



PUBLIC DISCLOSURE

April 10, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Park National Bank
Charter Number 9179

50 North Third Street
Newark, OH 43055

Office of the Comptroller of the Currency

655 Metro Place South
Suite 625
Dublin, OH 43017

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 Park National Bank with respect to the Lending, Investment, and Service Tests:

Performance Levels	The Park National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	X
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 primarily based on the performance in the state of Ohio, as this rating area has the most branches, the highest level of deposits, and the most significant volume of lending. A substantial majority of the bank’s loans are located within its assessment areas. The bank has a good distribution of loans in low- and moderate-income (LMI) geographies and to LMI individuals.
- The Investment Test rating is primarily based on the performance in the state of Ohio, as this rating area has the most branches, the highest level of deposits, and the most significant volume of lending. The bank made a good level of qualified community development (CD) investments and grants across the rating areas.
- The Service Test rating is primarily based on the performance in the state of Ohio, as this rating area has the most branches, the highest level of deposits, and the most significant volume of lending. The bank provided a relatively high level of CD services across the rating areas, especially considering the limitations posed by the COVID-19 pandemic. Service delivery systems are accessible to geographies and individuals of different income levels in the bank’s footprint.

Lending in Assessment Area

A substantial majority of the bank’s loans are in its assessment areas (AAs).

The bank originated and purchased 90.2 percent of its total loans inside the bank’s AAs during the

evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	13,825	89.9	1,552	10.1	15,377	2,313,732	86.4	363,463	13.6	2,677,195
Small Business	9,583	91.1	933	8.9	10,516	1,178,780	87.4	170,321	12.6	1,349,101
Small Farm	1,073	87.0	161	13.0	1,234	62,275	83.2	12,565	16.8	74,840
Total	24,481	90.2	2,646	9.8	27,127	3,554,787	86.7	546,349	13.3	4,101,136

Home mortgage and small business loans are considered primary products of the bank. These products have a greater direct impact and are more responsive to credit needs in the bank's AAs. Small farm loans are considered only in those AAs where the bank originated 20 or more small farm loans; however, less weight is given to small farm loans as they constitute a very small percentage of overall lending. Conclusions are factored into the overall analysis of the geographic distribution of lending by income level.

Description of Institution

Park National Bank (PNB, Park, or bank) is a national bank headquartered in Newark, Ohio. As of December 31, 2021, the bank had total assets of \$9.5 billion and tier 1 capital of \$825 million. Park is wholly owned by the Park National Corporation, also headquartered in Newark. Affiliated organizations are associated with specialty financing and asset management services and are not considered in this evaluation.

PNB is an interstate bank, operating 93 full-service offices and 80 deposit-taking automated teller machines (ATMs), as of December 31, 2021. PNB operates in four states and has 11 AAs. The state of Kentucky has one AA, the Louisville-Jefferson County MSA AA (Louisville MSA). The state of North Carolina has two AAs, the Asheville MSA and the Charlotte-Concord-Gastonia MSA (Charlotte MSA) AAs. The state of Ohio has six AAs, the Cincinnati MSA, Columbus MSA, Dayton-Kettering MSA (Dayton MSA), Mansfield MSA, non-MSA portions of Ohio (OH non-MSA), and the Springfield MSA AAs. The state of South Carolina has two AAs, the Greenville-Anderson MSA (Greenville MSA) and the Spartanburg MSA AAs. The bank did not acquire any institutions during the review period or expand into new AAs. Park closed 25 branches and opened one branch during the review period. Closures are centered in the Ohio AAs, with one closure in North Carolina. Branch closures resulted in the removal of one county from the Columbus MSA AA, two counties from the Cincinnati MSA AA, and one county from the Charlotte MSA AA.

Park offers a full range of credit products, trust services, and non-depository investment services. The bank's primary focus is residential real estate lending and commercial real estate lending. Park also offers installment loans to individuals and commercial and industrial loans. The bank offers Federal Housing Administration, Veteran's Affairs, and first-time homebuyer mortgage products.

The bank offers a full range of traditional depository accounts and services through its retail branches. The bank also offers alternative banking products and services, such as online banking, mobile banking, electronic statements, electronic bill pay, direct deposit, 24-hour banking by phone, and wire transfers.

As of December 31, 2021, net loans and leases total \$6.8 billion. The portfolio is composed of 30.5 percent commercial real estate, 24.7 percent residential mortgage, 23.9 percent personal, 13.9 percent commercial and industrial, and 7 percent other various loans. Net loans and leases represent 71.2 percent of total assets and 83.2 percent of total deposits. Deposits total \$8.2 billion, with the Columbus MSA and Ohio Non-MSA AAs accounting for the majority of deposits held.

COVID-19 Pandemic

In March 2020, the World Health Organization declared COVID-19 a pandemic. In response to the pandemic, the United States was under a shelter-in-place order in an effort to limit the spread of the virus. Due to the shelter-in-place orders, certain businesses deemed non-essential were shut down or limited in operations. The pandemic limited the ability of bank personnel to provide in-person services. The evaluation of the bank's performance takes into consideration the impact of the pandemic.

During the evaluation period, the bank participated in the Small Business Administration's Paycheck Protection Program (PPP), which helped businesses keep their workforce employed during the pandemic. The bank also offered several modification programs to help borrowers stay in their homes. These modification programs included standard and hardship modifications, the Home Affordable Modification Program, Save the Dream, the Freddie Mac Streamlined Modification, and the Flex Modification programs.

There were no other known legal, financial, or other factors that would impede its ability to meet credit needs in the AA. Park received a "Satisfactory" rating at their previous Community Reinvestment Act (CRA) evaluation, dated July 27, 2020.

Scope of the Evaluation

Evaluation Period/Products Evaluated

PNB 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. The evaluation period is January 1, 2020, through December 31, 2021.

For the lending test, the OCC evaluated home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA) and small loans to businesses and farms reported under CRA. For each AA, the OCC determined the bank's primary products and evaluated only those products. Primary loan products, for purposes of this review, are products in which the bank originated at least 20 loans within an AA. HMDA and small business loans are considered primary products in all AAs, as there is sufficient volume to consider these categories as primary products. The following AAs did not have sufficient farm loans to warrant consideration as a primary product: Jefferson County, KY MSA, Asheville, NC MSA, Charlotte, NC MSA, Cincinnati, OH MSA, Greenville, SC MSA, and Spartanburg, SC MSA. All other AAs had sufficient small farm loans to warrant consideration as a primary product.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AA(s) within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated 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.

The state of Ohio carried the greatest weight in the overall conclusions. As of June 30, 2021, this state accounts for 89.8 percent of deposits and 90.4 percent of branches. During the evaluation period, the bank originated 78.4 percent of loans by number and 70.4 percent by dollar volume in the state of Ohio.

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

Other Loan Performance

PNB makes extensive use of flexible and/or innovative lending products. Throughout the evaluation period, the bank made 550 flexible/innovative loans totaling \$81.9 million, not including PPP loans. This total rises to 8,265 loans, totaling \$850.3 million, when PPP loans are considered. The bank offers government-guaranteed loan products including Federal Housing Administration (FHA), USDA Rural Development, Veterans Administration (VA), and Small Business Administration (SBA) loans. These loans are included in the totals for home mortgage loans and small loans to businesses.

Additional lending programs were considered and had a positive impact on the bank’s overall lending performance. PNB used proprietary home mortgage and home improvement loan products to meet the affordable housing needs in low-income geographies for LMI individuals or families. The bank also participates in other flexible mortgage lending programs benefitting underserved markets and/or LMI individuals or families in several states.

PNB works in conjunction with state housing agencies and city or county programs to offer affordable products to first time and other qualified homebuyers. These programs may include closing cost and down payment assistance. PNB has worked with the Ohio Housing Finance Agency and the Fairfield Economic Development Administration’s (EDA) Revolving Loan Fund (RLF) to offer flexible, affordable loan products under each of the agency’s respective programs.

The following is a description of some of the flexible loan products the bank offers throughout the various rating areas.

