



PUBLIC DISCLOSURE

January 29, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The National Bank of Indianapolis
Charter Number: **22652**

107 North Pennsylvania Street, Suite 700
Indianapolis, IN 46204

Office of the Comptroller of the Currency

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Indianapolis, IN 46268-3104

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

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Overall CRA Rating

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

The following table indicates the performance level of The National Bank of Indianapolis with respect to the Lending, Investment, and Service Tests:

Performance Levels	The National Bank of Indianapolis Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		
Low Satisfactory		X	X
Needs to Improve			
Substantial Noncompliance			

*The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- Lending levels that reflect good responsiveness to credit needs in the AA;
- Community development lending which had a significantly positive impact on lending performance;
- The use of innovative or flexible products which had a positive impact on the bank's lending test performance;
- An adequate level of qualified investments; and,
- An adequate level of community development services.

Definitions and Common Abbreviations

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

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

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 MA/assessment area.

Census Tract (CT): 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 areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

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

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, 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 Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

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

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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

Low-Income: Individual 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 MA/assessment area.

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

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

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 multi-state 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 multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have

original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

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

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

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

Description of Institution

The National Bank of Indianapolis (NBI or bank) is a federally chartered national bank serving Indianapolis, Indiana and the surrounding areas. As of December 31, 2017, the bank had total assets of \$2.1 billion and tier 1 capital of \$161.3 million. NBI was founded in 1993 and is wholly owned by The National Bank of Indianapolis Corporation (NBIC), also headquartered in Indianapolis. NBIC does not have any other subsidiaries.

NBI is an intrastate bank, operating 13 branches and 13 automated teller machines (ATMs), this includes one branch opened during the evaluation period, located in an upper-income census tract (CT). The bank has one assessment area (AA), which includes Marion County and parts of Hamilton, Boone, and Johnson Counties. The AA is described below in the Selection of Areas for Full-Scope Review section. According to the June 30, 2017 FDIC Deposit Market Share Report, NBI had deposits totaling \$1.8 billion, or 4.34 percent of the market share in its AA. The bank is ranked eighth in deposit market share and is the largest locally owned bank.

NBI focuses on offering specialized services to professionals, small to medium sized businesses, not-for-profit organizations, and executive clients. NBI offers a broad array of deposit products through its branches, as well as wealth management services. NBI provides diverse lending services including residential mortgages, commercial loans, and consumer loans. NBI's delivery channels include internet banking, mobile banking, remote deposit capture, private banking, and ATMs.

As of December 31, 2017, NBI's loan portfolio totaled \$1.4 billion. The portfolio is composed of 34.3 percent commercial real estate, 28.9 percent residential mortgages, 23.5 percent commercial and industrial loans, 8.3 percent construction loans, 2.6 percent personal loans, and 2.3 percent other loans. Net loans and leases represented 65.7 percent of average assets and 76.5 percent of total deposits.

NBI does not have any legal, financial, or other factors that would impede its ability to meet credit needs in the AA. NBI received a "Satisfactory" rating at their previous Community Reinvestment Act (CRA) evaluation, dated October 26, 2015.

Scope of the Evaluation

Evaluation Period/Products Evaluated

NBI was evaluated using the Large Bank procedures to assess the bank's record of meeting the credit needs of its community. Large Bank procedures include a lending test, investment test, and service test.

For the lending test, we evaluated home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA) and small loans to businesses reported under CRA. The bank did not originate any small farm loans. The evaluation period for the lending test is January 1, 2015 through December 31, 2017. Under the lending test, we performed separate analyses of 2015 through 2016 data and 2017 data. This is due to the changes instituted by the 2015 American Community Survey (ACS), which updated population and housing information. The ACS also resulted in changes to the income designations of some census tracts (CTs). The 2015 through 2016 analysis period will receive more weight than the 2017 analysis period, as this period represents a larger portion of the bank's lending activity. NBI did not change its lending strategy during the two analysis periods.

