PUBLIC DISCLOSURE

January 6, 2014

COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION

The Richwood Banking Company, Inc.
RSSD # 150727

28 North Franklin Street
Richwood, Ohio 43344

Federal Reserve Bank of Cleveland

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

TABLE OF CONTENTS

INSTITUTION'S CRA RATING: This institution is rated "Satisfactory"
The Lending Test is rated: "Satisfactory"
The Community Development Test is rated: "Satisfactory"

The major factors and criteria contributing to this rating include:

- A reasonable loan-to-deposit ratio, given the bank's size, financial condition, and assessment area credit needs;

- A majority of loans and other lending related activities in the assessment area;

- The geographic distribution of loans reflects a reasonable penetration among individuals of different income levels (including low- and moderate- income);

- The distribution of loans to borrowers reflects a reasonable penetration among businesses of different sizes given the demographics of the assessment area; and

- The distribution of loans to businesses reflects a reasonable penetration among businesses of different sizes given the demographics of the assessment area; and,

- There were no CRA-related complaints filed against the bank since the previous CRA examination.

- The bank's community development performance demonstrates an adequate responsiveness to the community development needs of its assessment area, considering the bank's capacity and the need and availability of such opportunities in the bank's assessment area.

The bank was evaluated as a small bank and was rated "Satisfactory" at the previous CRA evaluation conducted October 19, 2009.
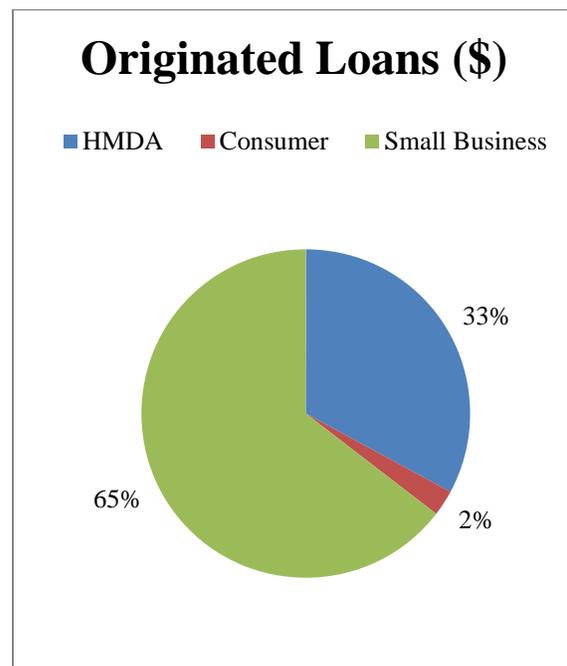
SCOPE OF EXAMINATION

The Richwood Banking Company (Richwood) Community Reinvestment Act (CRA) public evaluation is based on loans originated from January 1, 2012 to August 1, 2013. The bank's lending activity for this period was evaluated using the interagency intermediate small bank examination procedures.

The loan products reviewed included loans reported under the Home Mortgage Disclosure Act (HMDA), consumer loans and small business loans. HMDA loans are comprised of home purchase and refinance loans and consumer loans are comprised of motor vehicle, other secured and unsecured consumer loans.

Community development activities for the period of October 20, 2009 through December 9, 2013 were also reviewed as part of this evaluation, specifically community development loans, investments and services occurring since the previous examination.

The following table and charts illustrate the volume and distribution of loans originated within Richwood's assessment area during the evaluation period:

Loan Type	Number of Loans	Dollar Amount of Loans (000s)
HMDA	359	52,523
Consumer	385	4,046
Small Business	673	103,056
Total	**1,417**	**159,625**

Originated Loans (#)

HMDA ■ Consumer ■ Small Business

HMDA 25%
Consumer 27%
Small Business 48%

Originated Loans ($)

HMDA ■ Consumer ■ Small Business

HMDA 33%
Consumer 2%
Small Business 65%
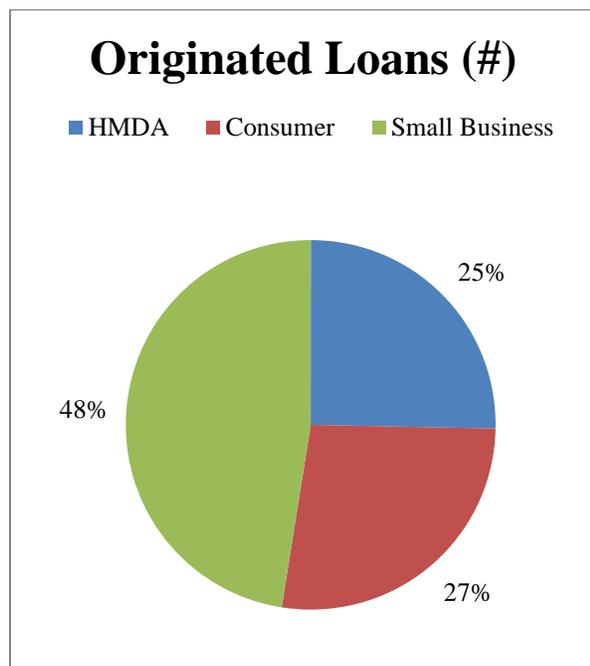
Based on the loan volume by dollar amount and the bank's stated business strategy, small business lending received the greatest weight in the analysis, followed by HMDA and consumer lending. The Columbus MSA received greater weight than the non-metropolitan assessment area because a majority of the loans were made in the MSA and most of the offices are located in this area.

Richwood's assessment area for CRA purposes is comprised of the following two assessment areas and the scope of the review for each area was determined based on the volume of lending activity and deposit share:

- Columbus, OH Metropolitan Statistical Area - full scope evaluation
- Non-Metropolitan Area - limited scope evaluation

A detailed description of each assessment area is presented in subsequent sections of this performance evaluation.

For the purpose of this evaluation, borrower distribution received somewhat greater weight than geographic distribution, as there were a greater percentage of low- and moderate-income individuals in the assessment area compared to the percentage of low- and moderate-income tracts. Additionally, there are no low-income tracts in either the MSA or non-metropolitan assessment areas.

In some cases, information for originated loans could not be provided by the bank. Therefore, the loan volumes used for borrower distribution are based on a sample of originated loans and are lower than the number of originated loans listed above.

DESCRIPTION OF INSTITUTION

Richwood is the banking subsidiary of Richwood Bancshares. Both the bank and the holding company are located in Richwood, Ohio.

According to the September 30, 2013 Uniform Bank Performance Report (UPBR), Richwood had total assets of $407.9 million, a 68.7% increase in total assets since the previous evaluation in October 2009.

Richwood has one main office and five branch offices. The bank's main office is located in Union County (Richwood) in a middle-income tract. The bank has two additional offices located in Union County (Plain City and Marysville), which are in upper- and middle-income tracts. Richwood also has one branch located in Marion County (Larue), Logan County (Huntsville), and Delaware County (Delaware), which are all located in middle-income tracts. All of Richwood's branches have full-service automated teller machines (ATMs).

Richwood closed all additional ATM locations, which were cash-dispensing only, since the prior evaluation and opened one branch in the fall of 2010, located at 1512 W. William Street, Delaware, Ohio.

Richwood is a full-service retail bank offering business and consumer deposit accounts and commercial, residential mortgage and consumer loans. The following charts display the bank's loan portfolio composition and trend as of September 30, 2013.

COMPOSITION OF LOAN PORTFOLIO						
	9/30/2013		12/31/2012		12/31/2011	
Loan Type	$ (000s)	Percent	$ (000s)	Percent	$ (000s)	Percent
Construction and Development	21,870	10.8%	16,777	9.5%	18,395	11.5%
Secured by One- to Four- Family Dwellings	57,086	28.1%	50,789	28.6%	49,380	31.0%
Other Real Estate: Farmland	41,301	20.3%	33,000	18.6%	26,523	16.6%
Other Real Estate: Multifamily	1,391	0.7%	1,453	0.8%	1,654	1.0%
Other Real Estate: Nonfarm nonresidential	41,659	20.5%	37,067	20.9%	31,538	19.8%
Commercial and Industrial	17,611	8.7%	18,670	10.5%	14,709	9.2%
Loans to Individuals	3,547	1.7%	3,474	2.0%	3,273	2.1%
Agricultural Loans	18,626	9.2%	16,142	9.1%	13,921	8.7%
Total	$203,091	100.00%	$177,372	100.00%	$159,393	100.00%

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

Loan Portfolio Trend
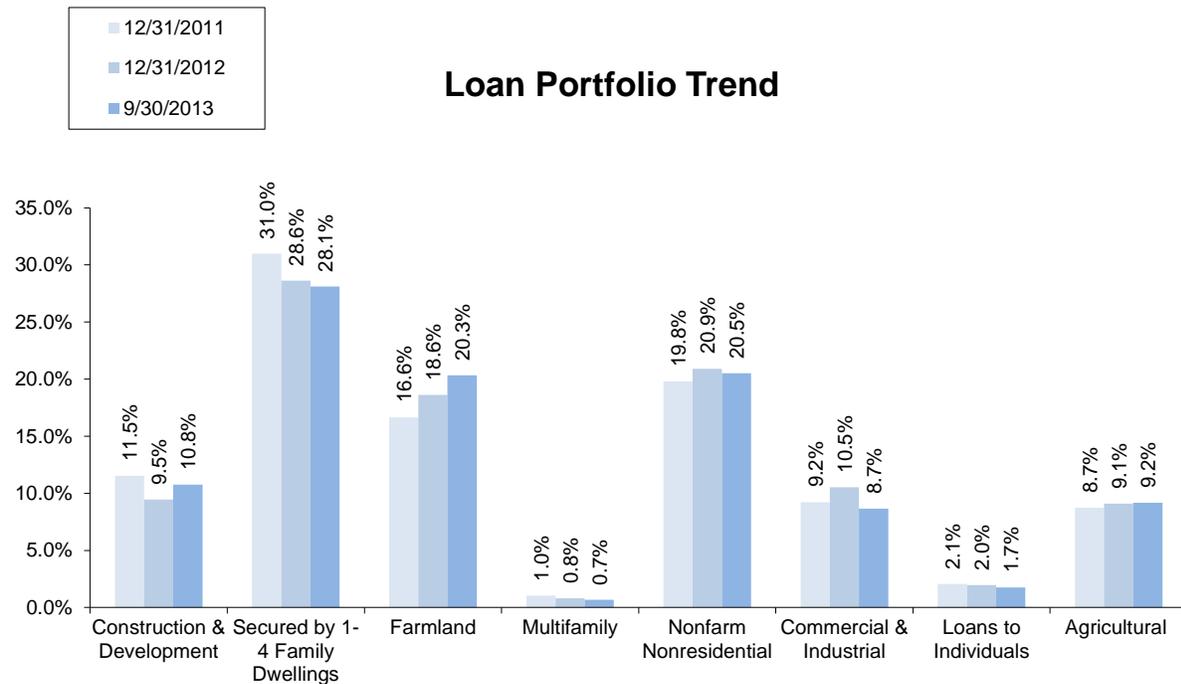
Richwood's investment portfolio as of September 30, 2013 was $170 million, which represents 41.8% of total assets. Investments in U.S. Treasuries and Agency Securities account for 61.5% of investments, and municipal securities account for 35.5% of investments, while interest-bearing bank balances, federal funds sold, and other investments comprise the remaining 3.0% of the bank's total investments.