Fairfield EDA RLF

The Fairfield RLF is a program offered by Fairfield County, similar to an SBA 504 loan. The program targets private, for-profit businesses in manufacturing, agribusiness, wholesale service, and/or retail, with less than 200 employees. Projects must be located in Fairfield County, OH. The RLF waives closing costs and loan or processing fees. One full-time equivalent job must be created or retained for every \$25,000 of RLF financing. The jobs must be created within two years after project completion and 51 percent of the jobs created must be made available to LMI individuals. Over the course of the evaluation period, PNB originated one RLF loan totaling \$281,250 in the bank's Columbus, OH AA.

Farm Service Agency (FSA) Beginning Farm Real Estate Loan

The purpose of this program is to provide financing to beginner farmers who are unable to obtain traditional financing from commercial lenders. With FSA Beginning Farm Real Estate Loans, borrowers can purchase farmland through the FSA down payment program, joint financing agreement, or land contract guarantee. The FSA advertises inventory property and eligible farmers are given priority to purchase these properties at the appraised value. Over the course of the evaluation period, PNB originated two of these FSA loans totaling \$136,285 within the bank's AAs.

Federal Home Loan Bank of Cincinnati (FHLBC) Welcome Home Grant

The Welcome Home Grant is a \$5,000 grant from the FHLBC to create more opportunities for LMI borrowers. Borrowers earning at or below 80 percent of the median family income for the county in which the property is located are eligible for the grant (total income of all occupants in the home). The grant may be used to fund reasonable down payment and closing costs. The borrower is restricted to a five-year retention period or may be required to pay back a pro-rated amount of the grant. Homebuyers must contribute \$500 of their own funds. Over the course of the evaluation period, PNB originated 66 loans with Welcome Home grants totaling \$5.9 million within the bank's AAs, and two loans with Welcome Home grants totaling \$402,972 outside of the bank's AAs.

Home Sweet Home (HSM) Program

These proprietary home loan programs target financing for improvements or purchases of properties located in low-income geographic areas. Borrowers with income below 80 percent of the area median income are eligible for the program.

Home Improvement – Closing costs are limited to \$199. The product also allows up to a 49 percent debt to income ratio as long as the borrower can demonstrate the ability to repay the loan. Over the course of the evaluation period, PNB originated eight HSM Home Improvement loans totaling \$85,329 within the bank's AAs.

Home Purchase – This is a pilot program for first responders (i.e. police officers, firefighters, EMTs, paramedics, nurses, and physicians), teachers, administrators, counselors, veterans, reservists, or active duty military members (including surviving spouses). The product has a minimum 3 percent down payment requirement and waives mortgage insurance. Over the course of the evaluation period, PNB originated six HSM Home Mortgage loans totaling \$951,229 within the bank's AAs.

Ohio Housing Finance Agency (OHFA)

The OHFA is the leader in affordable housing in the state of Ohio, offering a variety of programs to help first-time homebuyers, renters, senior citizens, and others find quality affordable housing. This includes,

but is not limited to, down payment assistance, interest rate discounts, revitalization programs, and first-time homebuyer programs. OHFA programs are also often paired with FHA, VA, or USDA loans. Additionally, the OHFA has a bond program that provides lower cost financing for the acquisition, construction, and rehabilitation of multifamily housing and single-family housing for LMI residents through the issuance of tax-exempt mortgage revenue bonds. Over the course of the evaluation period, PNB originated 61 OHFA loans totaling \$7.3 million within the bank's AAs, and three OHFA loans totaling \$362,056 outside of the bank's AAs.

Paycheck Protection Program (PPP)

The bank made use of responsive flexible lending during the pandemic in 2020 and 2021 by originating loans to stabilize small businesses and communities through the SBA PPP. During the evaluation period, the bank originated 7,035 PPP loans totaling \$671.6 million within the bank's AAs, and 680 PPP loans totaling \$96.9 million outside the bank's AAs. This activity received positive consideration, as it provided stabilization of small businesses and communities.

USDA Rural Housing Loans

The purpose of the program is primarily to help LMI individuals or households purchase homes in rural areas. With USDA Rural Housing Loans, LMI borrowers qualify for a reduced down payment and financing up to the sales price. The transaction is structured to provide a fixed-rate first mortgage for a term of 30 years. This product has income restrictions. Over the course of the evaluation period, PNB originated 16 USDA loans totaling \$2.1 million within the bank's AAs, and two USDA loans totaling \$354,544 outside of the bank's AAs.

Veterans Administration (VA) Mortgage Loans

VA Mortgages Loans are guaranteed by the VA for qualified military veterans. There is no down payment if the property appraises for the sale price or greater, and there are no monthly mortgage insurance payments. Credit underwriting is flexible. Over the course of the evaluation period, PNB originated 40 VA loans totaling \$7.7 million within the bank's AAs, and three VA loans totaling \$891,864 outside of the bank's AAs.

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 Bureau of Consumer Financial Protection, as applicable.

The OCC identified the following public information regarding non-compliance with the statutes and regulations prohibiting discriminatory or other illegal credit practices with respect to this institution:

- The Park National Bank (PNB) entered into a voluntary Consent Order with the Department of Justice (DOJ) on February 27, 2023.
- The DOJ alleges that PNB engaged in illegal redlining by avoiding providing home loans and other mortgage services in majority-Black and Hispanic census tracts in its assessment area under the Community Reinvestment Act located within the Columbus, Ohio Metropolitan Statistical Area.
- There have been no factual findings or adjudication in this case.
- The Parties entered into this Consent Order to voluntarily resolve all claims arising from the conduct alleged in the Complaint.

The CRA performance rating was not lowered as a result of these findings. The OCC considered the nature, extent, and strength of the evidence of the practices; the extent to which the institution had policies and procedures in place to prevent the practices; the extent to which the institution has taken or has committed to take corrective action, including voluntary corrective action resulting from self-assessment; and other relevant information.

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

State Rating

State of Kentucky

CRA rating for the State of Kentucky¹: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect good responsiveness to AA credit needs.
- Poor geographic and borrower distribution of loans.
- Outstanding level of qualified CD investments and grants.
- Service delivery systems are reasonably accessible.
- Adequate level of CD services.

Description of Institution's Operations in Kentucky

PNB has one AA within the state of Kentucky, the Louisville MSA.

The state of Kentucky represents the smallest rated area by deposits. PNB has \$14.8 million in deposits in the state, representing 0.2 percent of bank wide deposits. The bank made 0.2 percent of loans by number and 0.4 percent of loans by dollar volume in the state of Kentucky.

Louisville MSA

The Louisville MSA consists of 191 census tracts (CTs) and encompasses the entirety of Jefferson County, KY. Park has one branch location and no ATM locations in the AA. According to the FFIEC Census Report, there are 31 low-income CTs, 44 moderate-income CTs, 57 middle-income CTs, 57 upper-income CTs, and two CTs that have not been assigned an income classification. The AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income CTs.

¹ [This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.]

Table A – Demographic Information of the Assessment Area						
Assessment Area: Louisville KY MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	191	16.2	23.0	29.8	29.8	1.0
Population by Geography	755,809	12.5	21.2	34.1	31.7	0.5
Housing Units by Geography	340,132	12.9	22.2	33.8	30.5	0.6
Owner-Occupied Units by Geography	189,914	6.0	17.8	36.8	39.2	0.1
Occupied Rental Units by Geography	117,001	20.5	28.0	30.7	19.6	1.2
Vacant Units by Geography	33,217	25.4	26.2	27.3	19.3	1.8
Businesses by Geography	86,504	9.2	16.4	28.0	41.9	4.5
Farms by Geography	1,751	6.2	13.4	33.5	45.4	1.4
Family Distribution by Income Level	185,758	23.0	17.5	19.1	40.4	0.0
Household Distribution by Income Level	306,915	26.3	16.3	17.6	39.8	0.0
Median Family Income MSA - 31140 Louisville/Jefferson County, KY-IN MSA		\$64,965	Median Housing Value			\$162,334
			Median Gross Rent			\$748
			Families Below Poverty Level			11.8%
<i>Source: 2015 ACS and 2021 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>						

Competition

Competition for deposits in the Louisville MSA is strong. As of June 30, 2021, Park's deposits in the AA total \$14.8 million, or 0.1 percent of total market share. According to the FDIC Deposit Market Share Report, Park ranks 23rd out of 26 deposit-taking institutions in the AA. The top five institutions for deposit market share in the AA are PNC, JPMorgan Chase, Fifth Third, Republic Bank & Trust Company, and Stock Yards Bank & Trust Company. These five institutions account for 78.2 percent of deposit market share. Competition for lending is also strong. Based on 2021 peer mortgage data, 449 lenders originated or purchased residential real estate loans in the AA. Park ranks 187th, with 0.02 percent of the market share, by number of loans originated. The top five lenders are Rocket Mortgage, United Wholesale Mortgage, Republic Bank & Trust, Home Point Financial Corporation, and Fifth Third. These lenders account for 23.1 percent of market share by number of loans originated. Based on 2021 peer small business loan data, 130 lenders originated or purchased small business loans in the AA. The top five small business lenders are American Express, JPMorgan Chase, Stock Yards Bank & Trust, Republic Bank & Trust, and US Bank. These lenders account for 54.7 percent of market share by number of loans originated. Park accounts for 0.1 percent of market share and ranks 53rd.