The evaluation period for community development (CD) loans, the investment test, and the service test is October 27, 2015 through December 31, 2017. This represents the time from the last CRA evaluation through the end of this evaluation period.

Data Integrity

We tested the accuracy of NBI's HMDA and CRA lending data and determined it to be accurate. We also reviewed the appropriateness of CD activities provided for consideration in our evaluation. This included testing of CD loans, investments, and services submitted by NBI to determine if they met the regulatory definition for qualified CD activities. Only those activities meeting the regulatory definition were considered in this evaluation.

Selection of Areas for Full-Scope Review

NBI has only one AA and we performed a full-scope review of the AA. The full-scope review considers performance context, quantitative, and qualitative factors. Refer to Appendix A: Scope of Examination section for more information.

Ratings

As NBI has only one AA, the overall rating is based on the performance in this area. The lending test receives more weight than the investment and service tests in the overall rating. For the lending test, we placed more weight on the bank's performance from January 1, 2015 through December 31, 2016 than their performance from January 1, 2017 through December 31, 2017, as this represents the majority of the evaluation period. Home mortgage loans and small loans to businesses received equal weight under the lending test. The bank originated 1,391 home mortgage loans, totaling \$4.71 million, and 1,541 small loans to businesses, totaling \$4.15 million, during the evaluation period.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c) or §195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

Conclusions with Respect to Performance Tests

LENDING TEST

The bank's performance under the lending test is rated "High Satisfactory".

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the AA is good.

Lending Activity

Lending levels reflect good responsiveness to credit needs in the AA, taking into account the number and amount of home mortgage and small business loans in the AA. The bank's adequate performance in originating home mortgage loans and excellent performance in originating small loans to businesses support this conclusion.

Based upon June 30, 2017 FDIC Deposit Market Share data, NBI achieved a 4.34 percent market share of deposits, ranking them eighth among 39 financial institutions in the AA. Based upon 2017 Peer Mortgage Data, NBI achieved a 0.57 percent market share of home mortgage loans, ranking them 43rd among 549 reporting lenders. Given the strong competition from lenders in the AA, the bank's performance is adequate. While the bank's ranking among lenders in the AA is well below the bank's ranking for deposit market share, the competition for loans in the AA is much stronger. Banks in the AA must not only compete with one another for loans but must also compete with mortgage companies and national lenders. The top five home mortgage lenders account for 20.81 percent of all home mortgage loans in the AA.

Based on 2017 Peer Small Business Data, NBI achieved a 1.83 percent market share of small loans to businesses. This performance ranked them 10th among 125 small business lenders in the AA. Given the competition, the bank's performance is excellent. The top five lenders in the AA accounted for 57.63 percent of loans. These lenders were largely credit card lenders with low average loan sizes (by dollar). NBI's average loan size was \$288,000, compared to the top five lenders whose average loan size was between \$9,000 and \$55,000. When considering market share based on total dollar volume of lending, NBI ranks second in market share, with 9.39 percent of the market share.

Refer to Table 1 Lending Volume in appendix C for the facts and data used to evaluate the bank's lending activity.

Distribution of Loans by Income Level of the Geography

Overall, the bank exhibits an adequate geographic distribution of loans in the AA. The geographic distribution of home mortgage loans is adequate and the distribution of small loans to businesses is good.

Home Mortgage Loans

Overall, the geographic distribution of home mortgage loans is adequate.

The bank's geographic distribution of home mortgage loans in 2015 through 2016 is adequate. The percentage of loans in low-income geographies is significantly below the percentage of owner-occupied housing units but exceeds aggregate lending in those geographies. The percentage of loans in moderate-income geographies is also significantly below the percentage of owner-occupied housing units and is well below aggregate lending in those geographies. Of the rental units located in the AA, 43.35 percent are located in the moderate-income CTs and 35.79 percent of vacant units are also in these CTs. Given the level of rental and vacant units in moderate-income CTs, combined with the strong competition for loans, more weight was given to the performance in low-income CTs. The bank's performance in 2017 is not inconsistent with the performance in 2015 and 2016.

