, committees, and fundraisers that provide affordable housing to low- and moderate-income households. This includes underwriting for housing loans and providing financial expertise on the board of Habitat for Humanity. Employees serve on the board of an organization, which focuses on home improvements to qualifying low- and moderate-income households.

- Bank employees are active members on boards of organizations supporting economic development. This includes organizations providing tax abatements and 504(a) small business loans or services.

Summit AA

Westfield provided an adequate level of CD services to the Summit AA. The bank's officers and staff members participated with six organizations to provide financial and technical expertise to organizations involved in financial literacy and social services. During the evaluation period, the employees on a combined basis provided 186 hours of services. Primary examples of these service activities are detailed below.

- Bank officers and staff focus most of the community service on initiatives related to financial literacy. Staff teaches Junior Achievement financial courses and hosts finance days at various Akron schools, all with a majority of students that are considered financially disadvantaged.
- Bank employees serve on various boards and committees providing social services including housing, food drives, financial education, counseling, and employment resources to low- and moderate-income individuals.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the Wayne AA is weaker than the bank's overall performance under the Service Test in full-scope areas. Westfield provided a low level of CD services to the Wayne AA. The bank's officers and staff participated with one organization in the AA. On a combined basis, employees provided a total of 30 hours of qualifying services teaching financial literacy.

Appendix A: Scope of Examination

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

Time Period Reviewed:	January 1, 2020, to December 31, 2022	
Bank Products Reviewed:	Home mortgage loans, small business loans, community development loans, qualified investments, community development services	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Ohio		
Medina AA	Full scope	Medina County and six census tracts (CT) in Cuyahoga County
Summit AA	Full scope	Summit County
Stark AA	Full scope	Stark County
Wayne AA	Limited scope	Wayne County

Appendix B: Summary of MMSA and State Ratings

RATINGS		WESTFIELD BANK, FSB		
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Westfield Bank	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
MMSA or State:				
Ohio	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory

(*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always

equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

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

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

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

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

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

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

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

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

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

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

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an

employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

MMSA (state): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Medina	376	115,155	39.3	13,716	0.0	0.0	0.0	1.2	1.3	1.1	34.0	21.8	32.5	64.8	76.9	66.4	0.0	0.0	0.0	
Stark	231	56,229	24.2	18,003	3.7	0.9	1.3	8.9	4.3	5.3	67.3	55.8	68.0	20.1	39.0	25.3	0.0	0.0	0.0	
Summit	312	68,445	32.6	27,765	7.4	3.8	4.4	19.1	15.1	15.6	37.2	32.1	37.9	36.3	49.0	42.1	0.0	0.0	0.0	
Wayne	37	8,353	3.9	4,308	0.0	0.0	0.0	7.7	8.1	7.9	63.6	45.9	62.9	28.6	45.9	29.1	0.1	0.0	0.1	
Total	956	248,182	100.0	63,792	4.3	1.5	2.3	11.8	6.8	9.1	48.2	34.3	46.9	35.8	57.4	41.7	0.0	0.0	0.0	

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Medina	85	31,445	34.8	7,531	0.0	0.0	0.0	2.6	3.5	3.1	43.3	32.9	40.6	54.2	63.5	56.3	0.0	0.0	0.0	
Stark	70	19,134	28.7	12,230	3.5	2.9	2.7	11.1	12.9	11.2	52.9	50.0	52.9	32.5	34.3	33.2	0.0	0.0	0.0	
Summit	67	19,865	27.5	18,303	6.6	3.0	6.0	18.1	14.9	17.2	36.9	37.3	37.5	38.2	44.8	39.0	0.2	0.0	0.4	
Wayne	22	5,234	9.0	2,894	0.0	0.0	0.0	5.3	4.5	6.5	72.7	72.7	70.7	22.0	22.7	22.8	0.0	0.0	0.0	
Total	244	75,678	100.0	40,958	3.9	1.6	3.5	12.1	9.4	12.0	46.2	42.6	45.0	37.8	46.3	39.3	0.1	0.0	0.2	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Medina	376	115,155	39.3	13,716	12.1	5.1	5.6	13.9	14.1	15.4	21.3	13.6	22.9	52.8	63.8	44.0	0.0	3.5	12.2	
Stark	231	56,229	24.2	18,003	19.5	10.0	8.2	18.7	19.0	19.9	21.8	13.0	22.7	40.0	55.8	33.6	0.0	2.2	15.5	
Summit	312	68,445	32.6	27,765	21.9	10.6	12.5	16.7	20.8	21.1	20.7	14.1	20.3	40.6	50.0	31.7	0.0	4.5	14.4	
Wayne	37	8,353	3.9	4,308	16.0	2.7	5.1	18.5	21.6	19.6	21.9	13.5	24.8	43.6	59.5	37.7	0.0	2.7	12.9	
Total	956	248,182	100.0	63,792	18.9	8.0	9.3	17.0	17.8	19.4	21.3	13.6	21.9	42.8	57.2	35.3	0.0	3.5	14.1	