Employment and Economic Factors

Information from the December 2022 Moody's Analytics Report indicates the Louisville MSA has a reasonably diversified economy. The leading industries, based on percentage of total employment, include restaurants, local government, and hospitals. The top five employers are United Parcel Service (UPS), Norton Healthcare, UofL Health, Inc., Ford Motor Company, and Humana, Inc. According to the Bureau of Labor Statistics, the average annual unemployment rate for Jefferson County improved during the review period. The average annual unemployment rate decreased from 6.5 percent in 2020 to 4.3

percent in 2021. According to 2015 ACS US Census Data, the total population in the AA is 755,809 with 11.8 percent of families living below the poverty level. Low-income families represent 23 percent of all families in the AA and moderate-income families represent 17.5 percent of all families. Approximately 74.5 percent of households earn a wage or salary, 30.1 percent collect social security, 3 percent receive public assistance, and 18.9 percent receive retirement income.

Housing Characteristics and Affordability

According to the 2015 ASC US Census Data, 55.8 percent of housing units in the AA are owner occupied, 34.4 percent are renter occupied, and 9.8 percent are vacant. In low-income CTs in the AA, 26 percent of housing units are owner-occupied, 54.7 percent are renter occupied, and 19.2 percent are vacant. In moderate-income CTs, 45 percent of houses are owner-occupied, 43.5 percent are renter occupied, and 11.6 percent are vacant. The median age of the housing stock in the AA is 54 years and the median housing value is \$162,334.

The cost of home ownership may be a challenge for some LMI families. Assuming a 30-year mortgage with a six percent interest rate, and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$32,483 per year (or less than 50 percent of the 2021 FFIEC AMFI in the AA) could afford a \$135,445 mortgage with a payment of \$812 per month. A moderate-income borrower making \$51,972 per year (or less than 80 percent of the 2021 FFIEC AMFI in the AA) could afford a \$216,712 mortgage with a payment of \$1,299 per month. This illustrates that low-income borrowers may be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$973 when also considering down payment requirements, other owner costs, and additional monthly expenses.

Community Contact

One community contact was performed via a listening session with eleven community organizations focused on community development in Jefferson County. The participating organizations noted that challenges currently facing the community include a large number of vacant and abandoned properties, sharp appreciation in home values, rising utility costs, and a need for continued education around affordable and workforce housing. The contacts also noted there is a need for additional small business support and home improvement/home equity loans for low-income borrowers in the AA. Investments in Low-Income Housing Tax Credits are needed within the community as well.

Scope of Evaluation in Kentucky

In the state of Kentucky, the Louisville MSA received a full-scope review, as it is the only AA in the state. Home mortgage and small business loans received equal weight in the analysis, as the number and dollar volume of loans for each product was similar. The bank did not make any small farm loans in the AA during the evaluation period; therefore, an evaluation of this product would not be meaningful.

Refer to Appendix A: Scope of Evaluation for information on all AAs under review.

Conclusions in Respect to Performance Tests in Kentucky

Lending Test

The bank's performance under the Lending Test in Kentucky is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Louisville MSA	24	30	0	0	54	100.0	100.0

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

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State*	%State Deposits
Louisville MSA	\$6,096	\$6,527	\$0	\$0	\$12,623	100.0	100.0

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

While lending levels are low, competition and other factors beyond the control of the bank, such as the pandemic, led to low lending levels. The bank opened this branch in June 2019 and did not have sufficient time to increase the customer base in the area prior to the start of the pandemic. Other issues outside of the bank's control also limited marketing opportunities in this AA. Given the strong competition, as noted above in the competition section, and these other factors, the bank's lending activity is good.

Distribution of Loans by Income Level of the Geography

The bank exhibits a poor geographic distribution of loans in its AA.

Home Mortgage Loans

The geographic distribution of home mortgage loans is poor. The percentage of home mortgage loans in low-income geographies is well below the percentage of owner-occupied housing and aggregate distribution of loans in those geographies. The proportion of loans to moderate-income geographies is below the percentage of owner-occupied housing and aggregate distribution of loans in those geographies.

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

Small Loans to Businesses

The geographic distribution of small loans to businesses is poor. The percentage of small loans to businesses in low-income geographies is below the percentage of businesses and aggregate distribution of loans in those geographies. The percentage of small loans to businesses in moderate-income

geographies is significantly below the percentage of businesses and aggregate distribution of loans in those geographies.

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

Small Loans to Farms

The bank did not originate a sufficient volume of loans to conduct a meaningful analysis on small loans to farms.

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

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. The OCC reviewed summary reports, maps, and analyzed the bank's lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. The OCC did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a poor distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution. The borrower distribution of small loans to businesses is good but the borrower distribution of home mortgages is very poor.

Home Mortgage Loans

The borrower distribution of home mortgage loans is very poor. The percentage of loans to low-income borrowers is significantly below the percentage of low-income families in the AA and aggregate lending. The percentage of loans to moderate-income borrowers is well below the percentage of moderate-income families in the AA and aggregate lending.

Refer to Table P in the state of Kentucky Section of appendix D 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

The borrower distribution of small loans to businesses is good. The proportion of bank loans to businesses with revenues less than \$1 million, considering only those that reported revenue, was close to the percentage of small businesses in the AA. Bank loans to businesses with revenues less than \$1 million is below aggregate lending but is reasonable considering the large proportion of bank loans to businesses that did not report revenues, largely due to PPP lending.

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

Small Loans to Farms

The bank did not originate a sufficient volume of loans to conduct a meaningful analysis on small loans to farms.

Refer to Table T in the state of Kentucky section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Community Development Lending

The institution has made few, if any, CD loans in the AA. This had a neutral impact on the Lending Test in the state of Kentucky.

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

PNB did not make any CD loans in the AA during the evaluation period. This had a neutral impact on the Lending Test rating in Kentucky, given the bank's limited presence in the AA, the limited time they were in the AA prior to the pandemic, and the fact that the bank made PPP loans in the area that did not receive credit under the small loans to businesses lending area due to the lack of income information.

Product Innovation and Flexibility

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

Refer to the Other Loan Performance section under the Scope of the Evaluation section at the beginning of this evaluation for additional details regarding other programs.

Investment Test

The bank's performance under the Investment Test in Kentucky is rated outstanding.

Conclusions for Area Receiving a Full-Scope Review

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

The bank made an outstanding level of qualified CD investments and donations. The bank demonstrates reasonable responsiveness to credit and community economic development needs. The bank does not use innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Louisville MSA	0	0	7	1,020	7	100.0	1,020	100.0	0	0

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

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

PNB made seven qualified CD investments and donations, totaling \$1 million or 71 percent of allocated tier 1 capital. During the evaluation period, PNB made five qualified donations to five organizations, totaling \$19,500. In addition to this, the bank pledged \$1. million, in two investments, to respond to the AA's need for affordable housing, aiding in the creation or rehabilitation of 185 affordable housing units.

