



Community Reinvestment Act CRA

Public File

April 1, 2025

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Community Reinvestment Act Statement

March 24, 2025

The Board of Directors and senior management will take an active role in assuring compliance with the Community Reinvestment Act. The Board will review and approve the bank's delineated assessment area, at least annually or after a material change. The Board has established Clinton County and Highland County as its delineated assessment area. This delineation is primarily based upon the rural nature of the counties and our commitment to address the economic development and future welfare of these communities. The bank will make reasonable efforts to ascertain the credit needs of the communities and to develop and market products and services to meet those needs. The bank's directors, officers, and employees are encouraged to be familiar with the bank's CRA goals. It is the bank's policy to comply with the standards imposed by CRA and related regulations by making safe and sound loans and investments. The bank uses innovative and flexible lending standards in accordance with safe and sound guidelines to address the credit needs of all applicants including low-to-moderate income levels or their geographies. We ascertain the credit needs of the communities through direct contact with various community leaders and participation in community organizations, conversations with realtors, business owners, or any other media source. This institution does not discriminate against any applicant for credit based on sex, including actual or perceived nonconformity with traditional sex- or gender-based stereotypes, and discrimination based on an applicant's social or other associations, marital status, race, color, religion, national origin, age, or receipt of income from public assistance.

As a mutual company, Wilmington Savings Bank has elected to predominately accept deposits from individuals who either work or live in Clinton County and contiguous counties due to our desire to maintain the bank as a local, independent, community organization.

Written Comments

All written comments received by the public for the current year and each of the prior two calendar years that specifically relate to Wilmington Savings Bank's "WSB's" performance in helping to meet community credit needs, and any response to the comments by WSB, if neither the comments nor the responses contain statements that reflect adversely on the good name or reputation of any persons other than the bank or publication of which would violate specific provisions of law.

	2024	2023
Written Public Comments Received	0	0

CRA Public Performance Evaluation

PUBLIC DISCLOSURE

December 30, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Wilmington Savings Bank
Certificate Number: 31539

184 North South Street
Wilmington, Ohio 45177

Federal Deposit Insurance Corporation
Division of Depositor and Consumer Protection
Chicago Regional Office

300 South Riverside Plaza, Suite 1700
Chicago, Illinois 60606

This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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INSTITUTION RATING

INSTITUTION'S CRA RATING: This institution is rated Satisfactory.

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

The Wilmington Savings Bank's (TWSB) satisfactory performance under the Interagency Institution Examination Procedures is summarized below.

- The loan-to-deposit (LTD) ratio is more than reasonable given the institution's size, financial condition, and assessment area credit needs.
- A majority of loans and other lending related activities are in the institution's assessment area.
- The geographic distribution of loans reflects excellent dispersion throughout the assessment area.
- The distribution of borrowers reflects, given the demographics of the assessments area, reasonable penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes.
- The institution did not receive any CRA-related complaints since the previous evaluation; therefore, this factor did not affect the Lending Test rating.

DESCRIPTION OF INSTITUTION

Background

TWSB is headquartered in Wilmington, Ohio and operates northeast of Cincinnati. TWSB received a Satisfactory rating at its previous FDIC Performance Evaluation, dated July 29, 2013, based on Interagency Small Institution CRA Examination Procedures.

Operations

TWSB operates two offices. The main office is in Wilmington, Ohio located in a moderate-income tract in Clinton County. The bank converted the Hillsboro, Ohio loan production office (LPO) to a branch October 11, 2017. The Hillsboro office is located in Highland County also in a moderate-income tract. The bank offers loan products including home mortgage, commercial, agricultural, and consumer loans, primarily focusing on home mortgage and commercial lending. Mortgage loans include 15- and 30- year fixed rate, adjustable rate, and home equity lines of credit. Commercial lending products include commercial real estate loans, commercial lines of credit, and small business loans. The bank sells mortgages on the secondary market. A variety of deposit services are also available including personal and business checking accounts, savings accounts, certificates of deposit, money market accounts, and Individual Retirement Accounts. Alternative

banking services are internet banking, including electronic bill-pay and mobile banking, 24-hour telephone banking, automated teller machines, and drive-up facilities at the Wilmington office. The bank maintains a website at www.wilmingtonsavings.com. The bank opened LPOs in Hillsboro and Milford, Ohio in 2017. As previously mentioned, the Hillsboro LPO was converted to a branch while the Milford LPO was closed in early 2018. The bank did not engage in any merger or acquisition activity since the previous evaluation.

