

## Overall CRA Rating

**Institution's CRA Rating:** This institution is rated Outstanding.

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

Performance Levels	Fifth Third Bank, National Association Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	X
High Satisfactory			
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- The Lending Test rating is based on excellent performance in 13 of the 16 rating areas, good performance in two rating areas, and adequate performance in one rating area.
- The Investment Test rating is based on excellent performance in 12 of the 16 rating areas, good performance in one rating area, adequate performance in two rating areas, and poor performance in one rating area.
- The Service Test rating is based on excellent performance in 10 of the 16 rating areas, good performance in five rating areas, and adequate performance in one rating area.

### Lending in Assessment Area

A high percentage of the bank's loans were in its assessment areas (AAs).

The bank originated and purchased 81 percent of its total loans inside its AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. This factored favorably into the geographic distribution of lending by income level of the geography.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	266,531	76.3	82,914	23.7	349,445	46,150,789	64.1	25,894,467	35.9	72,045,255
Small Business	115,493	94.6	6,561	5.4	122,054	12,339,337	89.7	1,418,054	10.3	13,757,391
Small Farm	980	91.1	96	8.9	1,076	53,681	88.5	6,975	11.5	60,656
Total	383,004	81.0	89,571	19.0	472,575	58,543,807	68.2	27,319,496	31.8	85,863,302

## Description of Institution

Fifth Third Bank, National Association (FTB, bank, or institution) is an interstate bank headquartered in Cincinnati, Ohio and owned by Fifth Third Bancorp. Fifth Third Bancorp is a diversified financial services company, also headquartered in Cincinnati. As of December 31, 2021, FTB had \$209.7 billion in assets, ranking it as the 13<sup>th</sup> largest U.S. commercial bank, with \$176.3 billion in deposits and \$16.7 billion in tier 1 capital.

As of December 31, 2021, FTB had a network of 1,117 branch office locations and 2,320 automated teller machines (1,649 deposit-taking ATMs) in 11 states that included Florida, Georgia, Illinois, Indiana, Kentucky, Michigan, North Carolina, Ohio, South Carolina, Tennessee, and West Virginia.

Fifth Third Community Development Company, LLC (FTCDC) is a holding company nonbank subsidiary organized primarily for making investments in small business investment companies (SBIC), other qualifying business ventures, and affordable housing tax credit investments. FTCDC is a primary contributor to FTB's investment test under CRA.

Fifth Third Foundation is part of the Foundation Office within FTB. Established in 1948, Fifth Third Foundation was one of the first charitable foundations created by a financial institution. It supports worthy causes in the areas of health and human services, education, community development, and the arts in the states where FTB operates.

On March 22, 2019, FTB completed an acquisition of MB Financial, Inc., a Chicago-based holding company for MB Financial Bank, National Association (MB Financial Bank), which had approximately \$20 billion in assets. MB Financial Bank was regulated by the OCC and received an "Outstanding" rating on its last CRA evaluation dated January 17, 2017.

Fifth Third Bank converted from an Ohio state-chartered bank to a national bank on November 14, 2019. Its prior CRA evaluation was conducted by the Federal Reserve Bank of Cleveland as of November 28, 2016, and the bank was rated "Outstanding."

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The OCC evaluated home mortgage loans, small loans to businesses and farms, community development (CD) loans, qualified investments, and retail and CD services from January 1, 2017, to December 31, 2021, except for the state of South Carolina, which was evaluated from January 1, 2021, to December 31, 2021. FTB did not branch into South Carolina until September 2020. Examiners did not consider consumer loans in this evaluation, as consumer lending did not constitute a substantial majority of the bank's business and management did not request consideration. Qualifying activities performed in response to the significant impact of the coronavirus pandemic (COVID-19) across the United States were also considered in this evaluation.

Generally, the OCC considers CRA evaluation periods to begin on the conversion date to a national bank charter. However, to ensure that the OCC considered all CRA activities, examiners used a CRA evaluation period start date that went back to the end date of the previous CRA evaluation period, without regard to the charter conversion date.