Service Test

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

Conclusions for the Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Louisville MSA	1	100.0	100.0	0.0	0.0	0.0	0.0	16.2	23.0	29.8	29.8

PNB has one branch location within the Louisville MSA AA. This branch location was opened in June 2019. The branch is located in a CT with an unknown income level, located in the downtown area of Louisville, KY. There are no ATMs in the AA.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Branch Openings/Closings			
			Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Louisville MSA	0	0	0	0	0	0

The bank's record in opening and closing branches has not adversely affected the accessibility of its delivery systems. The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and/or individuals. Banking hours and services offered are comparable without differences between income levels.

Community Development Services

The bank provides an adequate level of CD services. Within the AA, two employees provided CD services to two different organizations. Both employees demonstrated leadership by serving on the board or committee of an organization. The services performed focused on organizations providing community services to LMI individuals and families. While the number of services is low, consideration was given to the bank entering the Louisville MSA AA in late 2019, with the start of the COVID-19 pandemic in early 2020 significantly reducing the bank's opportunities to provide service in the AA.

State Rating

State of North Carolina

CRA rating for the State of North Carolina²: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs.
- Good geographic distribution and a poor borrower distribution of loans.
- Outstanding level of qualified CD investments and grants.
- Service delivery systems are reasonably accessible.
- Relatively high level of CD services.

Description of Institution's Operations in North Carolina

PNB has two AAs within the state of North Carolina, the Asheville MSA and the Charlotte MSA. All counties with the bank AAs in the state of North Carolina were considered underserved banking deserts, Buncombe and Henderson Counties in the Asheville MSA and Mecklenburg County in the Charlotte MSA.

The state of North Carolina represents the second smallest rated area by deposits. PNB has \$340.6 million in deposits in the state, representing 4 percent of bank wide deposits. The bank made 4.3 percent of loans by number and 7.5 percent of loans by dollar volume in the state of North Carolina.

Asheville, NC MSA

The Asheville MSA consists of 83 CTs and encompasses both Buncombe and Henderson Counties. Park has two branch locations and two ATM locations in the AA. According to the FFIEC Census Report, there are two low-income CTs, 11 moderate-income CTs, 49 middle-income CTs, 20 upper-income CTs, and one CT that has not been assigned an income classification. The AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income CTs.

² [This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.]

Table A – Demographic Information of the Assessment Area						
Assessment Area: Asheville NC MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	83	2.4	13.3	59.0	24.1	1.2
Population by Geography	357,055	1.9	12.0	63.4	22.7	0.0
Housing Units by Geography	170,625	2.4	11.8	62.4	23.4	0.0
Owner-Occupied Units by Geography	98,080	1.6	9.4	63.8	25.1	0.0
Occupied Rental Units by Geography	49,859	3.6	17.0	58.7	20.7	0.0
Vacant Units by Geography	22,686	3.1	10.8	64.7	21.4	0.0
Businesses by Geography	43,290	3.3	14.1	52.2	30.4	0.0
Farms by Geography	1,435	1.5	11.8	65.2	21.5	0.0
Family Distribution by Income Level	90,279	19.4	18.4	20.5	41.7	0.0
Household Distribution by Income Level	147,939	22.6	16.2	18.7	42.4	0.0
Median Family Income MSA - 11700 Asheville, NC MSA		\$57,243	Median Housing Value			\$199,756
			Median Gross Rent			\$807
			Families Below Poverty Level			10.6%
<i>Source: 2015 ACS and 2021 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>						

Competition

Competition for deposits in the Asheville MSA is strong. As of June 30, 2021, Park's deposits in the AA total \$126.7 million, or 1.3 percent of total market share. According to the FDIC Deposit Market Share Report, Park ranks 11th out of 19 deposit-taking institutions in the AA. The top five institutions, for deposit market share in the AA, are First Citizens, Wells Fargo, Truist, Bank of America, and First Bank of NC. These five institutions account for 74.2 percent of deposit market share. Competition for lending is also strong. Based on 2021 peer mortgage data, 521 lenders originated or purchased residential real estate loans in the AA. Park ranks 48th, with 0.5 percent of market share, by number of loans originated. The top five lenders are the State Employees Credit Union, Rocket Mortgage, Movement Mortgage, HomeTrust Bank, and Wells Fargo. These lenders account for 28.2 percent of market share by number of loans originated. Based on 2021 peer small business loan data, 129 lenders originated or purchased small business loans in the AA. The top five small business lenders are American Express, First Citizen's Bank & Trust, Bank of America, Wells Fargo, and Truist. These lenders account for 50.5 percent of market share by number of loans originated. Park accounts for 1 percent of market share and ranks 21st.

Employment and Economic Factors

Information from the December 2022 Moody's Analytics Report indicates the Asheville MSA has a moderately diversified economy. The leading industries, based on percentage of total employment include restaurants, local government, and hospitals. The top five employers are Ingles Markets, Walmart, Mission Health Hospital, Biltmore Workforce Management, and the Veterans Administration (VA). According to the Bureau of Labor Statistics, the average annual unemployment rate for the AA improved during the review period. The average annual unemployment rate decreased from 7.7 percent

in 2020 to 4.2 percent in 2021. According to 2015 ACS US Census Data, the total population in the AA is 357,055 with 10.6 percent of families living below the poverty level. Low-income families represent 19.4 percent of all families in the AA and moderate-income families represent 18.4 percent of all families. Approximately 68.2 percent of households earn a wage or salary, 36.7 percent collect social security, 1.9 percent receive public assistance, and 23.5 percent receive retirement income.

Housing Characteristics and Affordability

According to the 2015 ASC US Census Data, 57.5 percent of housing units in the AA are owner occupied, 29.2 percent are renter occupied, and 13.3 percent are vacant. In low-income CTs in the AA, 39.2 percent of housing units are owner-occupied, 43.9 percent are renter occupied, and 16.9 percent are vacant. In moderate-income CTs, 45.9 percent of houses are owner-occupied, 42 percent are renter occupied, and 12.1 percent are vacant. The median age of the housing stock in the AA is 39 years and the median housing value is \$199,756.

The cost of home ownership may be a challenge for many LMI families. Assuming a 30-year mortgage with a 6 percent interest rate, and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$28,622 per year (or less than 50 percent of the 2021 FFIEC AMFI in the AA) could afford a \$119,346 mortgage with a payment of \$716 per month. A moderate-income borrower making \$45,794 per year (or less than 80 percent of the 2021 FFIEC AMFI in the AA) could afford a \$190,953 mortgage with a payment of \$1,145 per month. This illustrates that both low- and moderate-income borrowers may be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$1,198 when also considering down payment requirements, other owner costs, and additional monthly expenses.

Community Contact

One community contact was performed with an organization that provides economic development resources to the local community. The contact stated that, in general, banks do a good job of volunteering on the boards of local nonprofit organizations by providing their financial expertise. A noted challenge currently facing the community is a shortage of LMI affordable housing due to a recent influx of residents. Additionally, the organization reported a lack of services dedicated to the homeless and no comprehensive approach for managing the homeless population. The area's bus system is not well connected to other city and county bus systems, which is also a challenge in the community.

Scope of Evaluation in North Carolina

In the state of North Carolina, the Asheville MSA AA received a full-scope review, and the Charlotte MSA AA received a limited-scope review. While the Charlotte MSA accounts for more deposits in the state, representing 62.8 percent of the state's deposits, this MSA received a full-scope review during the last evaluation. Lending volumes in both AAs were similar during the review period, with Asheville accounting for 53.5 percent of loans by number and 53.9 percent of loans by dollar volume. Charlotte accounts for 46.5 percent of loans by number and 46.1 percent of loans by dollar volume.

Home mortgage and small business loans will receive equal weight in the analysis in the Asheville MSA AA, as the number and dollar volume of loans for each product was similar. In the Charlotte MSA AA, small business loans will receive more weight than home mortgage loans, as small business loans represent 72 percent of the loans in this AA. The bank did not make a sufficient volume of small farm loans in either AA during the evaluation period for a meaningful review.

Refer to Appendix A: Scope of Evaluation for information on all AAs under review.