Ability and Capacity

Assets totaled approximately \$162 million as of September 30, 2019 Consolidated Report of Condition; loans totaled \$130 million and deposits totaled \$119 million. As of the same date, the net loans to total deposits ratio was 108.2 percent, and the net loans to total assets ratio was 102.4 percent. The makeup of TWSB's loan portfolio as of September 30, 2019, is shown below.

Loan Portfolio Distribution as of 9/30/2019		
Loan Category	\$(000s)	%
Construction and Land Development	1,353	1.0
Secured by Farmland	248	0.2
1-4 Family Residential	101,128	78.0
Multi-family (5 or more) Residential	6,861	5.3
Commercial Real Estate	15,706	12.1
Total Real Estate Loans	125,296	96.6
Commercial and Industrial	1,675	1.3
Agricultural	0	0.0
Consumer	2,457	1.9
Other	262	0.2
Less: Unearned Income	(0)	(0.0)
Total Loans	129,690	100.0
<i>Source: Reports of Income and Condition</i>		

Examiners did not identify any financial, legal, or other impediments that affect the bank's ability to meet assessment area credit needs.

DESCRIPTION OF ASSESSMENT AREA

The CRA requires each financial institution to define one or more assessment areas within which its CRA performance will be evaluated. TWSB has designated one assessment area located in the Ohio Non-Metropolitan Statistical Area (Non-MSA). The assessment area consists of whole geographies, does not arbitrarily exclude low- and moderate-income areas, and includes all of the geographies where the bank's offices are located.

The Ohio Non-MSA assessment area encompasses both Clinton and Highland counties. The bank's Ohio Non-MSA assessment area was changed to include Highland County with the opening of a branch in Hillsboro, Ohio since the last evaluation. The Ohio assessment area is located northeast of Cincinnati, Ohio. The following table details the breakdown of counties, census tracts, and bank offices for the assessment area.

Description of Assessment Area			
Assessment Area	Counties in Assessment Area	# of Census Tracts	# of Offices
Ohio Non-MSA	Clinton	9	1
	Highland	9	1

Source: Bank Records

Refer to the Description of Institution's Operations sections of this evaluation for more detailed demographic and economic information for the assessment area.

Economic and Demographic Data

This assessment area includes 18 census tracts. These tracts reflect the following income designations according to the 2015 American Community Survey (ACS):

- 0 low-income tracts,
- 6 moderate-income tracts,
- 11 middle-income tracts, and
- 1 upper-income tract.

The following table illustrates select demographics of the assessment area based on the 2015 ACS data.

Demographic Information of the Assessment Area						
Assessment Area: Wilmington AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	18	0.0	33.3	61.1	5.6	0.0
Population by Geography	85,062	0.0	28.8	65.0	6.2	0.0
Housing Units by Geography	37,319	0.0	30.0	64.6	5.4	0.0
Owner-Occupied Units by Geography	22,139	0.0	23.6	69.3	7.0	0.0
Occupied Rental Units by Geography	10,630	0.0	43.1	53.8	3.1	0.0
Vacant Units by Geography	4,550	0.0	30.9	66.7	2.5	0.0
Businesses by Geography	3,928	0.0	40.4	52.3	7.4	0.0
Farms by Geography	442	0.0	12.4	75.1	12.4	0.0
Family Distribution by Income Level	22,336	23.8	18.1	22.0	36.1	0.0
Household Distribution by Income Level	32,769	25.0	17.2	18.5	39.3	0.0
Median Family Income Non-MSAs - OH		\$56,217	Median Housing Value			\$110,681
			Median Gross Rent			\$677
			Families Below Poverty Level			14.5%

Source: 2015 ACS Census and 2018 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.

Housing units total 37,319, of which 59.3 percent are owner-occupied, 27.8 percent are occupied rental units, and 12.2 percent are vacant units. The Geographic Distribution of Loans criterion compares the home mortgage loans to the distribution of owner-occupied housing units by census tract income level.