There are no legal or financial constraints preventing Richwood from meeting the credit needs of its assessment area in a manner consistent with its asset size, business strategy, resources and local economy.

DESCRIPTION OF ASSESSMENT AREAS

Richwood has two assessment areas within Ohio. The first, Non-Metropolitan Ohio, consists of the entirety of Logan County, the south and western portions of Marion County, and the north-central and northeast portions of Champaign County. The Columbus, Ohio Metropolitan Statistical Area 18140 is comprised of the entirety of Union County, the majority of Delaware County, and the northern half of Madison County.

The bank's total assessment areas consists of 51 census tracts, of which four (7.8%) are designated as moderate-income, 26 (51.0%) are middle-income and 21 (41.2%) are upper-income tracts.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Lending Test

Richwood's overall performance under the lending test is considered satisfactory. The loan-to-deposit ratio is reasonable and the bank made a majority of loans in its assessment area. Both the geographic and borrower distribution is reasonable overall and is reasonable for each assessment area.

Loan-to-Deposit Ratio

A financial institutions loan-to-deposit ratio (LTD) compares the institutions aggregate loan balances outstanding to its total deposits outstanding. The ratio is a measure of an institutions lending volume relative to its capacity to lend and is derived by adding the quarterly LTD ratios and dividing by the total number of quarters. The table below illustrates Richwood's LTD ratio compared to both the bank's aggregate peer group, consisting of all insured commercial banks having assets between $300 million and $1 billion, and two local peer banks.

Richwood Banking Company Loan-to-Deposit Ratios					
As of Date	Bank Ratio	Aggregate Ratio	PERPETUAL FSB	DELAWARE CTY B&TC	CUSTOM PEER
September 30, 2013	54.4	75.1	100.8	77.8	89.3
June 30, 2013	51.7	74.9	98.2	75.8	87.0
March 31, 2013	49.5	73.2	99.2	71.9	85.5
December 31, 2012	52.3	74.0	100.2	67.3	83.7
September 30, 2012	47.3	74.5	101.5	71.3	86.4
June 30, 2012	48.1	74.1	105.4	69.1	87.2
March 31, 2012	46.7	73.1	102.8	71.2	87.0
December 31, 2011	50.9	75.1	0.00	78.5	78.5
September 30, 2011	46.6	75.9	0.00	81.8	81.8
June 30, 2011	46.5	76.6	0.00	81.2	81.2
March 31, 2011	44.8	76.5	0.00	81.8	81.8
December 31, 2010	48.5	78.9	0.00	89.2	89.2
September 30, 2010	45.1	79.7	0.00	86.2	86.2
June 30, 2010	46.4	80.4	0.00	85.0	85.0
March 31, 2010	48.4	80.9	0.00	82.1	82.1
December 31, 2009	51.2	81.1	0.00	86.2	86.2
September 30. 2009	50.4	82.6	0.00	82.3	82.3
Quarterly Loan-to-Deposit Ratio Average Since the Previous Evaluation	**48.8**	**76.9**	**101.2**	**78.7**	**84.7**

Richwood's average LTD ratio was 48.8% since the previous evaluation, which is below the aggregate average ratio of 76.9% and custom peer average ratio of 84.7%. Over the prior 17 quarters, Richwood's LTD ratio has decreased from a high of 54.4% as of September 30, 2013 to a low of 44.8% as of March 31, 2011. The LTD ratio has shown steady increase beginning in March 2013. When discussing the LTD ratio with bank management, a major driver for the relatively low ratio is the fact that the bank is a strong public funds depository with an emphasis on counties and school districts. Public fund deposits impact a bank's ability to lend, as those funds must have securities pledged, which reduces funds available for lending.

Additionally, Richwood's LTD ratio was compared to the following local peer banks: Perpetual FSB, Urbana, Ohio (Champaign County) and Delaware County Bank & Trust Company, Delaware, Ohio (Delaware County). The Delaware County B&TC has 16 offices with a 8.7% market share, while the Perpetual Federal Savings Bank has one office with a market share of 5.6%.

Considering the bank's lending and deposit related activity, size, financial condition and assessment area credit needs, Richwood's LTD ratio is considered reasonable.

Lending in the Assessment Area

Small business, HMDA and consumer lending was analyzed to determine the volume of lending inside and outside the bank's assessment area. Of the total loans, 87.6% by volume and 83.5% by dollar amount were made inside the assessment area.

The following table shows the distribution of loans made inside and outside the bank's assessment area.

Lending Inside and Outside the Assessment Area											
Exam: Richwood Test											
Loan Type - Description	**Inside**				**Outside**				**Total**			
	#	**%**	**$(000s)**	**%**	**#**	**%**	**$(000s)**	**%**	**#**	**%**	**$(000s)**	**%**
MV - Motor Vehicle	159	90.3	1,589	92.3	17	9.7	132	7.7	176	100.0	1,721	100.0
XX - Consumer Loans	188	90.0	2,162	93.0	21	10.0	163	7.0	209	100.0	2,325	100.0
Total Consumer related	**347**	**90.1**	**3,751**	**92.7**	**38**	**9.9**	**295**	**7.3**	**385**	**100.0**	**4,046**	**100.0**
CV - Home Purchase - Conventional	101	77.1	11,667	73.8	30	22.9	4,150	26.2	131	100.0	15,817	100.0
HI - Home Improvement	31	86.1	2,765	92.1	5	13.9	237	7.9	36	100.0	3,002	100.0
MF - Multi-Family Housing	1	50.0	220	13.6	1	50.0	1,400	86.4	2	100.0	1,620	100.0
RF - Refinancing	164	86.3	25,603	79.8	26	13.7	6,481	20.2	190	100.0	32,084	100.0
Total HMDA related	**297**	**82.7**	**40,255**	**76.6**	**62**	**17.3**	**12,268**	**23.4**	**359**	**100.0**	**52,523**	**100.0**
SB - Small Business	597	88.7	89,352	86.7	76	11.3	13,704	13.3	673	100.0	103,056	100.0
Total Small Bus. related	**597**	**88.7**	**89,352**	**86.7**	**76**	**11.3**	**13,704**	**13.3**	**673**	**100.0**	**103,056**	**100.0**
TOTAL LOANS	**1,241**	**87.6**	**133,358**	**83.5**	**176**	**12.4**	**26,266**	**16.5**	**1,417**	**100.0**	**159,624**	**100.0**

A majority of the bank's loans by both volume and dollar amount were made inside its assessment area.

Geographic Distribution of Lending

Richwood's geographic distribution of lending is reasonable. The bank did not have any significant lending gaps in its primary assessment area and the dispersion of loans among different tract income categories is adequate. Small business lending, which received the greatest weight is considered adequate; however, HMDA lending is excellent. Consumer lending, which received the least weight, is adequate. The respective analysis is included within each assessment area evaluation later in this report.

Borrower Distribution of Lending

Richwood's lending to borrowers of different income categories and lending to businesses of different revenue sizes is considered reasonable. Small business lending, which received the greatest weight, is good. HMDA lending and consumer lending are both excellent. The respective analysis can be found within subsequent sections of this report.

Response to Consumer Complaints

The bank has not received any CRA-related complaints since the previous examination.

Community Development Test

Richwood's performance under the community development test is considered satisfactory. The bank's performance demonstrates an adequate responsiveness to the needs of its assessment area through community development loans, qualified investments, and services, considering the bank's capacity and the need and availability of opportunities in the bank's assessment area.

All of Richwood's community development activities were conducted in the Columbus MSA assessment area. Refer to the performance test conclusions for this assessment area later in the report for details about the bank's community development loans, services and investments.

Fair Lending or Other Illegal Credit Practices Review

No evidence of discrimination or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN
COLUMBUS METROPOLITAN STATISTICAL AREA 18140
(Full-scope Review)

Richwood's metropolitan assessment area encompasses the entirety of Union County and the majority of Delaware and the northern half of Madison Counties, which are part of the Columbus Metropolitan Statistical Area (MSA) in central Ohio. This assessment area consists of a total of 35 census tracts, of which two are moderate-income census tracts (5.7%), 17 middle-income tracts (48.6%) and 16 upper-income tracts (45.7%). Richwood operates four offices in this assessment area: two in Union County, one of which includes the main office; one office in Madison County; and one office in Delaware County.

Union County is located in eastern-central Ohio and is a mixture of cropland and forest areas. Marysville is the largest city and county seat. The county had a population of 52,300, according to the 2010 U.S. Census.

Delaware County is located east of Union County. Delaware City is the largest city and county seat and is located approximately 125 miles southwest of Cleveland. The county had a population of 174,214, according to the 2010 U. S. Census.

Madison County is situated south of Union County. The city of London is the largest city and the county seat. The county had a population of 43,435, according to the 2010 U.S. Census.

According to the September 30, 2013 FDIC Deposit Market Share Report,[1] Richwood ranked fifth out of 21 institutions in the market with a deposit share of 10.1%. The largest institutions by deposit share are larger regional financial institutions: JPMorgan Chase Bank, National Association (24.6%); The Delaware County Bank and Trust Company (14.3%); PNC Bank, National Association (13.6%); and The Huntington National Bank (13.0%).

#	Financial Institution	Deposit Market Share
1	JP Morgan Chase Bank, National Association	24.6%
2	The Delaware County Bank and Trust Company	14.3%
3	PNC Bank, National Association	13.6%
4	The Huntington National Bank	13.0%
5	The Richwood Banking Company	10.1%
6	Fifth Third Bank	7.5%
7	Firstmerit Bank, National Association	3.3%
8	Fidelity Federal Savings and Loan Association of Delaware	3.0%
9	KeyBank National Association	2.8%
10	Advantage Bank	2.1%

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1 FDIC Summary of Deposits, www.fdic.gov

One community contact interview was conducted in conjunction with this examination. The community contact provided context to the demographic and economic characteristics of the assessment area. The interview was with a community development organization that supports the housing needs of residents within the assessment area.