Conclusions in Respect to Performance Tests in North Carolina

Lending Test

The bank's performance under the Lending Test in North Carolina is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Asheville MSA	275	287	3	0	565	53.1	37.2
Charlotte MSA	138	354	0	7	499	46.9	62.8

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

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Asheville MSA	\$89,082	\$53,416	\$296	\$0	\$142,794	53.7	37.2
Charlotte MSA	\$60,577	\$61,741	\$0	\$1,015	\$123,333	46.3	62.8

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

As noted above in the competition section, competition in the AA is strong for loans. While there are only 19 deposit taking institutions in the AA, there are 449 home mortgage lenders and 133 small business lenders in the AA. The bank ranks 48th for home mortgage loans and 21st for small business loans, which is excellent given the bank's small deposit market share.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

The geographic distribution of home mortgage loans is adequate. The percentage of home mortgage loans in low-income geographies is close to the percentage of owner-occupied housing and aggregate distribution of loans in those geographies. The proportion of loans to moderate-income geographies is

somewhat close to the percentage of owner-occupied housing and aggregate distribution of loans in those geographies.

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

Small Loans to Businesses

The geographic distribution of small loans to businesses is excellent. The percentage of small loans to businesses in low-income geographies exceeds the percentage of businesses and aggregate distribution of loans in those geographies. The percentage of small loans to businesses in moderate-income geographies also exceeds the percentage of businesses and aggregate distribution of loans in those geographies.

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

Small Loans to Farms

The bank did not originate a sufficient volume of loans to conduct a meaningful analysis on small loans to farms.

Refer to Table S in the state of North Carolina section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. The OCC reviewed summary reports, maps, and analyzed the bank's lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. The OCC did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

The borrower distribution of home mortgage loans is poor. The percentage of loans to low-income borrowers is significantly below the percentage of low-income families in the AA and below aggregate lending. The percentage of loans to moderate-income borrowers is well below the percentage of moderate-income families in the AA and aggregate lending.

Refer to Table P in the state of North Carolina section of appendix D 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

The borrower distribution of small loans to businesses is poor. The proportion of bank loans to businesses with revenues less than \$1 million, considering only those that reported revenue, was significantly below the percentage of small businesses in the AA. The proportion of bank loans to businesses with revenues less than \$1 million is below aggregate lending but does not consider the large portion of bank loans to businesses that did not report revenues.

Refer to Table R in the state of North Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Small Loans to Farms

The bank did not originate a sufficient volume of loans to conduct a meaningful analysis on small loans to farms.

Refer to Table T in the state of North Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Community Development Lending

The institution has made few, if any, CD loans. This had a neutral impact on the bank's Lending Test rating in the state of North Carolina.

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

PNB did not make any CD loans in the AA during the evaluation period. This had a neutral impact on the Lending Test rating in North Carolina. The bank made nearly 300 small loans to businesses during the evaluation period, of which approximately half were PPP loans that benefited various businesses in the AA but did not receive credit under the borrower distribution due to the lack of revenue information.

Product Innovation and Flexibility

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

Refer to the Other Loan Performance section under the Scope of the Evaluation section at the beginning of this evaluation for additional details regarding other programs.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Charlotte MSA AA is consistent with the bank's overall performance under the Lending Test in the full-scope area.

Refer to Tables O through V in the state of North Carolina section of appendix D for the facts and data that support these conclusions.

Investment Test

The bank's performance under the Investment Test in North Carolina is rated Outstanding.

Conclusions for the Area Receiving a Full-Scope Review

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

The bank made an outstanding level of qualified CD investments and grants. The bank exhibits adequate responsiveness to credit and community economic development needs. The bank does not use innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Asheville MSA	2	631	10	828	12	66.7	1,459	30.3	0	0
Charlotte MSA	1	353	5	3,006	6	33.3	3,359	69.7	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.*

PNB made 12 qualified CD investments and donations, totaling \$1.5 million, or 11.8 percent of allocated tier 1 capital. During the current period, PNB made nine qualified donations to five organizations, totaling \$48,700. Additionally, PNB invested in a qualified mortgaged-backed security (MBS), where the majority of the underlying loans are to LMI borrowers, totaling \$779,442. The bank also received credit for two MBS investments during the prior period, totaling \$630,885.

Conclusion for Area Receiving a Limited-Scope Review

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

Service Test

The bank's performance under the Service Test in North Carolina is rated High Satisfactory.

Conclusions for the Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Asheville MSA	37.2	2.00	66.7	0.0	50.0	0.00	50.0	2.4	13.3	59.0	24.1
Charlotte MSA	62.8	1.00	33.3	0.0	0.0	0.00	100.0	12.5	21.5	22.3	42.1

PNB has two branch locations in the Asheville MSA AA. One branch is located in a moderate-income CT and the other is in an upper-income CT. Both branch locations have full-service ATMs. There are no standalone ATMs in the Asheville MSA AA.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
			Asheville MSA	0	0	0
Charlotte MSA	0	1	0	0	0	-1

The bank's record in opening and closing branches has not adversely affected the accessibility of its delivery systems. There were no opened or closed branches in the AA during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and/or individuals. Banking hours and services offered are comparable without differences between income levels.

Community Development Services

The bank provides a relatively high level of CD services in the Asheville MSA AA.

Within the AA, five employees served in four organizations, with board or committee involvement in all the organizations. The services performed focused on organizations providing services to LMI individuals and families. In addition to this, employees volunteered in affordable housing projects to reduce costs and provide housing to lower income families.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited-scope reviews, the bank's performance under the Service Test in the Charlotte MSA AA is consistent with the bank's overall performance under the Service Test in the full-scope area.

State Rating

State of Ohio

CRA rating for the State of Ohio³: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs.
- Adequate geographic distribution of loans.
- Good borrower distribution of loans.
- The institution is a leader in making CD loans.
- Good level of qualified investments.
- Service delivery systems are reasonably accessible.
- The bank is a leader in providing CD services.

Description of Institution's Operations in Ohio

PNB has six AAs within the state of Ohio, the Cincinnati MSA, Columbus MSA, Dayton MSA, Mansfield MSA, OH non-MSA, and the Springfield MSA. Seven counties in the bank's AAs within the state of Ohio are underserved banking deserts and two are distressed or underserved. Franklin and Licking Counties, in the Columbus MSA, Athens, Guernsey, Knox, and Muskingum Counties, in the OH non-MSA, and Clark County, in the Springfield MSA, are all underserved banking deserts. Athens and Coshocton Counties in the OH non-MSA are distressed or underserved.

The state of Ohio represents the largest rated area by deposits. PNB has \$7.6 billion in deposits in the state, representing 89.8 percent of bank wide deposits. The bank made 86.8 percent of loans by number and 81.2 percent of loans by dollar volume in the state of Ohio.

³ [This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.]

Cincinnati MSA

The Cincinnati MSA AA changed between 2020 and 2021. On September 30, 2020, the West Chester Office (located in Butler County in an Upper income tract) was closed. The closure of the West Chester Office resulted in the removal of Butler County from this AA for 2021. Additionally, on September 30, 2020, the Springboro Office (located in Warren County in an Upper income tract) was closed. The closure of the Springboro Office resulted in the removal of Warren County from this AA for 2021.