The local economy in the assessment area is still trying to recover from the 2009 loss of the DHL hub at Wilmington Air Park, which resulted in a loss of 7,000 jobs. Amazon established a building and operates an air hub at the Wilmington Air Park since the last evaluation. Data obtained from the U.S. Bureau of Labor Statistics indicates that the unemployment rates in the assessment area counties are above both the Ohio statewide unemployment rate and national unemployment rates. As of October 2019, the Ohio statewide unemployment rate was 3.9 percent and the national rate is 3.3 percent. The unemployment rates in Clinton and Highland counties were 4.5 and 4.9 percent, respectively, for this same timeframe.

According to the 2018 D&B data, 3,928 non-farm businesses are present in this area. In addition, 67.2 percent of the businesses have 4 or fewer employees, and 85.2 percent operate from a single location. The analysis of small business loans under the Borrower Profile criterion compares the distribution of businesses by gross annual revenue (GAR) level to the bank's lending. The GARs for those businesses are as follows:

- 77.8 percent reported revenues of \$1 million and less.
- 5.5 percent reported revenues over \$1 million.
- 16.7 percent have unknown revenues.

Major industries in the area are services at 37.4 percent; retail trade at 13.7 percent; agricultural, forestry, and fishing at 10.1 percent; non-classifiable establishments at 9.1 percent; construction at 7.6 percent; and finance, insurance, and real estate at 6.8 percent. Major employers in Clinton County include Ahresty Wilmington Corporation, Alkermes Incorporated, ATSG/ABX Air, Clinton Memorial Hospital, and Ferno-Wahington Incorporated. Major employers in Highland County include Adient/Johnson Controls, Greenfield Exempted Village Schools, Greenfield Research, Highland District Hospital, and Hillsboro City Schools.

Examiners use the FFIEC median family income to analyze home mortgage loans under the Borrower Profile criterion. The following table presents the low-, moderate-, middle-, and upper-income categories.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
OH NA Median Family Income (99999)				
2018 (\$61,400)	<\$30,700	\$30,700 to <\$49,120	\$49,120 to <\$73,680	≥\$73,680
<i>Source: FFIEC</i>				

Competition

The assessment area is highly competitive in the market of financial services. According to the FDIC Deposit Market Share data as of June 30, 2019, 15 institutions operated 33 full-service offices within the assessment area. Of these institutions, TWSB was ranked fifth with 3.3 percent deposit market share. The top four banks make up 87.5 percent of the market share.

The bank is not required to collect or report its home mortgage loan data, and it has not elected to do so. Therefore, the analysis of home mortgage loans under the Lending Test does not include comparisons against aggregate data. However, aggregate home mortgage data is helpful in identifying the level of demand for such loans in the assessment area. In 2018, 176 lenders reported 3,146 residential mortgage loans originated or purchased, reflecting a high level of competition for home mortgage loans among banks, credit unions, and non-depository mortgage lenders. The ten most prominent home mortgage lenders accounted for 44.1 percent of total market share by number.

Additionally, the bank is not required to collect or report its small business loan data, and it has not elected to do so. Therefore, the analysis of small business loans under the Lending Test does not include comparisons against aggregate data. The aggregate data, however, reflects the level of demand for small business loans and is therefore included here for informational purposes only. In 2017, 42 lenders reported 544 small business loans in the assessment area, indicating a high level of competition for this product. The ten most prominent small business lenders accounted for 80.2 percent of the total market share by number.

Community Contact

As part of the evaluation, examiners contact third parties active in the assessment area to assist in identifying credit needs. This information helps determine whether local financial institutions are responsive to these needs. It also shows what credit opportunities are available.

Examiners reviewed one community contact for this assessment area with an economic development organization. The organization indicated that the biggest need in the assessment area is affordable housing, with a particular need for loans to rehabilitate affordable housing, and small business loans. The contact said a large portion of the affordable housing in the assessment area is outdated and in need of improvement. According to demographic data, the median housing value of \$110,681 and median year built of 1976 supports these statements. The contact indicated that, overall, financial institutions are meeting the credit needs of the community; however, loan products to rehabilitate the aging housing market would be helpful. Stating further that low- and moderate-income borrowers have trouble finding affordable housing that is not in need of repair.

Credit Needs

As stated above the community contact indicated that affordable housing and loan products to rehabilitate the aging housing market are needed. The median average of the available housing stock was built in 1976 and supports this statement.

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the prior evaluation dated July 29, 2013, to the current evaluation dated December 30, 2019. Examiners used the Interagency Small Institution CRA Examination Procedures to evaluate TWSB's CRA performance. These procedures include a review of the bank's performance based upon the following criteria.