Population Characteristics

According to the 2010 U.S. Census, the total population in this market is 166,401. Approximately, 5.1% of the assessment area's population resides in moderate-income tracts and 43.5% in middle-income tracts, while 51.4% reside in upper-income tracts. As shown in the chart below, 72.3% of the population is 18 years of age or older, which is the legal age to enter into a contract, while 62.2% of the population is between the ages of 18 and 64 and more likely to have credit needs.

Population by Age (%)

27.6	17 & Younger
7.4	18-24
54.8	25-64
10.1	65 & Older
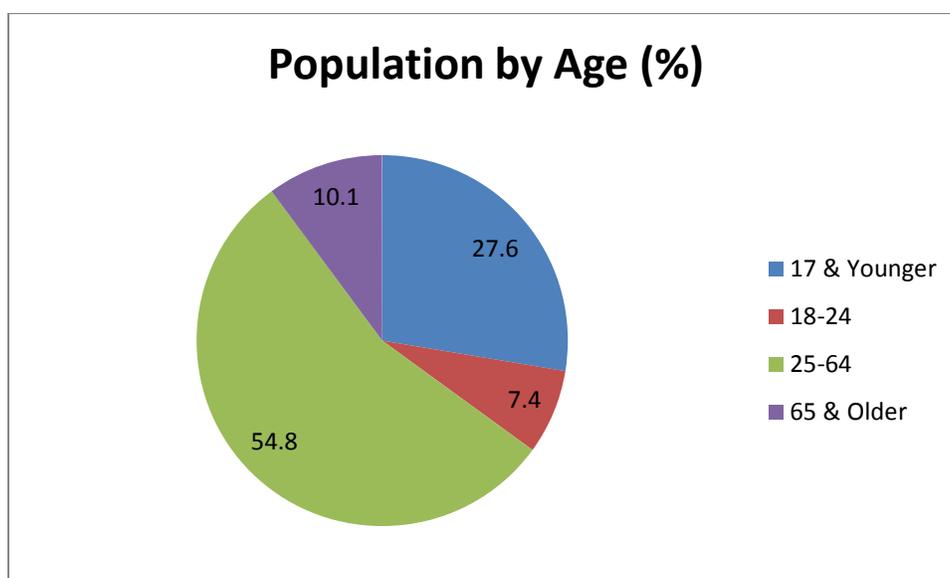
The population in the Columbus MSA is increasing, as depicted in the following table, which shows the actual and projected population changes over the 2010 U.S. Census figure by county in this assessment area.[2]

County	2010 Population	2012 Population (estimate)	Population Percent Change
Delaware	174,214	181,061	3.9%
Madison	43,435	43,053	-0.9%
Union	52,300	52,715	0.8%
Total	**269,949**	**276,829**	

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2 American Fact Finder, http://factfinder2.census.gov

Income Characteristics

According to 2010 U.S. Census Data, the median family income for the assessment area was $81,912 compared to Ohio's median family income of $59,680.   Based on 2012 HUD data, the median family income increased to $67,900, from $67,500 in 2011.[3]

The assessment area contains 58,612 households, of which 43,991 were designated as families. Low- and moderate-income families represent 13.6% and 13.5% of all families in this assessment area, respectively, with 4.9% of families below the poverty level as compared to 10.3% of all families below the poverty level within Ohio. According to the 2011 data from the Economic Research Service of the United States Department of Agriculture (USDA),[4] all the counties within the assessment were below the State of Ohio (16.4%) and national poverty rate (15.9%) as referenced in the chart below.

County	1999 Poverty Rate	2011 Poverty Rate	Change
Delaware	3.80%	4.50%	18.42%
Madison	7.80%	10.50%	34.62%
Union	4.60%	6.60%	43.48%
Ohio	**10.60%**	**16.40%**	**54.72%**
United States	**12.40%**	**15.90%**	**28.23%**

Labor, Employment and Economic Characteristics

According to the Ohio Office of Policy, Research and Strategic Planning, the largest industries by average employment are professional and business services (Delaware County); trade, transportation, and utilities (Madison County); and manufacturing (Union County), as depicted in the chart below.[5]

County	Primary Employment Sectors	Major Employers
Delaware	Professional and Business Services, Trade, Transportation and Utilities, Leisure and Hospitality, Local Government, Education and Health Services, Financial Services, Manufacturing and Construction	Delaware City Schools, Emerson/Liebert, JP Morgan Chase & Co, Kroger Co, McGraw Hill Companies, Mettler-Toledo International, Ohio Wesleyan University, Ohio Health/Grady Memorial Hospital, Olentangy Local Schools, PPG Industries Inc, Showa Corp/American Showa and State of Ohio
Madison	Trade, Transportation and Utilities, Manufacturing, Local Government, Education and Health Services, State Government, Professional and Business Services, Leisure and Hospitality and Construction	Battelle Memorial Institute, Keihin Thermal Technology, Kikuchi Metal et al/Jefferson Industries, London City Schools, Madison County Hospital, Nissen Chemitec, Restoration Hardware, Stanley Electric US Co Inc, Staples Inc, State of Ohio and Target Corp
Union	Manufacturing, Professional and Business Services, Trade, Transportation and Utilities, Local Government, Leisure and Hospitality, Education and Health Services, Construction and State Government	Honda Motor Co Ltd, Marysville Exempted Village Schools, Memorial Hospital of Union County, Nestle R & D, Parker Hannifin Corp, Scotts Miracle-Gro Co, State of Ohio, Union County Government and Veyance Technologies Inc

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3 Department of Housing and Urban Development: www.huduser.org/portal/datasets/it.html

4 U.S. Department of Agriculture: www.ers.usda.gov/data/povertyrates

5 Ohio County Profiles, Ohio Office of Policy, Research and Strategic Planning:
http://development.ohio.gov/reports/reports_countytrends_map.html

The following table shows the 2012 and 2013 average annual unemployment rate for counties in the assessment area and reflects a decreasing trend over the two-year period.

Unemployment Rates

Assessment Area: OH, Columbus MSA

Area	Years - Annualized	
	2012	**2013**
Delaware Co.	5.0 (E)	5.2 (P)
Madison Co.	6.6 (E)	6.4 (P)
Union Co.	5.5 (E)	5.2 (P)
Columbus MSA	6.1 (E)	6.1 (P)
Ohio	**7.2 (D)**	**7.1 (P)**

Not Seasonally Adjusted

D : Reflects revised population controls and model reestimation.

E : Reflects revised inputs, reestimation, and controlling to new statewide totals.

P: Preliminary as of November 2013.

The following table illustrates the largest percentage of land use in each county in the assessment area:

County	Urban	Cropland	Pasture	Forest	Open Water	Bare Mines	Wetlands
Delaware	16.7%	52.6%	2.6%	25.8%	2.1%	0.3%	0.0%
Madison	5.7%	81.1%	6.8%	5.2%	0.5%	0.0%	0.7%
Union	5.3%	69.3%	4.3%	18.9%	0.5%	0.1%	1.6%

Only 5.3% of the land in Union County is considered urban, which includes land used for residential, commercial, industrial, or transportation purposes or as urban grasses.   The remaining amount of land that does not contain housing, businesses and schools may impact Richwood's ability to originate all types of loans in this assessment area.

Housing Characteristics

There are 62,179 housing units in this assessment area, based on the 2010 U.S. Census. Within this assessment area, 74.6% of the units are owner-occupied, 19.7% were rental units and 5.7% were vacant.   From an income perspective, only 3.4% of all owner occupied housing units were located in moderate-income tracts, suggesting limited opportunity for mortgage credit in these geographies. Furthermore, the owner occupancy rate in the moderate-income tracts was 39.9%. Union County's owner occupancy rate was above Ohio's rate of 61.7%.

The median age of housing stock is 25, according to the 2010 U.S. Census, with 18.7% of the housing units built prior to 1950. The age of the housing stock was notably younger than the statewide median age of 44 years and indicates that there is not much opportunity for home improvement lending.

The median housing value in the assessment area is $198,954, with an affordability ratio of 35.2%. The higher the affordability ratio, the more affordable a home is considered. The housing affordability ratio is calculated by dividing median family income by the median housing value. The housing stock in the assessment area is slightly more affordable than Ohio's (34.7%). Further, based on the 2010 median family income for the MSA, ($67,900), approximately 15.1% of the homes valued up to $110,675 in the assessment area would be considered affordable for low-income individuals and 47.6% of the homes valued up to $177,079 would be considered affordable for moderate-income individuals. These percentages were calculated assuming a housing expense ratio equal to 28.0% of gross income for a 5.0% fixed-rate, 30-year loan.

One in every 949 (0.1%) properties in Union County was in foreclosure in November 2013, while one in 973 was in foreclosure in Delaware County and one in 982 in Madison County. This was lower than Ohio's ratio of one in every 757 properties and slightly higher than the national rate of 1 in every 1,155 properties. [6]

According to Sperling's Best Places, the 2012 median home cost in Union County was $91,500, an appreciation of 0.3% over the prior year, while the median home cost in Madison County is $147,900 and $162,600 in Delaware County, with a 0.3% appreciation. [7]

The median gross rent in the assessment area was $738, with 7.0% of the rental units having rents of less than $350 a month, according to the 2010 U.S. Census. The majority of rents (52.8%) were greater than $700 per month. Less than one-quarter of all housing units in the assessment area are rental units. Additionally, 42.4% of renters have rent costs greater than 30.0% of their income.

The following chart illustrates the demographics of the Columbus MSA.