Currently, the Cincinnati MSA AA consists of 262 census tracts (CTs) and encompasses both Clermont and Hamilton Counties. Park has five branch locations and four ATM locations in the AA. According to the FFIEC Census Report, there are 41 low-income CTs, 63 moderate-income CTs, 85 middle-income CTs, 69 upper-income CTs, and four CTs that have not been assigned an income classification. The AA meets the requirements of the regulation and does not arbitrarily exclude any LMI CTs.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Cincinnati OH MSA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	262	15.6	24.0	32.4	26.3	1.5
Population by Geography	1,004,479	11.1	21.3	36.5	30.4	0.7
Housing Units by Geography	458,794	13.4	22.4	35.9	27.9	0.4
Owner-Occupied Units by Geography	248,283	4.8	17.7	39.9	37.5	0.1
Occupied Rental Units by Geography	158,167	22.1	28.9	31.5	16.8	0.6
Vacant Units by Geography	52,344	28.4	24.8	29.5	16.2	1.0
Businesses by Geography	76,768	7.4	21.1	31.2	38.9	1.4
Farms by Geography	1,823	4.2	17.4	42.8	35.3	0.2
Family Distribution by Income Level	247,283	25.3	16.0	18.8	40.0	0.0
Household Distribution by Income Level	406,450	29.0	15.6	16.1	39.4	0.0
Median Family Income MSA - 17140 Cincinnati, OH-KY-IN MSA		\$69,949	Median Housing Value			\$157,371
			Median Gross Rent			\$728
			Families Below Poverty Level			12.4%
<i>Source: 2015 ACS and 2021 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>						

Competition

Competition for deposits in the Cincinnati MSA is strong. As of June 30, 2021, Park's deposits in the AA total \$331.7 million, or 0.3 percent of total market share. According to the FDIC Deposit Market Share Report, Park ranks 13th out of 41 deposit-taking institutions in the AA. The top five institutions, for deposit market share in the AA, are US Bank, Fifth Third, PNC, Huntington, and First Financial. These five institutions account for 92.3 percent of deposit market share. Competition for lending is also strong. Based on 2021 peer mortgage data, 512 lenders originated or purchased residential real estate loans in the AA. Park ranks 40th, with 0.6 percent of market share, by number of loans originated. The top five lenders are Union Savings Bank, Fifth Third, US Bank, Guardian Savings, and Rocket

Mortgage. These lenders account for 28.8 percent of market share by number of loans originated. Based on 2021 peer small business loan data, 145 lenders originated or purchased small business loans in the AA. The top five small business lenders are American Express, US Bank, JPMorgan Chase, Fifth Third, and PNC. These lenders account for 57 percent of market share by number of loans originated. Park accounts for 0.9 percent of market share and ranks 19th.

Employment and Economic Factors

Information from the October 2022 Moody's Analytics Report indicates the Cincinnati MSA has a reasonably diversified economy. The leading industries based on percentage of total employment include local government, restaurants, hospitals, and management. The top five employers are Kroger, Cincinnati Children's Hospital Medical Center, TriHealth Inc., St. Elizabeth Healthcare, and the University of Cincinnati. According to the Bureau of Labor Statistics, the average annual unemployment rate for the AA improved during the review period. The average annual unemployment rate decreased from 7.1 percent in 2020 to 4.5 percent in 2021. According to 2015 ACS US Census Data, the total population in the AA is 1,004,479 with 12.4 percent of families living below the poverty level. Low-income families represent 25.3 percent of all families in the AA and moderate-income families represent 16 percent of all families. Approximately 75.2 percent of households earn a wage or salary, 27.7 percent collect social security, 3.3 percent receive public assistance, and 17.3 percent receive retirement income.

Housing Characteristics and Affordability

According to the 2015 ASC US Census Data, 54.1 percent of housing units in the AA are owner occupied, 34.5 percent are renter occupied, and 11.4 percent are vacant. In low-income CTs in the AA, 19.2 percent of housing units are owner-occupied, 56.7 percent are renter occupied, and 24.1 percent are vacant. In moderate-income CTs, 42.8 percent of houses are owner-occupied, 44.6 percent are renter occupied, and 12.7 percent are vacant. The median age of the housing stock in the AA is 57 years and the median housing value is \$157,371.

The cost of home ownership may be a challenge for many LMI families. Assuming a 30-year mortgage with a 6 percent interest rate, and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$34,975 per year (or less than 50 percent of the 2021 FFIEC AMFI in the AA) could afford a \$145,836 mortgage with a payment of \$874 per month. A moderate-income borrower making \$55,959 per year (or less than 80 percent of the 2021 FFIEC AMFI in the AA) could afford a \$233,338 mortgage with a payment of \$1,399 per month. This illustrates that low-income borrowers may be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$944 when also considering down payment requirements, other owner costs, and additional monthly expenses.

Community Contact

Two community contacts were conducted with organizations that provide community services and affordable housing resources to the local community. The contacts noted that, in general, banks meet the needs of the community. Challenges in the community primarily consist of the need for affordable housing and down payment assistance. Additionally, credit alternatives are needed for people with low credit scores due to prior delinquencies, with alternatives being focused on recent payment performance. There is also a need in the community for small dollar mortgage products for homes under \$100,000.

Columbus MSA

The Columbus MSA AA changed between 2020 and 2021. On September 30, 2020, the Plain City Office (located in Madison County in a middle-income tract) was closed. Additionally, as a result of the

branch closing, a gas station cash-dispensing only ATM located in Madison County was closed. The closure of the Plain City Office resulted in the removal of Madison County from this AA for 2021.

Currently, the Columbus MSA consists of 357 CTs and encompasses five different counties; Fairfield County, Franklin County, Hocking County, Licking County, and Perry County. Park has 20 branch locations and 32 ATM locations in the AA. According to the FFIEC Census Report, there are 66 low-income CTs, 97 moderate-income CTs, 102 middle-income CTs, 89 upper-income CTs, and three CTs that have not been assigned an income classification. The AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income CTs.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Columbus OH MSA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	363	18.2	26.7	29.8	24.5	0.8
Population by Geography	1,633,501	12.2	25.0	33.3	28.8	0.8
Housing Units by Geography	708,592	13.7	25.7	32.9	27.4	0.2
Owner-Occupied Units by Geography	372,825	6.5	21.4	36.7	35.3	0.0
Occupied Rental Units by Geography	265,250	19.6	30.9	29.6	19.5	0.5
Vacant Units by Geography	70,517	29.9	28.8	25.6	15.1	0.6
Businesses by Geography	126,932	10.9	20.3	29.9	38.4	0.6
Farms by Geography	3,304	6.8	17.8	43.8	31.4	0.2
Family Distribution by Income Level	392,065	24.2	17.8	19.8	38.1	0.0
Household Distribution by Income Level	638,075	25.8	17.0	17.6	39.6	0.0
Median Family Income MSA - 18140 Columbus, OH MSA		\$70,454	Median Housing Value			\$150,883
			Median Gross Rent			\$837
			Families Below Poverty Level			11.8%
<i>Source: 2015 ACS and 2021 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>						

Competition

Competition for deposits in the Columbus MSA is strong. As of June 30, 2021, Park's deposits in the AA total \$2.8 billion, or 3.2 percent of total market share. According to the FDIC Deposit Market Share Report, Park ranks 6th out of 51 deposit-taking institutions in the AA. The top five institutions, for deposit market share in the AA, are Huntington, JPMorgan Chase, PNC, Fifth Third, and Bank of America. These five institutions account for 83.2 percent of deposit market share. Competition for lending is also strong. Based on 2021 peer mortgage data, 588 lenders originated or purchased residential real estate loans in the AA. Park ranks 13th, with 1.7 percent of market share, by number of loans originated. The top five lenders are Huntington, Rocket Mortgage, Union Savings Bank, JPMorgan Chase, and Fifth Third. These lenders account for 26.2 percent of market share by number of loans originated. Based on 2021 peer small business loan data, 172 lenders originated or purchased small business loans in the AA. The top five small business lenders are JPMorgan Chase, American Express, PNC, Huntington, and US Bank. These lenders account for 58.4 percent of market share by

number of loans originated. Park accounts for 2.7 percent of market share and ranks 11th. Based on 2021 peer small business loan data, 19 lenders originated or purchased small farm loans in the AA. The top five small farm lenders are JPMorgan Chase, Park, Huntington, John Deere Financial, and US Bank. As the second largest small farm lender in the AA, Park originated 58 loans (16.1 percent market share) for \$3.7 million (32.9 percent market share) in 2021.