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

Small Loans to Businesses

Overall, the geographic distribution of small loans to businesses is good.

The bank's geographic distribution of small loans to businesses in 2015 through 2016 is good. The percentage of small loans to businesses in low-income geographies is near to the percentage of businesses in those geographies and exceeds aggregate lending. The percentage of small loans to businesses in moderate-income geographies is below the percentage of businesses in those geographies and below aggregate lending. The bank's performance in 2017 is not inconsistent with the performance in 2015 through 2016.

Refer to Table Q in appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

Lending Gap Analysis

We reviewed summary reports and maps and analyzed NBI's lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Inside/Outside Ratio

For the combined three-year evaluation period, NBI originated a substantial majority of all loan products inside the bank's AA. The bank originated 86.8 percent of loans by number and 86.6 percent of loans by dollar inside their AA. The bank originated 84.2 percent of home mortgage loans and 89.2 percent of small loans to businesses, by number, inside their AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution, particularly in its AA, of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the bank. The borrower distribution of home mortgage loans is adequate and the borrower distribution of small loans to businesses is good.

Home Mortgage Loans

Overall, the borrower distribution of home mortgage loans is adequate.

The bank's borrower distribution of home mortgage loans in 2015 through 2016 is adequate. The percentage of loans to low-income borrowers is significantly below the percentage of low-income families in the AA and is somewhat near to aggregate lending. The percentage of loans to moderate-income borrowers is below the percentage of moderate-income families in the AA and is below aggregate lending. Given the need, opportunity and competition for loans in the AA, this performance is adequate. The bank's performance in 2017 was not inconsistent with the performance in 2015 through 2016.

Refer to Table P in appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Small Loans to Businesses

Overall, the borrower distribution of small loans to businesses is good.

The bank's borrower distribution of small loans to businesses in 2015 through 2016 is good. The percentage of small loans to small businesses (businesses with gross annual revenues of \$1.0 million or less) is well below the percentage of small businesses in the AA. This performance is enhanced by the percentage of bank loans being near to aggregate lending. While NBI ranks 12th in market share for small business lending by number of loans, they rank second when looking at total dollar volume of loans. Aggregate lending compares the number of loans originated and not the dollar volume of those loans. Given that the bank ranked 12th in market share and was still near to aggregate lending, more consideration was given to the aggregate lending performance. The bank's performance in 2017 is not inconsistent with performance in 2015 through 2016.

Refer to Table R in appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

Community Development Lending

The bank is a leader in making community development loans.

Community development lending had a significantly positive impact on lending performance in the AA. During the evaluation period, the bank originated 37 qualified CD loans in the AA. The loans totaled \$34.6 million, or 21.46 percent of tier 1 capital. Of the 37 qualified CD loans, 21 were made to organizations providing services to low- and moderate-income individuals (\$20.7

million), 12 were for affordable housing (\$16.7 million), five helped revitalize/stabilize low-income geographies (\$3.3 million), and one supported economic development (\$110,000). Some of the ways CD loans aided the community included providing housing for the homeless, meeting the medical needs for those that can't afford healthcare, increasing the supply of affordable multifamily housing around Indianapolis, and providing job training.

CD Loans - Statewide

In addition to the CD loans that benefit the bank's AA, NBI made two qualified CD loans on a broader statewide/regional area. The loans totaled \$6.3 million and supported affordable housing projects in other parts of Indiana.

Refer to Table 1 Lending Volume in appendix C for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

Product Innovation and Flexibility

NBI uses innovative or flexible lending practices in a safe and sound manner to address the credit needs of LMI individuals or geographies. The use of innovative or flexible products had a positive impact on the bank's lending test performance.