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6 RealtyTrac:http//www.realtytrac.com
7 Sperling's Best Places: http://bestplaces.net

Combined Demographics Report

Assessment Area(s): Columbus, OH MSA 18140

Income Categories	Tract Distribution #	%	Families by Tract Income #	%	Families < Poverty Level as % of Families by Tract #	%	Families by Family Income #	%
Low-income	0	0.0	0	0.0	0	0.0	5,961	13.6
Moderate-income	2	5.7	2,002	4.6	263	13.1	5,943	13.5
Middle-income	17	48.6	18,485	42.0	1,310	7.1	8,851	20.1
Upper-income	16	45.7	23,504	53.4	572	2.4	23,236	52.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**35**	**100.0**	**43,991**	**100.0**	**2,145**	**4.9**	**43,991**	**100.0**

| | Housing Units by Tract | Housing Types by Tract | | | | | | |
		Owner-Occupied #	%	%	Rental #	%	Vacant #	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	3,979	1,587	3.4	39.9	1,940	48.8	452	11.4
Middle-income	28,239	18,998	41.0	67.3	7,326	25.9	1,915	6.8
Upper-income	29,961	25,767	55.6	86.0	2,994	10.0	1,200	4.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	**62,179**	**46,352**	**100.0**	**74.5**	**12,260**	**19.7**	**3,567**	**5.7**

| | Total Businesses by Tract # | % | Businesses by Tract & Revenue Size | | | | | |
			Less Than or = $1 Million #	%	Over $1 Million #	%	Revenue Not Reported #	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	479	5.7	440	5.7	22	5.5	17	5.8
Middle-income	3,439	40.7	3,149	40.6	158	39.6	132	44.7
Upper-income	4,531	53.6	4,166	53.7	219	54.9	146	49.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**8,449**	**100.0**	**7,755**	**100.0**	**399**	**100.0**	**295**	**100.0**
	Percentage of Total Businesses:			**91.8**		**4.7**		**3.5**

| | Total Farms by Tract # | % | Farms by Tract & Revenue Size | | | | | |
			Less Than or = $1 Million #	%	Over $1 Million #	%	Revenue Not Reported #	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	6	0.8	6	0.8	0	0.0	0	0.0
Middle-income	348	47.1	348	47.3	0	0.0	0	0.0
Upper-income	385	52.1	381	51.8	4	100.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**739**	**100.0**	**735**	**100.0**	**4**	**100.0**	**0**	**.0**
	Percentage of Total Farms:			**99.5**		**.5**		**.0**

Based on 2012 D&B information according to 2010 ACS Boundaries.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN
COLUMBUS METROPOLITAN STATISTICAL AREA 18140

Lending Test

Lending performance in the Columbus MSA assessment area is considered to be reasonable. Both the geographic and borrower distribution of lending is reasonable.

The greatest consideration, based on volume, was given to small business, followed by HMDA lending (home purchase and refinance lending), and consumer lending (motor vehicles, other secured and unsecured consumer loans). There were not enough home improvement loans to conduct a meaningful analysis.

Details of the bank's small business, HMDA and consumer lending can be found in the tables in Appendix B.

Geographic Distribution of Lending

Based upon the analysis of the bank's lending, no significant gaps were noted. During the evaluation period, the bank originated loans in the majority of census tracts in the assessment area. Richwood originated loans in all of the census tracts in Union County, where the main office is located. In addition, loans were originated in all of the moderate-income census tracts in the assessment area.

Overall, Richwood's distribution of lending among geographies is considered adequate.

Small Business Lending

Richwood originated 514 small business loans in the assessment area during the review period. As shown in the graph below, the bank's performance of lending was significantly less than the proxy in the moderate-income tracts. However, the bank originated a higher percentage of small business loans to middle-income tracts, and a slightly lower percentage of small business loans in the upper-income tracts. Due to the bank's performance in the moderate-income tracts and the fact that the only 5.7% of the businesses are within the moderate-income tracts, the geographic distribution of small business lending is adequate.

Small Business Lending by Income Tract Level (%)
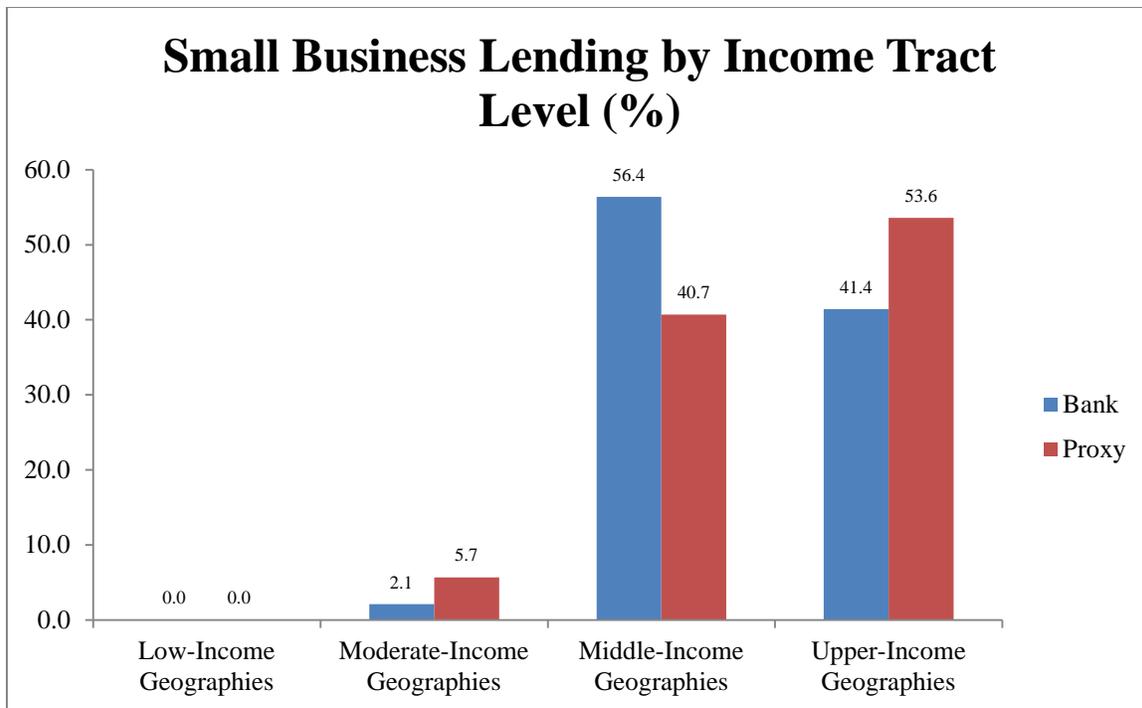
HMDA Lending

The geographic distribution of HMDA-reportable loans was considered excellent. As shown in the graph below, Richwood made 224 HMDA loans comprised of 90 home purchase (40.2%) and 134 refinance loans (59.8%). Richwood's performance was compared to the number of owner-occupied housing units in the assessment area (proxy). Poverty levels, lack of affordability, and general economic conditions in the assessment area, which provide limited lending opportunities, were also considered as part of the evaluation. Richwood made loans in both of the moderate-income tracts.

Home Purchase

The bank performed above the proxy in moderate- and middle-income tracts, while less than the proxy in upper-income tracts, as indicated in the following chart. Richwood's geographic distribution of home purchase loans is considered excellent.

Home Purchase Lending by Tract Income (%)
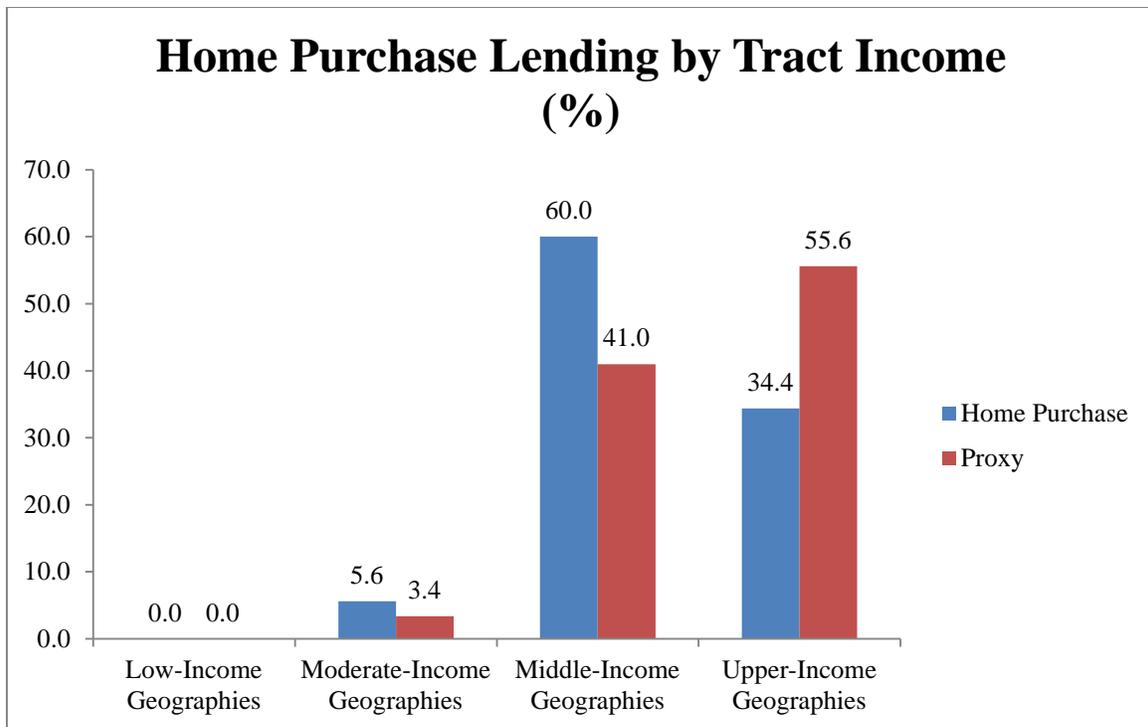
Refinance

Richwood performed above the proxy in moderate- and middle- income tracts, as depicted in the chart below, while slightly less than the proxy in upper-income tracts. Richwood's geographic distribution of refinance loans is considered excellent.

Refinance Lending by Tract Income (%)
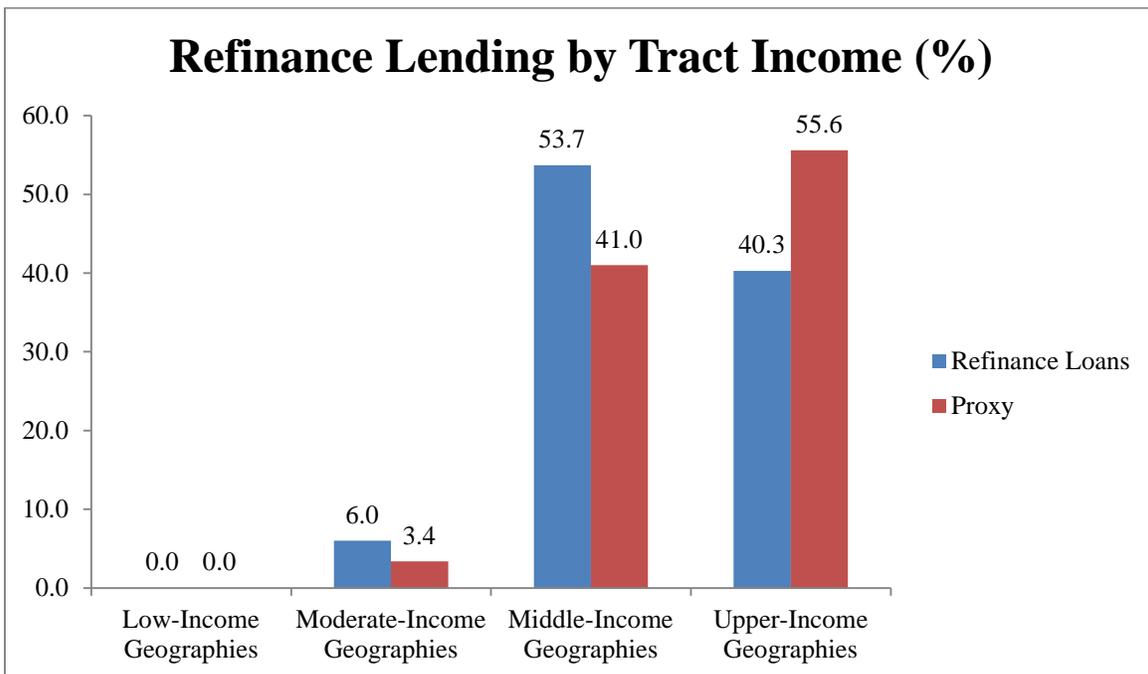
Consumer Lending