- Loan-to-deposit ratio
- Assessment area concentration
- Geographic distribution
- Borrower profile
- Response to CRA-related complaints

This evaluation does not include any lending activity performed by affiliates.

Activities Reviewed

Examiners determined that the bank's major product lines are home mortgage and small business loans. This conclusion considered the bank's business strategy and the number and dollar volume of loans originated during the evaluation period. Please refer to the Glossary for definitions of these loan products. Home mortgage lending received greater weight in this evaluation, as they represent a higher concentration of originations during the evaluation period. Furthermore, no other loan types, such as small farm or consumer lending, represent a major product line. Therefore, they provided no material support for conclusions or ratings and are not presented. The bank is not subject to the data collection requirements of the Home Mortgage Disclosure Act (HMDA).

Bank records indicated that the lending focus and product mix remained consistent throughout the evaluation period. Examiners reviewed all home mortgage and small business originated in 2018. The bank's lending performance in 2018 was considered representative of performance throughout the entire evaluation period. While the bank is not required to collect or report home mortgages or small business, the information was readily available in bank records. For the Lending Test, examiners reviewed the number and dollar volume of home mortgage and small business loans. While number and dollar volume of loans are presented, examiners emphasized performance by number of loans, because the number of loans is a better indicator of the individuals and businesses served.

The 2015 ACS and 2018 D&B data is the demographic data used in this evaluation.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

TWSB demonstrated reasonable performance under the Lending Test. The bank's performance under the Geographic Distribution and Borrower Profile criterions primarily support this conclusion.

Loan-to-Deposit Ratio

The LTD ratio is more than reasonable given the institution's size, financial condition, and assessment area credit needs. The bank's LTD ratio, calculated from Call Report data, averaged 105.8 percent over the past 25 calendar quarters from September 30, 2013, to September 30, 2019. The ratio ranged from a high of 125.6 percent at December 31, 2018 to a low of 88.4 percent at March 31, 2015 during the evaluation period. Examiners selected comparable institutions based on their asset size, geographic location, and lending focus. As shown in the following table, TWSB maintained a ratio higher than both of the similarly situated institutions.

Loan-to-Deposit Ratio Comparison		
Bank	Total Assets as of 9/30/19	Average Net LTD Ratio
	\$(000s)	(%)
The Wilmington Savings Bank	141,444	105.8
Similarly-Situated Institution #1	61,755	75.7
Similarly-Situated Institution #2	159,559	81.8

Source: Reports of Condition and Income 9/30/13 through 9/30/19

Assessment Area Concentration

The bank originated a majority of its home mortgage and small business loans, by number and dollar amount, within its assessment area. See the following table.

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										
2018	59	70.2	25	29.8	84	7,870	55.3	6,363	44.7	14,233
Small Business										
2018	13	81.3	3	18.8	16	1,797	60.8	1,157	39.2	2,954
Total	72	72.0	28	28.0	100	9,667	56.2	7,520	43.8	17,187

*Source: Evaluation Period: 1/1/2018 - 12/31/2018 Bank Data
Due to rounding, totals may not equal 100.0*

Geographic Distribution

The geographic distribution of loans reflects excellent dispersion throughout the assessment area. The bank's excellent performance with respect to home mortgage and reasonable performance with respect to small business supports this conclusion. Additionally, both of the bank's offices are located in moderate-income census tracts which further support the TWSB's efforts to reach out and lend to these areas. Given that this assessment area does not contain any low-income census tracts, examiners focused on the percentage by number of loans in the moderate-income census tracts.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects excellent dispersion throughout the assessment area. As shown in the following table, lending in the moderate-income census tracts was 37.3 percent, which exceeded the 23.6 percent owner-occupied housing level. The favorable comparison of the bank's lending in the moderate-income census tracts to the owner-occupied housing level illustrates excellent performance in moderate census tracts.

Geographic Distribution of Home Mortgage Loans					
Tract Income Level	% of Owner-Occupied Housing Units	#	%	\$(000s)	%
Moderate	23.6	22	37.3	2,544	32.3
Middle	69.3	28	47.5	3,425	43.5
Upper	7.0	9	15.3	1,901	24.2
Totals	100.0	59	100.0	7,870	100.0

*Source: 2015 ACS Census; 1/1/2018 - 12/31/2018 Bank Data
Due to rounding, totals may not equal 100.0*

Small Business Loans

The geographic distribution of small business loans, shown in the following table, reflects reasonable dispersion throughout the assessment area. D&B data indicates that 40.4 percent of businesses are located in moderate-income census tracts, and the bank made 46.2 percent of its small business loans in moderate-income tracts.