The bank offers two homeownership programs targeted towards LMI borrowers, which offer low or no down payment options. The First Step Mortgage program offers 100 percent financing with no mortgage insurance premiums. The bank made 30 loans under this program, totaling \$2.7 million. The HomeReady Mortgage programs offers loans with low down payment requirements and reduced mortgage insurance premiums. The bank made 74 loans under this program, totaling \$8.6 million. They also offer mortgage programs for individuals completing their medical residency. The number and dollar amount of these loans are included in the totals for home mortgage loans.

The bank also works with borrowers facing foreclosure by offering loan modifications. Loan modifications help borrowers maintain their homes through difficult times. The bank modified three loans during the evaluation period, totaling \$254,000.

INVESTMENT TEST

The bank's performance under the investment test is rated "Low Satisfactory". The bank has an adequate level of qualified investments, particularly those that are not routinely provided by private investors, although rarely in a leadership position.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the AA is adequate.

During the evaluation period, the bank made two investments in its AA totaling \$1.7 million. The bank also received credit for one prior period investment, still outstanding, totaling

\$500,000. In addition to these investments, NBI made 188 qualified donations totaling \$461,286. The investments and donations total \$2.7 million, or 1.66 percent of tier 1 capital.

NBI exhibits good responsiveness to credit and community development needs within its AA. Community contacts noted small business lending and multifamily affordable housing as needs in the community. All investments were directed to small business lending or affordable housing and many of the donations were directed to organizations that provide services or funding for affordable housing. Of the \$2.7 million in investments and donations, \$2.3 million were directed to affordable housing and small businesses. The bank makes no use of innovative or complex qualified investments.

Investments - Statewide

In addition to the CD investments that directly benefit the bank's AA, NBI made three qualified investments in Indiana. The investments totaled \$2.2 million and supported affordable housing projects. When combined with the investments made in the bank's AA, CD investments total \$4.9 million, or 3.04 percent of tier 1 capital. These investments had a positive impact on the investment test rating.

Refer to Table 14 in appendix C for the facts and data used to evaluate the bank's level of qualified investments.

SERVICE TEST

The bank's performance under the service test is rated "Low Satisfactory".

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's provides an adequate level of CD services.

Retail Banking Services

NBI's service delivery systems are reasonably accessible to geographies and individuals of different income levels in its AA. The bank has no branches located in low-income CTs and one branch located in a moderate-income CT. Consideration was also given to branches located within one mile of LMI CTs. The bank has one branch in close proximity to a low-income CT and one in close proximity to a moderate-income CT.

To the extent that changes in branch locations have been made, the bank's record of opening and closing branches has not adversely affected the accessibility of their delivery systems, particularly in LMI geographies or to LMI individuals. The bank opened one branch during the evaluation period, located in an upper-income CT. They did not close any branches during the evaluation period.

The bank's services, including business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and individuals. Services offered and banking hours are comparable among locations regardless of the income level of the geography.

Management complements its traditional service delivery methods with certain alternative delivery processes, including online banking, mobile banking, ATMs, remote deposit capture, and telephone banking; these delivery methods provide increased access to banking services throughout all areas in the AA. We placed no significant weight on these alternative delivery systems, as the bank did not maintain metrics to determine their effectiveness in helping to meet the credit needs of LMI individuals.

Refer to Table 15 in appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Community Development Services

NBI provides an adequate level of community development services. Within the AA, 15 employees were involved in CD services for 16 different organizations. Of the services performed, 10 demonstrated leadership by serving on the board or committee of the organizations. Most of the activities were for organizations that provide services to LMI individuals, while some of the organizations promote affordable housing, economic development, and revitalization/stabilization of LMI geographies. Employees spent over 1,000 hours volunteering with these organizations. Additionally, the bank participated in a program which offers financial literacy classes to foster children and helps them establish bank accounts, save, and obtain micro loans.

Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test (excludes CD Loans): 01/01/2015 to 12/31/2017 Investment and Service Tests and CD Loans: 10/27/2015 to 12/31/2017	
Financial Institution	Products Reviewed	
The National Bank of Indianapolis (NBI) Indianapolis, Indiana	Home Mortgage Loans Small Loans to Businesses	
Affiliate(s)	Affiliate Relationship	Products Reviewed
No affiliates included in review.		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Indianapolis MSA	Full-Scope	Portion of MSA # 26900 – Marion County and portions of Boone, Hamilton, and Johnson Counties

Appendix B: Community Profiles for Full-Scope Areas

Indianapolis MSA AA

2015 – 2016

Table A – Demographic Information of the Assessment Area						
Assessment Area: Indianapolis MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	263	17.5	31.2	27.4	24.0	0.0
Population by Geography	1,169,334	11.7	29.0	27.4	32.0	0.0
Housing Units by Geography	516,722	13.8	31.1	27.5	27.6	0.0
Owner-Occupied Units by Geography	284,182	7.7	22.8	30.4	39.2	0.0
Occupied Rental Units by Geography	166,934	18.3	43.4	24.9	13.5	0.0
Vacant Units by Geography	65,606	29.1	35.8	21.8	13.3	0.0
Businesses by Geography	78,210	7.2	22.0	33.0	37.8	0.0
Farms by Geography	1,500	6.1	19.9	30.3	43.7	0.0
Family Distribution by Income Level	281,036	23.9	16.9	18.9	40.4	0.0
Household Distribution by Income Level	451,116	25.1	17.5	17.8	39.6	0.0
Median Family Income MSA - 26900 Indianapolis-Carmel-Anderson, IN MSA		\$64,663	Median Housing Value			\$148,182
			Median Gross Rent			\$745
			Families Below Poverty Level			11.0%

Source: 2010 U.S. Census and 2016 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.

2017

Table A – Demographic Information of the Assessment Area						
Assessment Area: Indianapolis MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	263	22.4	30.4	22.4	24.3	0.4
Population by Geography	1,209,052	15.9	27.1	23.9	33.0	0.2
Housing Units by Geography	529,390	17.6	29.0	23.0	30.1	0.2
Owner-Occupied Units by Geography	276,917	9.6	20.8	27.1	42.3	0.1
Occupied Rental Units by Geography	190,967	24.0	38.7	19.6	17.4	0.3
Vacant Units by Geography	61,506	33.6	35.9	15.4	14.6	0.6
Businesses by Geography	83,435	11.1	20.8	27.3	40.6	0.2
Farms by Geography	1,610	9.4	18.0	26.3	46.1	0.2
Family Distribution by Income Level	286,124	25.0	16.9	18.0	40.1	0.0
Household Distribution by Income Level	467,884	26.4	17.0	17.0	39.6	0.0
Median Family Income MSA - 26900 Indianapolis-Carmel-Anderson, IN MSA		\$66,803	Median Housing Value			\$144,907
			Median Gross Rent			\$830
			Families Below Poverty Level			13.1%
<i>Source: 2015 ACS Census and 2017 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The Indianapolis MSA AA consists of 263 CTs and encompasses portions of Boone, Hamilton, and Johnson counties, and all of Marion County. NBI has 13 branches and 13 deposit-taking ATMs in the AA. According to the 2010 US Census, there were 46 low-income CTs, 82 moderate-income CTs, 72 middle-income CTs, and 63 upper-income CTs in the AA. The AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income CTs.

The AA changed due to the 2015 American Community Survey (ACS) updates. According to the updated census information, the AA has 59 low-income CTs, 80 moderate-income CTs, 59 middle-income CTs, 64 upper-income CTs, and one CT that has not been assigned an income classification.

Competition

Competition in the Indianapolis MSA AA for deposits is strong. As of June 30, 2017, NBI's deposits in the AA totaled \$1.8 billion, or 4.3 percent of the total market share. According to the FDIC Deposit Market Share Report, NBI ranks eighth out of 39 deposit-taking institutions in the AA. The top five institutions, for deposit market share in the AA, are JPMorgan Chase, PNC, Fifth Third, The Huntington NB, and BMO Harris. These institutions account for 66.2 percent of deposit market share.