### Lending Test

The OCC evaluated home mortgage and small loans to businesses in each AA. In most markets, FTB made few, if any, small loans to farms as farm lending is not a primary product for the bank. Some of the bank's AAs that contain more rural geographies had sufficient small loans to farms to analyze. The OCC determined that 20 loans originated within an AA was sufficient for analysis purposes. Due to the limited number of farms in low- and moderate-income geographies, small farm lending had no material impact on the Lending Test conclusions. If examiners included an analysis of these loans in a rating area, they noted it in the narrative for the applicable rating area. Tables related to small loans to farms where the bank had no lending (state of South Carolina) were removed from appendix D.

The OCC determined lending activity responsiveness in each AA by comparing the bank's market rank percentage for deposits to each lending product market rank percentage. Examiners divided the bank's market rank by the total number of depository institutions or lenders, respectively. This approach takes into consideration the differences between the number of insured depository institutions and the number of home mortgage, small business, and small farm lenders within the AA.

The OCC generally gave equal weighting to geographic and borrower distribution components of the Lending Test. When evaluating the geographic distribution of loans, the OCC gave greater weight to FTB's performance in moderate-income tracts in instances where there were a limited number of owner-occupied housing units or businesses in the low-income tracts. When evaluating the distribution of home mortgage loans based on the income level of the borrower, the OCC considered the poverty level of the AA as well as the significant affordability barriers that exist in many of FTB's markets. The OCC also considered the volume of CD loans and the degree of responsiveness of those loans to the needs in the community.

### Investment Test

The OCC gave equal consideration to the volume of investments and grants made during the current evaluation period and those made in prior evaluation periods that remained outstanding. The OCC also considered how responsive the investments were to the needs of the communities. In most AAs, the investments were considered non-complex. FTB used low-income housing tax credits (LIHTC) in many AAs.

### Service Test

The OCC gave primary consideration to FTB's performance in delivering retail products and services to geographies and individuals of different income levels through FTB's distribution of branches. The OCC focused on branches in low- and moderate-income geographies. The OCC evaluated the range of products and services offered by FTB through its branch network with emphasis on accessibility to low- and moderate-income borrowers. Products and services offered are consistent throughout the branch network. The OCC specifically focused on any differences in branch hours and services in low- and moderate-income geographies compared to those in middle- and upper- income geographies. FTB offers a wide range of traditional deposit and banking products and services. While the bank offers multiple alternative delivery systems commensurate with standard industry offerings including ATMs, telephone and online banking, electronic bill-pay, remote deposit capture, and mobile banking options, examiners did not consider these systems as there was insufficient data to determine their effectiveness in targeting low- and moderate-income individuals or geographies. The OCC evaluated the level of retail services provided to low- and moderate-income borrowers through bank-provided analysis. Examiners evaluated FTB's record of providing CD services. The OCC's primary consideration was the responsiveness of the services to the needs of the community. The OCC gave the most consideration to CD services that addressed critical needs or were most impactful to the AA.

In the full-scope AAs, examiners considered branches located in middle- and upper income geographies that served and improved access for low- and moderate-income customers or customers in low- and moderate-income geographies in one of two ways. Examiners gave positive consideration when a middle- and upper income branch was “across the street” (less than 1,000 feet) from a low- or moderate-income geography. Examiners also considered middle- and upper income branches that, based on documentation provided by the bank, showed that the branch served low- and moderate-income customers. Positive consideration was given if the percentage of low- and moderate-income customers (based on modeled customer income) that used a branch located in a middle- or upper-income geography exceeded 75 percent of the branch’s customer base. Consideration was given to each middle- and upper income branch only once.

### **Selection of Areas for Full-Scope Review**

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

### **Ratings**

The bank’s overall rating is a blend of the state ratings and multistate ratings.

The Cincinnati CSA, Chicago CSA, and the states of Michigan and Ohio received the greatest weight in arriving at the overall rating. Combined, these areas accounted for nearly 72 percent of the bank’s total deposits and 64 percent of lending during the evaluation period. Home mortgage lending received substantially greater weight than small loans to businesses due to home mortgage lending being a higher percentage of total lending volume. Small loans to farms accounted for less than one-half of one percent of total lending and had minimal effect on the overall rating.

The MMSA/CSA and state ratings are based on performance in all bank AAs. Refer to the “Scope” section under each State and MMSA/CSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

### **Other Information**

AA – The OCC determined that all AAs consisted of whole geographies and met the requirements of the regulation. The areas reasonably reflected the different trade areas that FTB’s branches service and did not arbitrarily exclude any low- and moderate-income areas.