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Medina	85	31,445	34.8	7,531	11.4	7.1	6.0	15.3	16.5	17.5	19.8	15.3	23.5	53.5	57.6	42.1	0.0	3.5	10.9	
Stark	70	19,134	28.7	12,230	19.5	12.9	10.1	18.6	21.4	23.1	21.4	12.9	22.4	40.4	47.1	30.5	0.0	5.7	13.9	
Summit	67	19,865	27.5	18,303	21.4	11.9	10.2	17.3	17.9	21.6	21.2	11.9	20.9	40.1	47.8	33.2	0.0	10.4	14.1	
Wayne	22	5,234	9.0	2,894	15.0	9.1	7.1	17.1	22.7	22.0	23.9	9.1	25.1	44.0	54.5	33.8	0.0	4.5	12.0	
Total	244	75,678	100.0	40,958	18.5	10.2	9.2	17.3	18.9	21.3	21.3	13.1	22.1	42.9	51.6	34.0	0.0	6.1	13.3	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2020-21**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Medina	458	57,380	39.3	5,485	0.0	0.0	0.0	1.1	1.1	0.9	31.0	40.4	30.1	67.9	58.5	69.0	0.0	0.0	0.0
Stark	192	31,135	16.5	6,734	5.4	2.6	5.3	7.3	7.3	6.1	63.4	58.3	61.8	21.3	29.7	25.0	2.6	2.1	1.8
Summit	460	69,635	39.5	12,745	12.9	16.3	11.3	15.3	13.5	14.3	30.7	29.1	31.2	41.1	41.1	43.2	0.0	0.0	0.0
Wayne	54	11,202	4.6	1,895	0.0	0.0	0.0	11.4	9.3	9.6	63.8	70.4	65.6	24.7	20.4	24.8	0.1	0.0	0.0
Total	1,164	169,352	100.0	26,859	7.6	6.9	6.7	10.4	7.4	9.2	42.1	40.3	41.1	39.2	45.1	42.6	0.7	0.3	0.5

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Medina	31	8,938	34.1	4,685	0.0	0.0	0.0	3.0	0.0	2.1	37.8	45.2	37.7	59.1	54.8	60.2	0.0	0.0	0.0
Stark	26	7,029	28.6	6,444	3.7	7.7	4.6	10.4	11.5	10.1	36.2	38.5	48.5	49.8	42.3	36.8	0.0	0.0	0.0
Summit	27	7,754	29.7	11,814	21.7	7.4	7.7	12.7	18.5	14.4	27.1	51.9	31.3	34.5	18.5	44.8	4.1	3.7	1.7
Wayne	7	3,187	7.7	2,198	0.0	0.0	0.0	6.3	0.0	6.9	77.6	100.0	74.3	16.1	0.0	18.7	0.0	0.0	0.0
Total	91	26,908	100.0	25,141	11.7	4.4	4.8	10.2	8.8	10.4	34.7	49.5	40.7	41.5	36.3	43.4	2.0	1.1	0.8

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-21	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Medina	458	57,380	39.3	5,485	84.2	43.0	54.2	5.7	31.0	10.1	26.0	
Stark	192	31,135	16.5	6,734	82.5	53.6	46.3	5.9	27.6	11.6	18.8	
Summit	460	69,635	39.5	12,745	82.8	39.3	49.3	6.3	28.5	11.0	32.2	
Wayne	54	11,202	4.6	1,895	82.0	44.4	50.4	6.3	42.6	11.6	13.0	
Total	1,164	169,352	100.0	26,859	82.9	43.4	49.6	6.1	30.0	11.0	26.6	

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Medina	31	8,938	34.1	4,685	89.9	45.2	50.5	3.6	54.8	6.5	0.0	
Stark	26	7,029	28.6	6,444	92.0	19.2	49.1	2.6	80.8	5.4	0.0	
Summit	27	7,754	29.7	11,814	91.0	25.9	49.9	3.2	74.1	5.8	0.0	
Wayne	7	3,187	7.7	2,198	88.4	28.6	47.8	3.9	71.4	7.7	0.0	
Total	91	26,908	100.0	25,141	91.0	30.8	49.6	3.1	69.2	5.9	0.0	

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%