Competition for loans is also strong. Based on 2017 peer mortgage data, 549 lenders originated or purchased residential real estate loans in the AA. NBI ranks 43rd, with 0.57 percent of the market share, by number of loans originated. The top five lenders are Caliber Home Loans, JPMorgan Chase, Wells Fargo, Quicken Loans, and The Huntington NB. These lenders account for 20.8 percent of the market share, by number of loans originated.

Based on 2017 peer small business loan data, 125 lenders originated or purchased small business loans in the AA. The top five small business lenders are Chase Bank, American Express, PNC, Capital One, and CitiBank. These lenders account for 57.6 percent of the market share, by number of loans originated. NBI accounts for 1.8 percent of the market share and ranks 10th.

Employment and Economic Factors

According to the Bureau of Labor Statistics, the average annual unemployment rate for the counties within the Indianapolis AA improved during the review period. The average annual unemployment rate in all counties except Marion County was below the unemployment rate for the state of Indiana during the review period, as the quick pace of job creation was sufficient to absorb the influx of new workers. The table below summarizes the average annual unemployment rate for the state and NBI’s AA.

Average Unemployment Rate			
	2015	2016	2017
State of Indiana	4.8%	4.4%	3.5%
Boone County	3.7%	3.4%	2.8%
Hamilton County	3.4%	3.2%	2.7%
Johnson County	4.1%	3.6%	2.9%
Marion County	5.1%	4.5%	3.6%

Source: Bureau of Labor Statistics; Not Seasonally Adjusted

The leading industries in the area are professional/business services and education/health services according to the October 2018 Moody’s Analytics Report. The top five employers are IU Health Services, St. Vincent Hospitals, Eli Lilly, Community Health Network, and Wal-Mart.

According to the 2010 U.S. Census, the total population of the AA was 1,169,334 with 11.0 percent of families living below the poverty level. Low-income families represent 23.9 percent of families in the AA and moderate-income families represent 16.9 percent of families. According to the 2015 ACS, the total population of the AA was 1,209,052 with 13.1 percent of families living below the poverty level.

Housing

According to the 2010 US Census, 55.0 percent of housing in the AA was owner-occupied, 32.3 percent were rental properties, and 12.7 percent were vacant. In low-income CTs in the AA, 30.5 percent of houses were owner-occupied, 42.8 percent were renter occupied, and

26.7 percent were vacant. In moderate-income CTs, 40.3 percent of houses were owner-occupied, 45.1 percent were renter occupied, and 14.6 percent were vacant. Low- and moderate-income CTs accounted for 59.1 percent of multi-family housing units in the AA. The median age of the housing stock in the AA was 43 and the median housing value was \$161,563.

According to the 2015 ASC, 52.3 percent of housing in the AA was owner-occupied, 36.1 percent were rental properties, and 11.6 percent were vacant. In low-income CTs in the AA, 28.6 percent of houses were owner-occupied, 49.2 percent were renter occupied, and 22.2 percent were vacant. In moderate-income CTs, 37.5 percent of houses were owner-occupied, 48.1 percent were renter occupied, and 14.4 percent were vacant. Low- and moderate-income CTs account for 58.5 percent of multi-family housing units in the AA. The median age of the housing stock in the AA was 43 years and the median housing value was \$165,487.

Community Contacts

Two community contacts were performed with economic development organizations that serve the Indianapolis MSA. One organization felt that their needs are generally met. However, there is a need for investments/financing for projects that are available now but will not be developed until a later date. A representative from another organization noted increasing poverty in the area and a need for more affordable housing near transit lines. The representative also noted a need for capital to purchase property for future projects.

Appendix C: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases; (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems.

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (h) - 6 and - 7 for guidance on when a bank may receive positive CRA consideration for such loans.
- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. Because small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.

Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. The table also presents aggregate peer data for the years the data is available.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Table 1. Lending Volume

LENDING VOLUME		Geography: INDIANA						Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2017				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Indianapolis MSA	100.00	1,171	396,012	1,374	371,214	0	0	37	34,615	2,582	801,841	100.00

* Loan Data as of December 31, 2017. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is October 27, 2015 to December 31, 2017.