Richwood originated 284 consumer loans in the assessment area during the review period. As shown in the chart below, while there were no low-income tracts, the bank's performance was below the number of households (proxy) in the two moderate-income tracts, as well as the upper-income tracts. The bank did outperform the proxy in the middle-income tract. Richwood's geographic distribution for consumer lending is considered adequate.
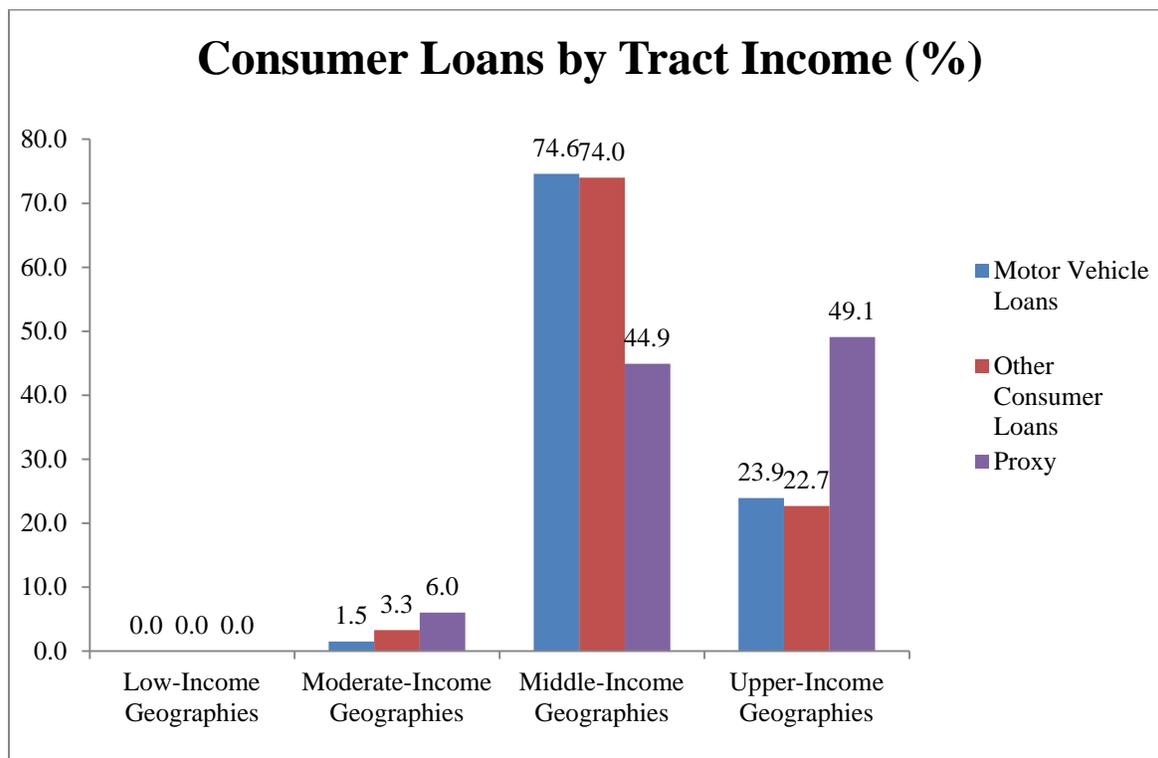
Consumer Loans by Tract Income (%)

Tract Income	Motor Vehicle Loans	Other Consumer Loans	Proxy
Low-Income Geographies	0.0	0.0	0.0
Moderate-Income Geographies	1.5	3.3	6.0
Middle-Income Geographies	74.6	74.0	44.9
Upper-Income Geographies	23.9	22.7	49.1

Borrower Distribution of Lending

Based on lending volume, slightly more weight was given to small business lending when considering borrower distribution in this assessment area. Overall, Richwood's borrower distribution of lending in the Columbus MSA is considered excellent.

Small Business Lending

The borrower distribution for small business loans was comparable to the percentage of small businesses in the assessment area.

As illustrated in the following chart, an analysis of small business lending was conducted to determine the extent of lending to businesses of different revenue sizes, including small businesses. Richwood originated 86.6% of its loans to businesses with revenues of $1 million or less. This is slightly less than the percentage of small businesses in the assessment area at 95.1%. The loan size was also considered, as smaller loans are generally commensurate with the borrowing needs of smaller business. This review showed that 88.2% of small business loans were for loan amounts of $100,000 or less.

Small Business Lending by Revenue Size (%)

Percentage of Loans to Small Business by Loan Size
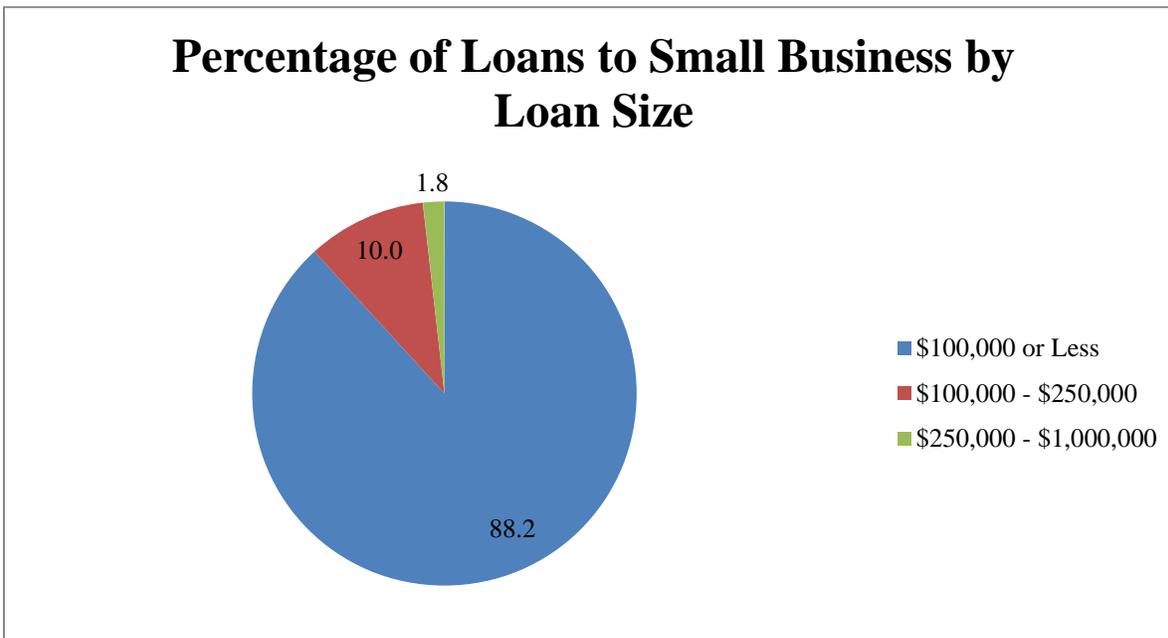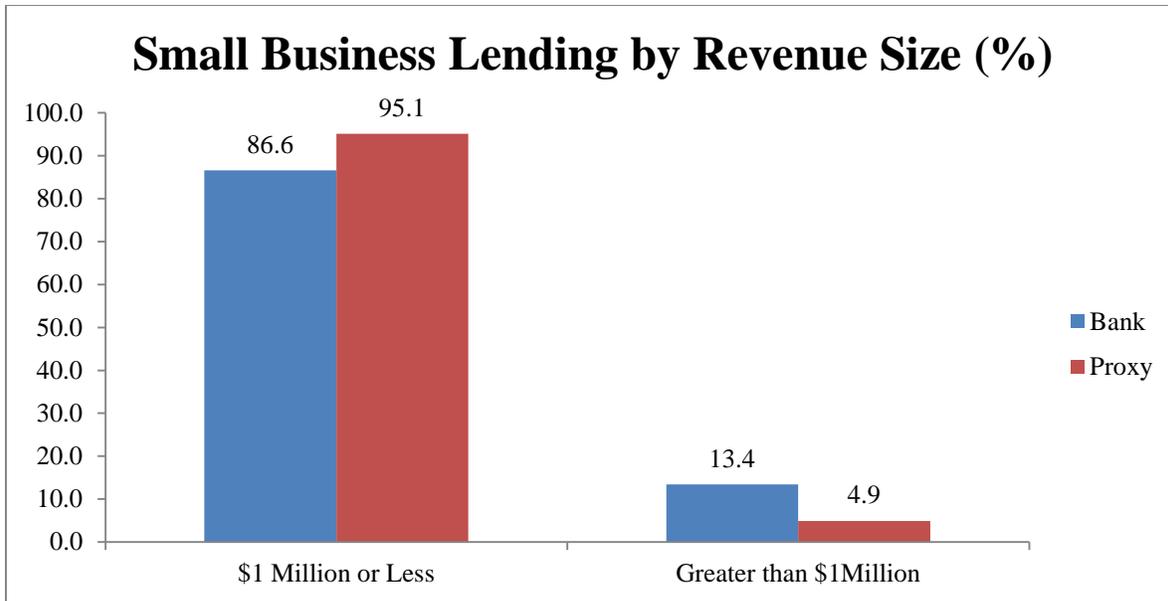
Given the bank's level of lending to borrowers of different income levels and to businesses of various sizes, the borrower distribution of loans made to small businesses is good. Overall, this demonstrates a reasonable responsiveness to meeting the credit needs of small businesses in this area. Refer to the tables in Appendix B for additional information.

HMDA Lending

Richwood's performance was compared to the income levels of families in the assessment area (proxy). Richwood made a total of 216 HMDA loans, of which 85 (39.4%) were home purchase (39.4%) and 131 were refinance (60.6%). The borrower distribution of HMDA lending was considered excellent.

Home Purchase

As depicted in the chart below, Richwood's home purchase lending by family income is comparable to the proxy in the low-income tract and slightly higher than the proxy in the moderate-income tract.