Employment and Economic Factors

Information from the February 2023 Moody's Analytics Report indicates the Columbus MSA has a moderately diversified economy. The leading industries based on percentage of total employment include local government, restaurants, and state government. The top five employers are The Ohio State University, OhioHealth, JPMorgan Chase, Nationwide, and Nationwide Children's Hospital. According to the Bureau of Labor Statistics, the average annual unemployment rate for the AA improved during the review period. The average annual unemployment rate decreased from 7.2 percent in 2020 to 4.7 percent in 2021. According to 2015 ACS US Census Data, the total population in the AA is 1,633,501 with 11.8 percent of families living below the poverty level. Low-income families represent 24.2 percent of all families in the AA and moderate-income families represent 17.8 percent of all families. Approximately 78.5 percent of households earn a wage or salary, 24.2 percent collect social security, 3.1 percent receive public assistance, and 17.2 percent receive retirement income.

Housing Characteristics and Affordability

According to the 2015 ASC US Census Data, 52.6 percent of housing units in the AA are owner occupied, 37.4 percent are renter occupied, and 10 percent are vacant. In low-income CTs in the AA, 24.8 percent of housing units are owner-occupied, 53.5 percent are renter occupied, and 21.7 percent are vacant. In moderate-income CTs, 43.9 percent of houses are owner-occupied, 45 percent are renter occupied, and 11.2 percent are vacant. The median age of the housing stock in the AA is 47 years and the median housing value is \$150,883.

The cost of home ownership may be a challenge for many LMI families. Assuming a 30-year mortgage with a 6 percent interest rate, and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$35,227 per year (or less than 50 percent of the 2021 FFIEC AMFI in the AA) could afford a \$146,889 mortgage with a payment of \$881 per month. A moderate-income borrower making \$56,363 per year (or less than 80 percent of the 2021 FFIEC AMFI in the AA) could afford a \$235,023 mortgage with a payment of \$1,409 per month. This illustrates that low-income borrowers may be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$904 when also considering down payment requirements, other owner costs, and additional monthly expenses.

Community Contact

Two community contacts were performed with organizations that provide economic development resources to the local community. The contacts stated that, in general, banks do a good job of serving the credit needs of the local community. Per the community contacts, a shortage of LMI affordable housing is a challenge in the community. The supply of affordable housing is low and adversely impacted by local investors outbidding potential home buyers. One contact emphasized that housing cannot be built fast enough to meet demand and flexible financing options are needed for buyers. The elevated cost of construction materials is an additional challenge facing the development of affordable housing. Funding for low-income micro-loans to finance home repairs is also an identified need in the area.

OH non-MSA

The Ohio non-MSA assessment area consists of 200 CTs and encompasses eight different counties; Ashland County, Coshocton County, Guernsey County, Holmes County, Knox County, Muskingum County, Tuscarawas County, and Wayne County. Park has 36 branch locations and 43 ATM locations in the AA. According to the FFIEC Census Report, there are five low-income CT, 36 moderate-income CTs, 122 middle-income CTs, 33 upper-income CTs, and four CTs that have not been assigned an income classification. The AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income CTs.

Table A – Demographic Information of the Assessment Area						
Assessment Area: OH non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	200	2.5	18.0	61.0	16.5	2.0
Population by Geography	834,317	2.3	14.9	64.5	16.6	1.7
Housing Units by Geography	351,621	1.9	16.4	64.6	16.4	0.7
Owner-Occupied Units by Geography	222,500	1.0	12.7	67.7	18.5	0.1
Occupied Rental Units by Geography	93,931	3.3	23.7	57.5	13.4	2.0
Vacant Units by Geography	35,190	3.7	20.6	63.7	11.0	0.9
Businesses by Geography	46,904	1.6	15.8	63.9	17.7	1.0
Farms by Geography	4,068	0.3	4.9	69.3	25.3	0.1
Family Distribution by Income Level	215,285	20.1	18.2	22.4	39.3	0.0
Household Distribution by Income Level	316,431	23.6	16.4	18.7	41.3	0.0
Median Family Income Non-MSAs - OH		\$55,785	Median Housing Value			\$116,440
			Median Gross Rent			\$654
			Families Below Poverty Level			11.6%
<i>Source: 2015 ACS and 2021 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>						

Competition

Competition for deposits in the Ohio non-MSA is strong. As of June 30, 2021, Park's deposits in the AA total \$2.7 billion, or 14.9 percent of total market share. According to the FDIC Deposit Market Share Report, Park ranks 1st out of 60 deposit-taking institutions in the AA. The next four institutions, for deposit market share in the AA, are Huntington, PNC, JPMorgan Chase, and Commercial & Savings Bank of Millersburg. Combined with Park, these five institutions account for 45.1 percent of deposit market share. Competition for lending is also strong. Based on 2021 peer mortgage data, 435 lenders originated or purchased residential real estate loans in the AA. Park ranks 2nd, with 8.1 percent of market share, by number of loans originated. The top five lenders are Huntington, Park, Rocket Mortgage, Union Home, and US Bank. These lenders account for 31.1 percent of market share by number of loans originated. Based on 2021 peer small business loan data, 113 lenders originated or purchased small business loans in the AA. The top five small business lenders are JPMorgan Chase, American Express, Park, US Bank, and Capital One. These lenders account for 54.6 percent of market share by number of loans originated. Park accounts for 10.9 percent of market share and ranks 3rd. Based on 2021 peer small

business loan data, 32 lenders originated or purchased small farm loans in the AA. The top five small farm lenders are Park, Farmers National, John Deere Financial, US Bank, and JPMorgan Chase. As the largest small farm lender in the AA, Park originated 492 loans (32.7 percent market share) for \$19.3 million (29.7 percent market share) in 2021.

Housing Characteristics and Affordability

According to 2015 ACS US Census Data, the total population in the AA is 834,317 with 11.6 percent of families living below the poverty level. Low-income families represent 20.1 percent of all families in the AA and moderate-income families represent 18.2 percent of all families. Approximately 71.3 percent of households earn a wage or salary, 34.1 percent collect social security, 2.8 percent receive public assistance, and 22.4 percent receive retirement income. According to the 2015 ASC US Census Data, 63.3 percent of housing units in the AA are owner occupied, 26.7 percent are renter occupied, and 10 percent are vacant. In low-income CTs in the AA, 34.5 percent of housing units are owner-occupied, 46.1 percent are renter occupied, and 19.4 percent are vacant. In moderate-income CTs, 48.9 percent of houses are owner-occupied, 38.5 percent are renter occupied, and 12.6 percent are vacant. The median age of the housing stock in the AA is 54 years and the median housing value is \$116,440.

The cost of home ownership may be a challenge for many LMI families. Assuming a 30-year mortgage with a 6 percent interest rate, and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$27,893 per year (or less than 50 percent of the 2021 FFIEC AMFI in the AA) could afford a \$116,306 mortgage with a payment of \$697 per month. A moderate-income borrower making \$44,628 per year (or less than 80 percent of the 2021 FFIEC AMFI in the AA) could afford a \$186,089 mortgage with a payment of \$1,116 per month. This illustrates that low-income borrowers may be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$698 when also considering down payment requirements, other owner costs, and additional monthly expenses.

Community Contact

Three community contacts were performed with organizations that provide affordable housing and economic development resources to the local community. The contacts expressed that, in general, banks do a good job of meeting community needs but more bank involvement is needed. Educational attainment is low in the area and the high school graduation rates have become concerning to the community. The need for education, job training, and employment services is considerable. One contact noted that banks in the area are very supportive overall. The contact also stated there is a need for construction of residential housing for all income levels, as well as construction of commercial properties for small businesses. Another contact noted a need for home repair grants, construction financing for LIHTC projects, bank investments in consumer micro-loan programs, and no or low minimum balance checking accounts for youth.

Scope of Evaluation in Ohio

In the state of Ohio, the Cincinnati MSA, Columbus MSA, and the Ohio non-MSA AAs will receive full-scope reviews. The Dayton MSA, Mansfield MSA, and Springfield MSA AAs will receive limited-scope reviews. The Columbus MSA and the Ohio non-MSA AAs represent the largest rated areas in the state by deposits. They also represent the highest volume of lending. These AAs will receive equal weight in our analysis. The Cincinnati MSA AA, though the smallest rated area in the state by deposits, was selected for a full-scope because it has not been reviewed as a full-scope AA in the last two evaluations.