*** Deposit Data as of June 30, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2015-16
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Indianapolis MSA	835	272,329	100.0	44,504	7.7	3.6	2.9	22.8	9.3	16.6	30.4	21.9	30.4	39.2	65.2	50.1	0.0	0.0	0.0
Total	835	272,329	100.0	44,504	7.7	3.6	2.9	22.8	9.3	16.6	30.4	21.9	30.4	39.2	65.2	50.1	0.0	0.0	0.0

*Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Indianapolis MSA	318	113,538	100.0	40,945	9.6	4.4	5.7	20.8	12.3	19.0	27.1	18.9	28.4	42.3	64.5	46.8	0.1	0.0	0.0
Total	318	113,538	100.0	40,945	9.6	4.4	5.7	20.8	12.3	19.0	27.1	18.9	28.4	42.3	64.5	46.8	0.1	0.0	0.0

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2015-16		
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Indianapolis MSA	835	272,329	100.0	44,504	23.9	4.6	7.3	16.9	12.7	16.8	18.9	9.3	17.9	40.4	69.7	40.6	0.0	3.7	17.5	
Total	835	272,329	100.0	44,504	23.9	4.6	7.3	16.9	12.7	16.8	18.9	9.3	17.9	40.4	69.7	40.6	0.0	3.7	17.5	

*Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2017		
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Indianapolis MSA	318	113,538	100.0	40,945	25.0	6.3	9.2	16.9	13.5	18.5	18.0	9.4	19.8	40.1	67.6	35.6	0.0	3.1	16.9	
Total	318	113,538	100.0	40,945	25.0	6.3	9.2	16.9	13.5	18.5	18.0	9.4	19.8	40.1	67.6	35.6	0.0	3.1	16.9	

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2015-16		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Indianapolis MSA	920	240,423	100.0	22,824	7.1	6.8	6.5	21.9	14.6	18.7	33.1	37.4	30.6	37.9	41.2	44.2	0.0	0.0	0.0		
Total	920	240,423	100.0	22,824	7.1	6.8	6.5	21.9	14.6	18.7	33.1	37.4	30.6	37.9	41.2	44.2	0.0	0.0	0.0		

*Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Indianapolis MSA	446	129,607	100.0	21,206	11.1	10.5	10.8	20.8	11.9	18.1	27.3	31.4	26.5	40.6	45.7	44.2	0.2	0.4	0.3		
Total	446	129,607	100.0	21,206	11.1	10.5	10.8	20.8	11.9	18.1	27.3	31.4	26.5	40.6	45.7	44.2	0.2	0.4	0.3		

*Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2015-16
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Indianapolis MSA	920	240,423	100.0	22,824	80.4	34.0	37.7	7.5	51.0	12.2	15.0
Total	920	240,423	100.0	22,824	80.4	34.0	37.7	7.5	51.0	12.2	15.0
<i>Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Indianapolis MSA	446	129,607	100.0	21,206	81.1	48.9	44.6	7.2	46.0	11.8	5.2
Total	446	129,607	100.0	21,206	81.1	48.9	44.6	7.2	46.0	11.8	5.2
<i>Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>											

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: INDIANA									
Evaluation Period: OCTOBER 27, 2015 TO DECEMBER 31, 2017									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Indianapolis MSA	1	500	190	2,180	191	2,680	54.68	0	0
IN Statewide with P/M/F to serve AA	3	2,221	0	0	3	2,221	45.32	0	0

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

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

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS													Geography: INDIANA				
													Evaluation Period: OCTOBER 27, 2015 TO DECEMBER 31, 2017				
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography*			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Indianapolis MSA	100.00	13	100.00	0.00	7.70	46.15	46.15	1	0				+1	15.9	27.1	23.9	33.0

**Source: 2015 ACS Census and 2017 D&B Data
Due to rounding, totals may not equal 100.0*