The bank made 13.3% of its HMDA loans to low-income borrowers compared to the percentage of low-income families in the assessment area (proxy) at 13.6%. Also, the bank made 17.8% of its HMDA loans to moderate-income borrowers, which is higher than the percentage of moderate-income families in the assessment area at 13.5%. Middle-income borrowers received 20.0% of the HMDA loans compared to the proxy of 20.1%. Upper-income borrowers received 43.3% of the HMDA loans compared to the proxy of 52.8%. The distribution of home purchase lending is considered to be excellent.
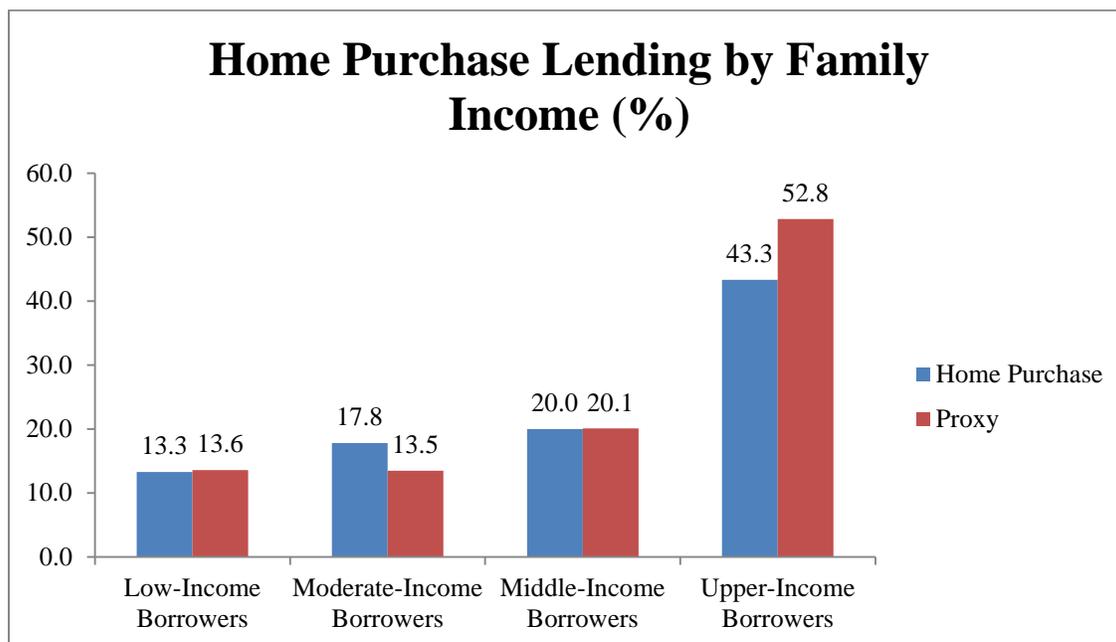
Refinance

Richwood performed slightly lower than the percentage of households to low-income borrowers but slightly higher to borrowers in the moderate- and middle-income households, as depicted in the following chart. Richwood's borrower distribution was below the proxy to upper-income borrowers and is considered excellent overall.

Refinance Lending by Family Income (%)
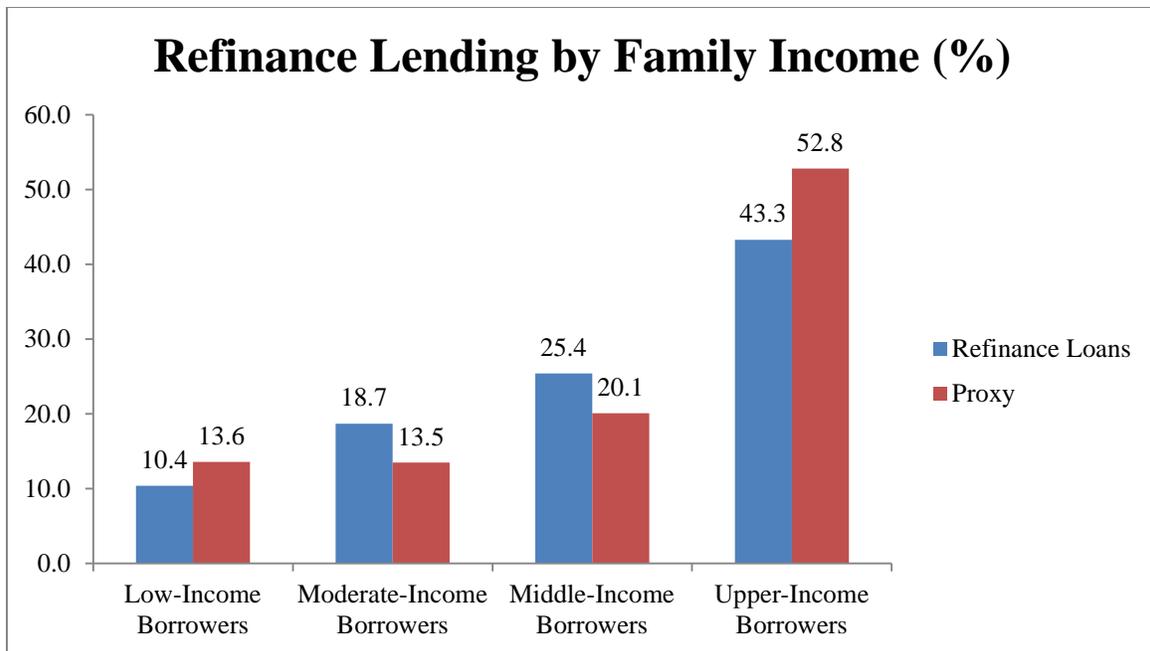
Consumer Lending

Richwood originated 177 consumer loans in the assessment area during the review period. As shown in the chart below, the bank's performance was higher than the number of households (proxy) to low- and moderate- and middle-income borrowers, but significantly lower than the proxy to loans made to upper-income borrowers. Richwood's borrower distribution for consumer lending is considered excellent.

Consumer Loans by Household Income (%)
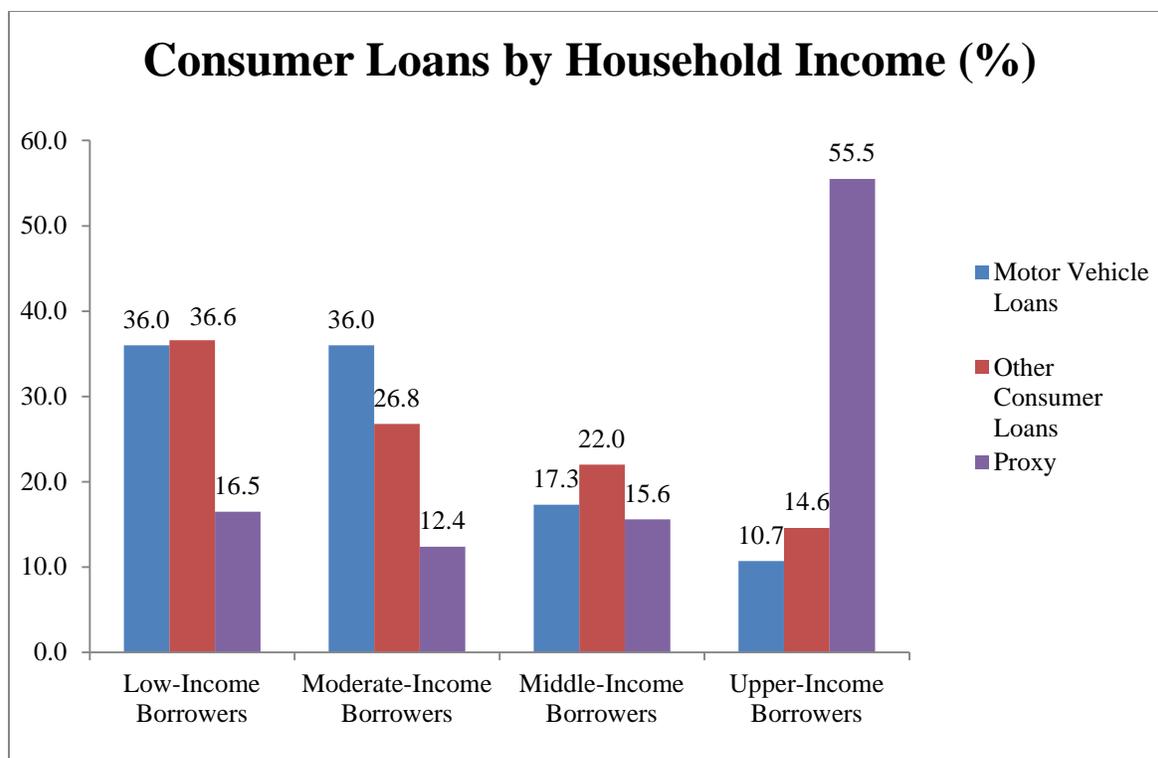
Community Development Test

The bank is rated satisfactory under the Community Development Test. Richwood's community development performance demonstrates an adequate level of responsiveness to the needs of its assessment area through community development lending, investments and services, considering the bank's capacity and the need and availability of such opportunities in the assessment area.

Community Development Loans

Richwood demonstrated good responsiveness to the community development needs of the assessment area through community development loans. The bank originated four community development loans that benefited the assessment area during the evaluation period totaling $500,909 for the stabilization and revitalization of moderate-income neighborhoods and affordable housing and community services to low- and moderate-income individuals. Although included in the lending analysis, Richwood also originated three home purchase loans for affordable housing including one loan to a borrower to acquire a Habitat for Humanity home and two loans to borrowers to acquire three condominiums for rental to HUD income-qualified renters.

Community Development Investments

Richwood has demonstrated an adequate responsiveness to community development investment needs of its assessment area. During the evaluation period, the bank made four new investments to four organizations totaling $14,827. The bank's investments were primarily in the form of donations to support a variety of activities such as affordable housing to low- and moderate-income individuals and community services to low- and moderate-income individuals.

Community Development Services

Richwood has demonstrated an adequate responsiveness to the community development service needs of its assessment area. The bank has created an online program providing financial literacy to low- and moderate-income students.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN
THE NON-METROPOLITAN ASSESSMENT AREA
(Limited-scope Review)

The non-metropolitan assessment area consists of the entirety of Logan County, the south and western portions of Marion County and the north-central and northeast portions of Champaign County. Of the 16 tracts in the assessment area, two are moderate-income (12.5%), nine are middle-income (56.3%) and five are upper-income geographies (31.3%). Richwood operates two offices within this assessment area (one in Logan County and one in Marion County).