Deposit Market Share – The OCC used summary deposit data reported to the Federal Deposit Insurance Corporation (FDIC) as of June 30, 2021. This was the most recent public data available during the evaluation period.

Lending Market/Peer Data – Due to timing and release of data, the OCC used 2021 peer mortgage data and 2020 peer small loans to businesses and farms data reported to the Federal Financial Institutions Examination Council.

Unemployment rate – The unemployment rates referenced are the MSA non-seasonally adjusted rate as published monthly by the U.S. Bureau of Labor Statistics. In a CSA, the rate is for the MSA comprising most of the CSA.

Financial Empowerment Mobile/E-bus – The bank, after its conversion to a national bank, continued its unique partnership with The Community College Foundation to sponsor the Financial Empowerment Mobile, also known as the E-Bus. The E-Bus is a 40-foot, retrofitted vehicle staffed by FTB employees and equipped with onboard computer workstations and internet connectivity. The E-Bus travels throughout the bank's markets to reach neighborhoods in low- and moderate-income geographies that have been traditionally underserved by banks and is occasionally used for marketing events, such as a new banking center location, or community events. During the COVID-19 pandemic, the bank conducted virtual E-Bus events.

Flexible and Innovative Lending Products – The bank's innovative and flexible loan product offerings include both bank-developed and government-sponsored loan programs that help to meet the credit needs of low- and moderate-income borrowers. Although products provided through the federal or state governments are not necessarily innovative, the loan products provide flexibility to consumers and businesses seeking financing. A summary of FTB's innovative and/or flexible loan products or programs offered are as follows:

53 Community Mortgage – Offers low- and moderate-income borrowers the ability to make high loan-to-value (LTV) purchase and refinance transactions. The program offers reduced lender fees and can be combined with FTB's Down Payment Assistance (DPA) product if the subject property is in a low- and moderate-income geography.

Federal Housing Administration (FHA) – Allows for high LTV purchase and refinance transactions. The program allows for low down payment options, flexible sources for down payment, low minimum credit score and is aimed at borrowers who may not qualify for traditional financing. There are no area median income (AMI) or property location requirements.

Freddie Mac Home Possible (Freddie Mac HP) – Allows high LTV purchase and refinance transactions for borrowers whose qualifying income is at or below 80 percent of the AMI.

Freddie Mac Refi Possible (Freddie Mac RP) – Refinance option for low-income borrowers with loans currently backed by Freddie Mac. May allow borrowers, who previously could not or did not refinance, the opportunity to refinance with lower closing costs and better pricing.

Fannie Mae Home Ready (Fannie Mae HR) – Product that allows high LTV purchase and refinance transactions for borrowers at or below 80 percent of the AMI.

Fannie Mae Home Refi Now (Fannie Mae RN) – Refinance option for low-income borrowers with loans currently backed by Fannie Mae. May allow borrowers, who previously could not or did not refinance, the opportunity to refinance with lower closing costs and better pricing.

United States Department of Agriculture/Rural Housing Services (USDA/RHS) – No down payment purchase and 100 percent refinance transactions, in rural areas, for borrowers with household income below the AMI. The program requires an upfront guarantee fee that can be financed and monthly mortgage insurance.

Veterans Administration (VA) – Federal mortgage loan programs to help veterans and their families obtain home financing.

Illinois Housing Development Authority (IHDA) – Group of products (conventional, FHA, VA, USDA/RHS, et al.) permitting high LTV purchase transactions on properties at or below IHDA sales price limits and for income at or below IHDA requirements. IHDA also offers borrowers down payment and closing cost assistance.

Kentucky Housing Corporation (KHC) – Group of products (conventional, FHA, VA, USDA/RHS, et al.) permitting high LTV purchase transactions on properties at or below KHC sales price limits and for applicant income at or below KHC requirements. KHC also offers borrowers down payment and closing cost assistance.

Michigan State Housing Development Authority (MSHDA) – Group of products (FHA, VA, USDA/RHS, and MSHDA DPA) permitting high LTV purchase transactions on properties at or below MSHDA sales price limits and for borrowers with household income at or below MSHDA requirements. MSHDA also offers borrowers down payment and closing cost assistance.

Young Bankers Club (YBC) – Proprietary program targeted to elementary schools located in low- and moderate-income geographies to educate students on the importance of financial responsibility over a five- to ten-week curriculum in money management and economics. The program meets local and state educational standards for both mathematics and social studies.