Geographic Distribution of Small Business Loans					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Moderate	40.4	6	46.2	975	54.3
Middle	52.3	4	30.8	486	27.0
Upper	7.4	3	23.1	336	18.7
Totals	100.0	13	100.0	1,797	100.0

*Source: 2018 D&B Data; 1/1/2018 - 12/31/2018 Bank Data
Due to rounding, totals may not equal 100.0*

Borrower Profile

The distribution of loans to borrowers reflects reasonable penetration among individuals of different income levels and among businesses of different sizes. Examiners focused on the percentage by number of home mortgage loans to low- and moderate-income borrowers. They also focused on the percentage by number of loans to businesses with GARs of \$1.0 million or less.

Home Mortgage Loans

The distribution of home mortgage loans is reasonable to individuals of different income levels, including low- and moderate-income borrowers, based upon a comparison to the percentage of families in each income level. The bank's lending to low-income borrowers trailed demographic in

2018. However, 14.5 percent of the families had incomes below the poverty level. Due to their limited financial resources, families with incomes below the poverty level have difficulty affording a home; limiting the demand and opportunity for lending to low-income borrowers.

In 2018, the bank originated 15.3 percent of its loans to moderate-income borrowers, which fell short of the 18.1 percent of families in the assessment area. Even though the bank is not a HMDA reporter, a review of HMDA aggregate data for 2018 revealed significant competition for home mortgage loans in the assessment area. There were 176 reporting entities originating 3,146 home mortgage loans in the assessment area with a total dollar volume of \$351,540 million. The top 10 lenders in the assessment area comprised 44.1 percent of the market share. This is highly reflective of the intense competition the bank faces. The following table details the bank's mortgage lending by borrower income level in the assessment area.

Distribution of Home Mortgage Loans by Borrower Income Level					
Borrower Income Level	% of Families	#	%	\$(000s)	%
Low	23.8	7	11.9	305	3.9
Moderate	18.1	9	15.3	807	10.3
Middle	22.0	13	22.0	1,640	20.8
Upper	36.1	30	50.8	5,118	65.0
Totals	100.0	59	100.0	7,870	100.0
<i>Source: 2015 ACS Census; 1/1/2018 - 12/31/2018 Bank Data Due to rounding, totals may not equal 100.0</i>					

Small Business Loans

The distribution of small business loans, as shown in the following table, reflects reasonable penetration of loans to businesses with GARs of \$1 million or less. While the majority of the bank's lending was to small businesses, the bank's performance fell below the percentage of businesses in the assessment area. However, it should be noted that the percentage of businesses operating with GARs of \$1 million or less is not an indication that such businesses are actually seeking traditional financing. Additionally, many small businesses seek financing through other non-traditional avenues, for example business credit cards. Lastly, as mentioned previously, there is a high level of competition for small business loans in this assessment area. The bank's level of lending reflects a willingness to lend to businesses of all sizes. Therefore, the bank's performance is reasonable.

Distribution of Small Business Loans by Gross Annual Revenue Category					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000	77.9	9	69.2	743	41.3
>1,000,000	5.5	2	15.4	556	30.9
Revenue Not Available	16.7	2	15.4	498	27.8
Totals	100.0	13	100.0	1,797	100.0
<i>Source: 2018 D&B Data; 1/1/2018 - 12/31/2018 Bank Data Due to rounding, totals may not equal 100.0</i>					

Response to Complaints

The bank did not receive any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the rating.

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Examiners did not identify any evidence of discriminatory or other illegal credit practices inconsistent with meeting community credit needs was identified; therefore, this consideration did not affect the institution's overall CRA rating.

APPENDICES

SMALL BANK PERFORMANCE CRITERIA

Lending Test

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by considering the following criteria:

- 1) The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
- 2) The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
- 3) The bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes;
- 4) The geographic distribution of the bank's loans; and
- 5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

GLOSSARY

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

Area Median Income: The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

Assessment Area: A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

Census Tract: A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

Combined Statistical Area (CSA): A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

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

Core Based Statistical Area (CBSA): The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

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. Other family 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).