According to the FDIC Market Share Report as of September 30, 2013, Richwood's market share was 2.6% and ranked 14th out of 22 institutions. The top three institutions with market share were Perpetual Federal Savings Bank (14.4%), The Huntington National Bank (10.7%), and The Park National Bank (9.6%). Combined, these three institutions represented 34.7% of the deposits, operating 13 offices.

Between January 1, 2012 and August 1, 2013, Richwood originated 15 consumer loans, 22 small business loans, and 39 HMDA loans, representing 5.3% of the bank's total loan volume.

Facts and data reviewed, including performance and demographic information can be found in the core tables accompanying this report.

The table on the following page shows the demographics for this assessment area using data from the 2010 U.S. Census.

Combined Demographics Report

Assessment Area(s): Non Metropolitan Area OH

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	3,447	18.6
Moderate-income	2	12.5	1,987	10.7	440	22.1	2,803	15.1
Middle-income	9	56.3	10,827	58.3	1,085	10.0	4,070	21.9
Upper-income	5	31.3	5,759	31.0	327	5.7	8,253	44.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**16**	**100.0**	**18,573**	**100.0**	**1,852**	**10.0**	**18,573**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	4,022	1,563	8.0	38.9	1,571	39.1	888	22.1
Middle-income	19,053	11,776	60.0	61.8	3,477	18.2	3,800	19.9
Upper-income	8,040	6,278	32.0	78.1	1,254	15.6	508	6.3
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	**31,115**	**19,617**	**100.0**	**63.0**	**6,302**	**20.3**	**5,196**	**16.7**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	343	11.2	297	10.7	22	15.8	24	17.9
Middle-income	1,866	61.0	1,699	60.9	88	63.3	79	59.0
Upper-income	852	27.8	792	28.4	29	20.9	31	23.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**3,061**	**100.0**	**2,788**	**100.0**	**139**	**100.0**	**134**	**100.0**
	Percentage of Total Businesses:			**91.1**		**4.5**		**4.4**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	9	1.6	9	1.6	0	0.0	0	0.0
Middle-income	305	54.9	302	55.0	3	42.9	0	0.0
Upper-income	242	43.5	238	43.4	4	57.1	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**556**	**100.0**	**549**	**100.0**	**7**	**100.0**	**0**	**.0**
	Percentage of Total Farms:			**98.7**		**1.3**		**.0**

Based on 2012 D&B information according to 2010 ACS Boundaries.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NON-METROPOLITIAN OHIO

The bank's lending performance in this assessment area is consistent with the bank's overall lending performance.

The community development test was below the bank's overall community development performance. The bank did not make any community development loans or investments and did not provide any community development services in this assessment area.

APPENDIX A

ASSSESSMENT AREA MAPS

Metropolitan and Non-Metropolitan Assessment Areas
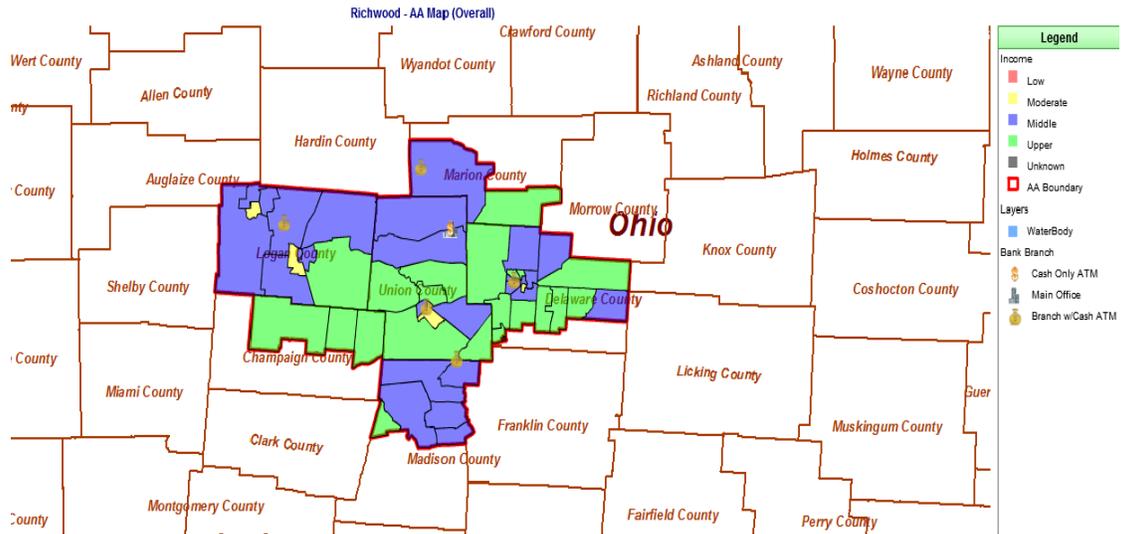
Columbus, OH MSA 18140

Non MSA Ohio

Richwood AA Map (Non MSA OH)
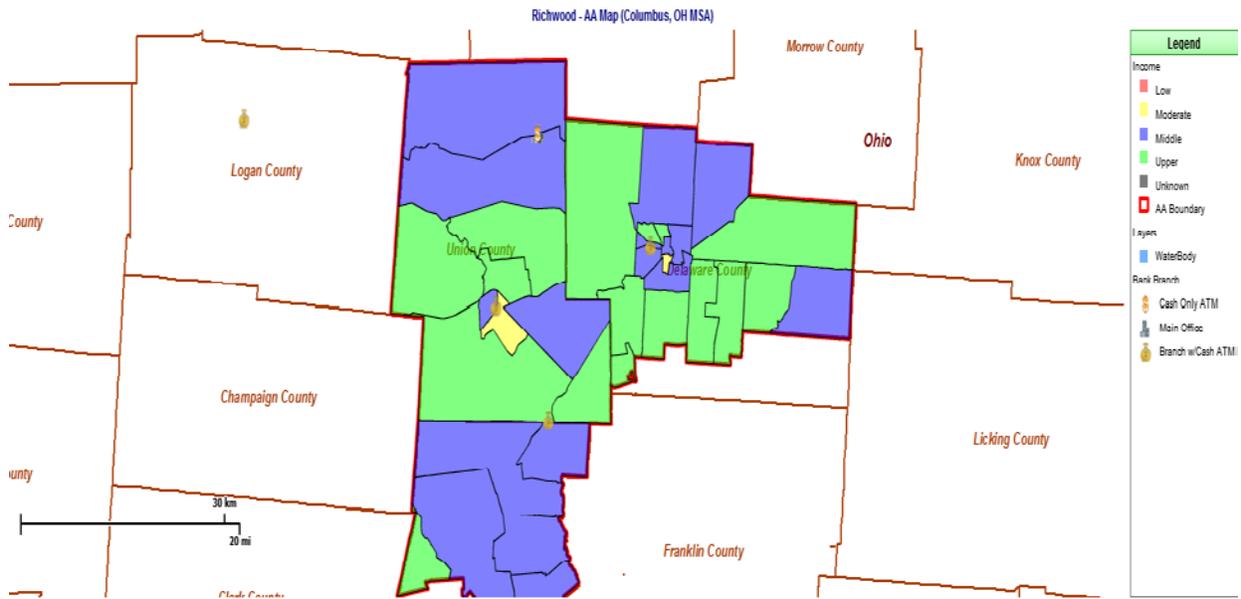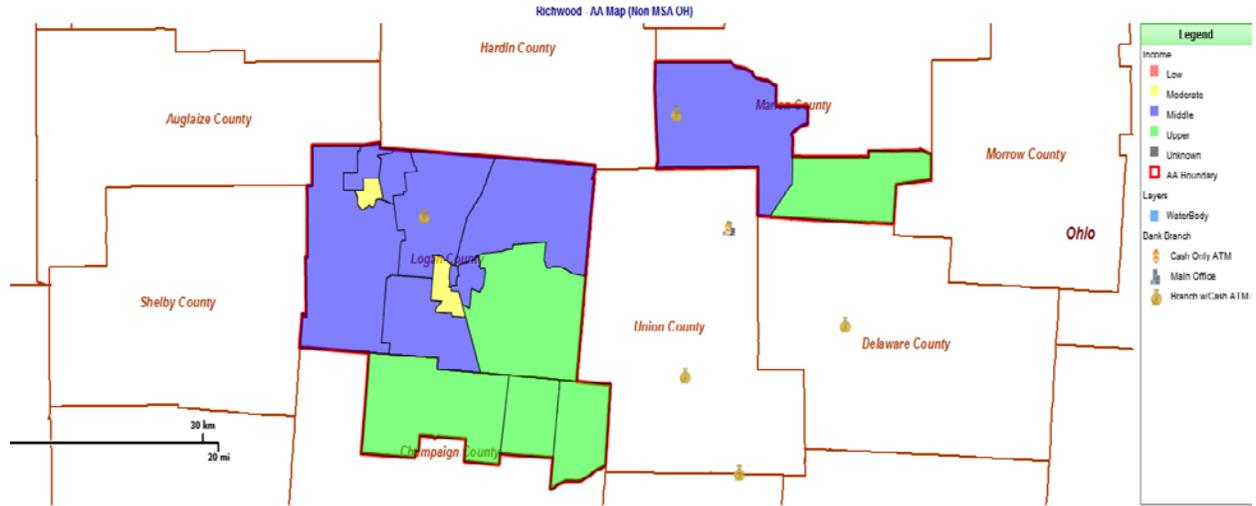
APPENDIX B

LENDING TABLES

CRA Loan Distribution Table

Exam: Richwood Banking Company

Assessment Area/Group: Columbus MSA 18140								
	SMALL BUSINESS				**SMALL FARM**			
Income Categories	**#**	**%**	**$(000s)**	**%**	**#**	**%**	**$(000s)**	**%**
	By Tract Income							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	11	2.1%	3,578	4.9%	0	0.0%	0	0.0%
Low/Moderate Total	11	2.1%	3,578	4.9%	0	0.0%	0	0.0%
Middle	290	56.4%	33,521	46.3%	0	0.0%	0	0.0%
Upper	213	41.4%	35,275	48.7%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	514	100.0%	72,374	100.0%	0	0.0%	0	0.0%
	By Revenue							
Total $1 Million or Less	110	21.4%	5,380	7.4%	0	0.0%	0	0.0%
Over $1 Million	17	3.3%	2,866	4.0%	0	0.0%	0	0.0%
Not Known	387	75.3%	64,128	88.6%	0	0.0%	0	0.0%
Total	514	100.0%	72,374	100.0%	0	0.0%	0	0.0%
	By Loan Size							
$100,000 or less	343	66.7%	14,064	19.4%	0	0.0%	0	0.0%
$100,001 - $250,000	90	17.5%	15,742	21.8%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	75	14.6%	33,923	46.9%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	6	1.2%	8,645	11.9%	0	0.0%	0	0.0%
Total	514	100.0%	72,374	100.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue $1 Million or Less							
$100,000 or less	97	88.2%	2,912	54.1%	0	0.0%	0	0.0%
$100,001 - $250,000	11	10.0%	1,928	35.8%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	2	1.8%	540	10.0%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	110	100.0%	5,380	100.0%	0	0.0%	0	0.0%