FFIEC-Estimated Income Data: The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in

information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

Full-Scope Review: A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower profile, 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 do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

Home Mortgage Loans: Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

Housing Unit: Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

Limited-Scope Review: A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is often analyzed using only quantitative factors (e.g., geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

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

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

Median Income: The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

Metropolitan Division (MD): A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities 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 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 and less than 80 percent in the case of a geography.

Multi-family: Refers to a residential structure that contains five or more units.

Nonmetropolitan Area (also known as non-MSA): All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

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.

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

Rural Area: Territories, populations, and housing units that are not classified as urban.

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

Small Farm Loan: 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, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

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

Urban Area: All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, “urban” consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

“Urban” excludes the rural portions of “extended cities”; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.

Branch Locations

Wilmington Office

184 N. South Street
 Wilmington, OH 45177
 Phone: 937-382-1659
 Toll Free: 800-951-9958
 www.wilmingtonsavings.com

Hours of Operation:

Monday-Thursday 8:30am to 5:00pm
 Friday 8:30am to 6:00pm
 Saturday 8:30am to 12:00pm

Branch Geography:

Clinton County Census Tracts

9643.00, 9644.00, 9645.01, 9645.02, 9646.00, 9647.00, 9648.00, 9649.00, 9650.00 and 9651.00

The Wilmington Savings Bank has been a part of the Wilmington community for over 125 years, 138 years to be exact. The Wilmington Homestead Company was incorporated in May 1886, and Union Loan and Savings Company, incorporated in January of 1890. Both institutions joined hands, becoming The Wilmington Savings Association on July 1, 1971 at 31 S. South Street. On June 27, 1977, WSB opened its new and current office at 184 N. South Street and on December 30, 1992, became The Wilmington Savings Bank.

Hillsboro Office

137 N. High Street
 Hillsboro, OH 45133
 Phone: 937-366-1421
 Toll Free: 800-951-9958
 www.wilmingtonsavings.com

Hours of Operation:

Monday-Friday 9:00am to 1:00pm
 Saturday Closed

Branch Geography:

Highland County Census Tracts

9544.00, 9545.00, 9546.00, 9547.00, 9548.00, 9549.00, 9550.01, 9550.02, 9551.01, 9551.02 and 9552.00

The Wilmington Savings Bank opened its branch office in downtown Hillsboro, Ohio on October 11, 2017 to better meet the needs of its Highland County customers.

Branches Opened and Closed History

	2024	2023	2022	2021	2020	2019	2018	2017	2016
Branches Opened	0	0	0	0	0	0	1	0	0
Branches Closed	0	0	0	0	0	0	0	0	0
Mergers / # of Branches	0	0	0	0	0	0	0	0	0

List of Products and Services

December 31, 2023 and December 31, 2024

Deposit Products:

- ✓ Checking Accounts
- ✓ Money Market Accounts
- ✓ Savings Accounts
- ✓ Certificates of Deposit
- ✓ Individual Retirement Accounts (*IRAs*)
- ✓ Health Savings Accounts

Online Services:

- ✓ Internet Banking
- ✓ Mobile Banking
- ✓ Online Bill Payment
- ✓ Mobile Deposit
- ✓ Telephone Banking
- ✓ eStatements

Account Services:

- ✓ MasterMoney Debit Card
- ✓ ATM Service (*Wilmington Office only*)
- ✓ Allpoint ATM Network (*surcharge free transactions at participating Allpoint ATMs*)
- ✓ Credit Cards
- ✓ Zelle®
- ✓ Safe Deposit Boxes (*Wilmington Office only*)
- ✓ Wire Transfers

Loan Products:

Personal Lending:

- ✓ Auto Loans
- ✓ Share Loans
- ✓ Home Equity Lines of Credit
- ✓ Mortgage Loans
- ✓ Construction Loans

Commercial Lending:

- ✓ Commercial Real Estate
- ✓ Commercial Construction
- ✓ Agricultural
- ✓ Operating Lines of Credit
- ✓ Commercial Vehicle & Equipment

Fee Schedule

December 31, 2023 and December 31, 2024

Miscellaneous Service Fees:

Cashier's Check	\$ 5.00
Wire Transfers	
Incoming Wire	\$ 10.00
Outgoing Wire	\$ 20.00
Interim Statements	\$ 4.00/per statement
Notary Service	
Customer	No Charge
Non-Customer	\$ 2.00
Night Depository	
First Key	Free
Additional Key	\$ 5.00
Zippered Bags	No Charge
Locked Bags	\$ 25.00
Online Banking	No Charge
Online Bill Payment	No Charge
Telephone Banking	No Charge
Mobile Deposit	No Charge
Garnishment/Levy	\$ 80.00
Debit Card Replacement Fee	\$ 10.00
Excessive Transaction Fee	\$ 10.00
Dormancy Fee	\$ 5.00/Month
Closed Account Fee	
<i>(within first 180 days)</i>	\$ 25.00
Account Research	
<i>(1 hour minimum)</i>	\$ 25.00/per hour
Account Balancing	
<i>(1 hour minimum)</i>	\$ 25.00/per hour
On-Us Check Cashing	
Non-Customer	\$ 10.00/per check
Stop Payment	
Check	\$ 35.00
ACH	\$ 35.00
Non-Sufficient Funds (NSF)	\$ 35.00
Deposited Item Returned	\$ 10.00
Canadian Check Processing Fee	\$ 20.00/per check

Safe Deposit Box Fees:

(available at our Wilmington office only)

(Rental requires a Checking, Savings or Premier Savings account)

3 X 5	\$ 20.00*
5 X 5	\$ 25.00*
3 X 10	\$ 30.00*
5 X 10	\$ 40.00*
10 X 10	\$ 65.00*

**Plus, Applicable Taxes*

Replacement Key	\$ 25.00
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Assessment Area

January 1, 2020 to Present

Description:

Changes due to 2020 Census Tract Maps effective 01/01/2020.

Wilmington Savings Banks' Assessment Area includes ten (10) census tracts in Clinton County, Ohio and eleven (11) census tracts in Highland County, Ohio.

Census Tracts and office locations are as follows:

Clinton County

9643.00, 9644.00, 9645.01, 9645.02, 9646.00, 9647.00, 9648.00, 9649.00, 9650.00 and 9651.00

Office(s):

Wilmington, Ohio (*ATM; non-deposit taking*)

Highland County

9544.00, 9545.00, 9546.00, 9547.00, 9548.00, 9549.00, 9550.01, 9550.02, 9551.01, 9551.02 and 9552.00

Offices:

Hillsboro, Ohio (*no ATM*)

Wilmington Savings Bank is a member of the Allpoint ATM Network with the following ATMs available in the Hillsboro area, and at over 55,000 conveniently-located ATMs.