CRA Loan Distribution Table

Exam: Richwood Banking Company

Assessment Area/Group: Non-MSA Ohio								
	SMALL BUSINESS				**SMALL FARM**			
Income Categories	**#**	**%**	**$(000s)**	**%**	**#**	**%**	**$(000s)**	**%**
By Tract Income								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	54	65.1%	6,699	39.5%	0	0.0%	0	0.0%
Upper	29	34.9%	10,280	60.5%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	83	100.0%	16,978	100.0%	0	0.0%	0	0.0%
By Revenue								
Total $1 Million or Less	18	21.7%	613	3.6%	0	0.0%	0	0.0%
Over $1 Million	4	4.8%	171	1.0%	0	0.0%	0	0.0%
Not Known	61	73.5%	16,194	95.4%	0	0.0%	0	0.0%
Total	83	100.0%	16,978	100.0%	0	0.0%	0	0.0%
By Loan Size								
$100,000 or less	52	62.7%	1,536	9.0%	0	0.0%	0	0.0%
$100,001 - $250,000	13	15.7%	2,214	13.0%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	14	16.9%	5,940	35.0%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	4	4.8%	7,288	42.9%	0	0.0%	0	0.0%
Total	83	100.0%	16,978	100.0%	0	0.0%	0	0.0%
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	16	88.9%	262	42.7%	0	0.0%	0	0.0%
$100,001 - $250,000	2	11.1%	351	57.3%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	18	100.0%	613	100.0%	0	0.0%	0	0.0%

HMDA Loan Distribution Table

Exam: Richwood Banking Company

Assessment Area/Group: Columbus MSA 18140

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	12	13.3%	800	7.4%
Moderate	5	5.6%	262	2.4%	16	17.8%	1,416	13.1%
Low/Moderate Total	5	5.6%	262	2.4%	28	31.1%	2,216	20.6%
Middle	54	60.0%	5,922	54.9%	18	20.0%	1,420	13.2%
Upper	31	34.4%	4,596	42.6%	39	43.3%	6,674	61.9%
Unknown	0	0.0%	0	0.0%	5	5.6%	470	4.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	90	100.0%	10,780	100.0%	90	100.0%	10,780	100.0%
Refinance								
Low	0	0.0%	0	0.0%	14	10.4%	963	4.8%
Moderate	8	6.0%	1,385	6.9%	25	18.7%	2,583	12.8%
Low/Moderate Total	8	6.0%	1,385	6.9%	39	29.1%	3,546	17.6%
Middle	72	53.7%	9,286	46.0%	34	25.4%	3,990	19.8%
Upper	54	40.3%	9,529	47.2%	58	43.3%	12,268	60.7%
Unknown	0	0.0%	0	0.0%	3	2.2%	396	2.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	134	100.0%	20,200	100.0%	134	100.0%	20,200	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	3	15.0%	18	0.8%
Moderate	1	5.0%	80	3.8%	4	20.0%	178	8.3%
Low/Moderate Total	1	5.0%	80	3.8%	7	35.0%	196	9.2%
Middle	12	60.0%	586	27.5%	5	25.0%	561	26.3%
Upper	7	35.0%	1,467	68.8%	8	40.0%	1,376	64.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	20	100.0%	2,133	100.0%	20	100.0%	2,133	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	100.0%	220	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	1	100.0%	220	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	220	100.0%	1	100.0%	220	100.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	29	11.8%	1,781	5.3%
Moderate	14	5.7%	1,727	5.2%	45	18.4%	4,177	12.5%
Low/Moderate Total	14	5.7%	1,727	5.2%	74	30.2%	5,958	17.9%
Middle	139	56.7%	16,014	48.0%	57	23.3%	5,971	17.9%
Upper	92	37.6%	15,592	46.8%	105	42.9%	20,318	61.0%
Unknown	0	0.0%	0	0.0%	9	3.7%	1,086	3.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	245	100.0%	33,333	100.0%	245	100.0%	33,333	100.0%

*Information based on 2010 ACS data

HMDA Loan Distribution Table

Exam: Richwood Banking Company

Assessment Area/Group: Non-MSA Ohio

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	1	9.1%	35	3.9%
Moderate	1	9.1%	35	3.9%	4	36.4%	259	29.2%
Low/Moderate Total	1	9.1%	35	3.9%	5	45.5%	294	33.1%
Middle	5	45.5%	182	20.5%	2	18.2%	329	37.1%
Upper	5	45.5%	670	75.5%	3	27.3%	248	28.0%
Unknown	0	0.0%	0	0.0%	1	9.1%	16	1.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	11	100.0%	887	100.0%	11	100.0%	887	100.0%
Refinance								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	5	16.7%	407	7.5%
Low/Moderate Total	0	0.0%	0	0.0%	5	16.7%	407	7.5%
Middle	19	63.3%	4,143	76.7%	8	26.7%	878	16.3%
Upper	11	36.7%	1,260	23.3%	16	53.3%	3,598	66.6%
Unknown	0	0.0%	0	0.0%	1	3.3%	520	9.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	30	100.0%	5,403	100.0%	30	100.0%	5,403	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	4	36.4%	39	6.2%
Moderate	1	9.1%	70	11.1%	0	0.0%	0	0.0%
Low/Moderate Total	1	9.1%	70	11.1%	4	36.4%	39	6.2%
Middle	8	72.7%	345	54.6%	0	0.0%	0	0.0%
Upper	2	18.2%	217	34.3%	6	54.5%	578	91.5%
Unknown	0	0.0%	0	0.0%	1	9.1%	15	2.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	11	100.0%	632	100.0%	11	100.0%	632	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	5	9.6%	74	1.1%
Moderate	2	3.8%	105	1.5%	9	17.3%	666	9.6%
Low/Moderate Total	2	3.8%	105	1.5%	14	26.9%	740	10.7%
Middle	32	61.5%	4,670	67.5%	10	19.2%	1,207	17.4%
Upper	18	34.6%	2,147	31.0%	25	48.1%	4,424	63.9%
Unknown	0	0.0%	0	0.0%	3	5.8%	551	8.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	52	100.0%	6,922	100.0%	52	100.0%	6,922	100.0%

*Information based on 2010 ACS data

Consumer Loan Distribution Table

Exam: Richwood Test

Assessment Area/Group : Columbus MSA 18140

	CONSUMER LOANS							
	By Tract Income				**By Borrower Income**			
	#	%	$(000s)	%	#	%	$(000s)	%
	Consumer Loans							
Low	0	0.0%	0	0.0%	30	20.0%	151	8.1%
Moderate	5	3.3%	8	0.4%	22	14.7%	227	12.2%
Low/Moderate Total	5	3.3%	8	0.4%	52	34.7%	378	20.3%
Middle	111	74.0%	1,366	73.2%	18	12.0%	134	7.2%
Upper	34	22.7%	492	26.4%	12	8.0%	133	7.1%
Unknown	0	0.0%	0	0.0%	68	45.3%	1,222	65.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	150	100.0%	1,866	100.0%	150	100.0%	1,866	100.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	27	20.1%	123	9.0%
Moderate	2	1.5%	22	1.6%	27	20.1%	160	11.6%
Low/Moderate Total	2	1.5%	22	1.6%	54	40.3%	283	20.6%
Middle	100	74.6%	1,058	77.0%	13	9.7%	67	4.9%
Upper	32	23.9%	293	21.3%	8	6.0%	190	13.8%
Unknown	0	0.0%	0	0.0%	59	44.0%	833	60.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	134	100.0%	1,373	100.0%	134	100.0%	1,373	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	57	20.1%	275	8.5%
Moderate	7	2.5%	30	0.9%	49	17.3%	386	11.9%
Low/Moderate Total	7	2.5%	30	0.9%	106	37.3%	661	20.4%
Middle	211	74.3%	2,424	74.8%	31	10.9%	201	6.2%
Upper	66	23.2%	784	24.2%	20	7.0%	323	10.0%
Unknown	0	0.0%	0	0.0%	127	44.7%	2,055	63.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	284	100.0%	3,239	100.0%	284	100.0%	3,239	100.0%

Consumer Loan Distribution Table

Exam: Richwood Test

Assessment Area/Group : Non MSA

	CONSUMER LOANS							
	By Tract Income				**By Borrower Income**			
	#	%	$(000s)	%	#	%	$(000s)	%
	Consumer Loans							
Low	0	0.0%	0	0.0%	4	10.5%	10	3.4%
Moderate	0	0.0%	0	0.0%	7	18.4%	147	49.5%
Low/Moderate Total	0	0.0%	0	0.0%	11	28.9%	156	52.9%
Middle	23	60.5%	248	83.8%	0	0.0%	0	0.0%
Upper	15	39.5%	48	16.2%	2	5.3%	5	1.5%
Unknown	0	0.0%	0	0.0%	25	65.8%	135	45.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	38	100.0%	296	100.0%	38	100.0%	296	100.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	4.0%	20	9.3%
Low/Moderate Total	0	0.0%	0	0.0%	1	4.0%	20	9.3%
Middle	20	80.0%	167	77.1%	1	4.0%	3	1.4%
Upper	5	20.0%	49	22.9%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	23	92.0%	193	89.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	25	100.0%	216	100.0%	25	100.0%	216	100.4%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	4	6.3%	10	1.9%
Moderate	0	0.0%	0	0.0%	8	12.7%	167	32.5%
Low/Moderate Total	0	0.0%	0	0.0%	12	19.0%	176	34.5%
Middle	43	68.3%	415	81.0%	1	1.6%	3	0.6%
Upper	20	31.7%	97	19.0%	2	3.2%	5	0.9%
Unknown	0	0.0%	0	0.0%	48	76.2%	328	64.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	63	100.0%	512	100.0%	63	100.0%	512	100.0%

APPENDIX C

GLOSSARY OF TERMS

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

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

Community development: All Agencies have adopted the following language. Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of $1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize:
(i)   Low-or moderate-income geographies;
(ii)   Designated disaster areas; or,
(iii)   Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on:
     a. Rates of poverty, unemployment, and population loss; or
     b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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.

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 (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

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

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

Limited-scope review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments and branch distribution).

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

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

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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

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

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

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

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

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

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

Small loan(s) to business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of $1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

Small loan(s) to farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated 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.

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