Speedway

1459 N. High St.
Hillsboro, OH 45133

Speedway

247 W. Main St.
Hillsboro, OH 45133

1st Stop

159 W. Main St.
Hillsboro, OH 45133

United Dairy Farmers

233 N. High St.
Hillsboro, OH 45133

Kroger

575 Harry Sauner Rd.
Hillsboro, OH 45133

Walgreens

1090 Northview Dr.
Hillsboro, OH 45133

CVS

1400 N High St.
Hillsboro, OH 45133

Wilmington Savings Bank

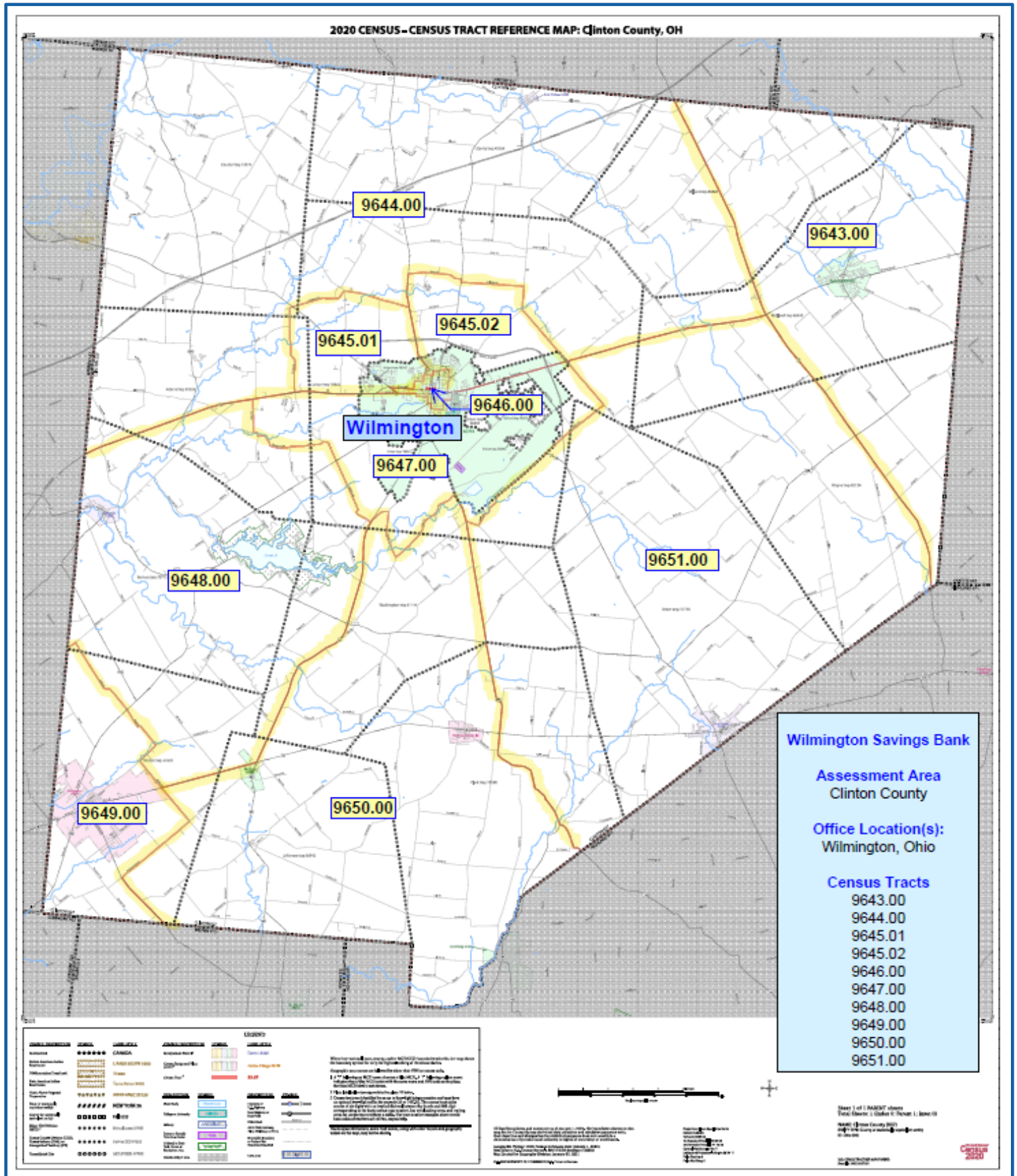
Board Approved CRA Assessment Area



* Denotes branch locations

Wilmington Savings Bank

CRA Assessment Area
Clinton County, Ohio



Loan-to Deposit Ratio

Wilmington Savings Bank's Loan-to Deposit Ratios for quarters ending from March 31, 2020 Through December 31, 2024.

Date	Loans	Deposits		Ratios
March 31, 2020	\$125,691	\$137,613		91.337%
June 30, 2020	\$128,604	\$137,665		93.418%
September 30, 2020	\$137,871	\$133,548		103.237%
December 31, 2020	\$133,490	\$138,218		96.579%
March 31, 2021	\$129,722	\$137,290		94.488%
June 30, 2021	\$133,993	\$147,125		91.074%
September 30, 2021	\$132,505	\$135,762		97.601%
December 31, 2021	\$133,295	\$143,740		92.733%
March 31, 2022	\$144,025	\$149,497		96.340%
June 30, 2022	\$157,358	\$153,436		102.556%
September 30, 2022	\$170,058	\$153,951		110.462%
December 31, 2022	\$176,777	\$158,394		111.606%
March 31, 2023	\$177,624	\$161,641		109.888%
June 30, 2023	\$180,984	\$158,056		114.506%
September 30, 2023	\$180,368	\$158,070		114.106%
December 31, 2023	\$180,960	\$156,107		115.920%
March 31, 2024	\$182,953	\$151,860		120.475%
June 30, 2024	\$184,298	\$206,728		89.150%
September 30, 2024	\$184,305	\$204,323		90.203%
December 31, 2024	\$182,455	\$208,114		87.671%