Home mortgage and small business loans will receive equal weight in the analysis in the Cincinnati MSA, Dayton MSA, and the Springfield MSA AAs, as the number and dollar volume of loans for each product was similar. In the Columbus MSA, Mansfield MSA, and OH non-MSA AAs, home mortgage loans will receive more weight than small business loans, as home mortgage loans represented more lending by number and dollar volume in these AAs.

The bank did not make a sufficient volume of small farm loans in the Cincinnati MSA AA during the evaluation period for a meaningful review. Small farm loans were analyzed in all other AAs in the state of Ohio, though they will receive the least weight, as the number and dollar volume of small farm loans was considerably lower than the other product types.

Refer to Appendix A: Scope of Evaluation for information on all AAs under review.

Conclusions in Respect to Performance Tests in Ohio

Lending Test

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Cincinnati MSA and OH non-MSA AAs is good. Based on a full-scope review, the bank's performance in the Columbus MSA is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Cincinnati MSA	831	594	5	4	1,434	6.7	4.4
Columbus MSA	4,108	2,439	97	27	6,671	31.3	37.4
Dayton MSA	646	611	55	4	1,316	6.2	5.9
Mansfield MSA	1,090	716	28	3	1,837	8.6	8.9
OH non-MSA	5,171	2,840	701	19	8,731	40.9	35.6
Springfield MSA	545	602	177	15	1,339	6.3	7.8

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

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Cincinnati MSA	\$190,621	\$83,417	\$197	\$3,153	\$277,388	9.4	4.4
Columbus MSA	\$734,321	\$311,680	\$7,423	\$31,388	\$1,084,812	36.9	37.4
Dayton MSA	\$100,328	\$76,264	\$2,371	\$3,740	\$182,703	6.2	5.9
Mansfield MSA	\$135,932	\$82,055	\$2,034	\$473	\$220,494	7.5	8.9
OH non-MSA	\$700,971	\$267,043	\$37,055	\$12,077	\$1,017,146	34.6	35.6
Springfield MSA	\$67,137	\$74,812	\$12,343	\$3,393	\$157,685	5.4	7.8

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

Lending levels in the Cincinnati MSA, Columbus MSA, and OH non-MSA AAs are excellent. In the Cincinnati MSA AA, loan market shares for both home mortgage and small business loans exceed the bank's deposit market share in the AA. In the Columbus MSA AA, loan market shares for both home mortgage and small business loans are close to the bank's deposit market share in the AA. The bank ranks second in loan market share for small farm loans, with 16.1 percent of small farm loans in the AA. In the OH non-MSA, the bank ranks second in market share for home mortgage loans, with 8.1 percent of home mortgage loans in the AA. In this AA, the bank ranks third for small business loans, with 10.9 percent, and first for small farm loans, with 32.7 percent of the market share.

Additional information on deposit and loan competition can be found above in the Competition sections under each full-scope AA.

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in its AAs.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects an adequate distribution.

Cincinnati MSA

The geographic distribution of home mortgage loans is adequate.

The geographic distribution of home mortgage loans in 2020 is good. The percentage of home mortgage loans in low-income geographies is below the percentage of owner-occupied housing but close to aggregate distribution of loans in those geographies. The proportion of loans in moderate-income geographies is close to the percentage of owner-occupied housing and exceeds aggregate distribution of loans in those geographies.

The geographic distribution of home mortgage loans in 2021 is adequate. The percentage of home mortgage loans in low-income geographies is well below the percentage of owner-occupied housing and aggregate distribution of loans in those geographies. The proportion of loans in moderate-income geographies is close to the percentage of owner-occupied housing and aggregate distribution of loans in those geographies.

Columbus MSA

The geographic distribution of home mortgage loans is good.

The geographic distribution of home mortgage loans in 2020 is good. The percentage of home mortgage loans in low-income geographies is below the percentage of owner-occupied housing and near to the aggregate distribution of loans in those geographies. The proportion of loans in moderate-income geographies is near to the percentage of owner-occupied housing and exceeds aggregate distribution of loans in those geographies.

The geographic distribution of home mortgage loans in 2021 is good. The percentage of home mortgage loans in low-income geographies is near to the percentage of owner-occupied housing and aggregate distribution of loans in those geographies. The proportion of loans to moderate-income geographies is near to the percentage of owner-occupied housing and aggregate distribution of loans in those geographies.

OH non-MSA

The geographic distribution of home mortgage loans is adequate. The percentage of home mortgage loans in low-income geographies is below the percentage of owner-occupied housing and near to aggregate distribution of loans in those geographies. The proportion of loans to moderate-income geographies is somewhat close to the percentage of owner-occupied housing and aggregate distribution of loans in those geographies.

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

Small Loans to Businesses

The geographic distribution of small business loans reflects an adequate distribution.

Cincinnati MSA

The geographic distribution of small loans to businesses is adequate.

The geographic distribution of small loans to businesses in 2020 is adequate. The percentage of small loans to businesses in low-income geographies is below the percentage of businesses and aggregate distribution of loans in those geographies. The percentage of small loans to businesses in moderate-income geographies is somewhat close to the percentage of businesses and aggregate distribution of loans in those geographies.

The geographic distribution of small loans to businesses in 2021 is adequate. The percentage of small loans to businesses in low-income geographies is below the percentage of businesses and aggregate distribution of loans in those geographies. The percentage of small loans to businesses in moderate-income geographies is somewhat close to the percentage of businesses and aggregate distribution of loans in those geographies.

Columbus MSA

The geographic distribution of small loans to businesses is good.

The geographic distribution of small loans to businesses in 2020 is excellent. The percentage of small loans to businesses in low-income geographies is near to the percentage of businesses and exceeds aggregate distribution of loans in those geographies. The percentage of small loans to businesses in moderate-income geographies exceeds the percentage of businesses and aggregate distribution of loans in those geographies.

The geographic distribution of small loans to businesses in 2021 is good. The percentage of small loans to businesses in low-income geographies is somewhat close to the percentage of businesses and aggregate distribution of loans in those geographies. The percentage of small loans to businesses in moderate-income geographies is close to the percentage of businesses and exceeds aggregate distribution of loans in those geographies.

OH non-MSA

The geographic distribution of small loans to businesses is adequate. The percentage of small loans to businesses in low-income geographies is below the percentage of businesses but close to aggregate distribution of loans in those geographies. The percentage of small loans to businesses in moderate-income geographies is somewhat close to the percentage of businesses and near to aggregate distribution of loans in those geographies.

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

Small Loans to Farms

The geographic distribution of small farm loans reflects a poor distribution.

Cincinnati MSA

The bank did not originate a sufficient volume of loans to conduct a meaningful analysis on small loans to farms.

Columbus MSA

The geographic distribution of small loans to farms is poor.

The geographic distribution of small loans to farms in 2020 is poor. The proportion of loans in low-income geographies is below the percentage of small farms and the aggregate distribution of loans in those geographies. The proportion of loans in moderate-income geographies is well below the percentage of small farms and the aggregate distribution of loans in those geographies.

The geographic distribution of small loans to farms in 2021 is poor. The proportion of loans in low-income geographies is below the percentage of small farms and the aggregate distribution of loans in those geographies. The proportion of loans in moderate-income geographies is well below the percentage of small farms and the aggregate distribution of loans in those geographies.

OH non-MSA

The geographic distribution of small loans to farms is poor. The bank did not make any loans in low-income geographies; however, only 0.3 percent of farms are located in low-income CTs, and aggregate lenders also did not originate any loans in these CTs. The proportion of loans in moderate-income geographies is well below the percentage of small farms and below the aggregate industry distribution of loans in those geographies.

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

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. The OCC reviewed summary reports, maps, and analyzed the bank's lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. The OCC did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

The borrower distribution of home mortgage loans reflects a good distribution.

Cincinnati MSA

The borrower distribution of home mortgage loans is good.

The borrower distribution of home mortgage loans in 2020 is adequate. The percentage of loans to low-income borrowers is below the percentage of low-income families in the AA and somewhat close to aggregate lending. The percentage of loans to moderate-income borrowers is close to the percentage of moderate-income families in the AA and aggregate lending.

The borrower distribution of home mortgage loans in 2021 is good. The percentage of loans to low-income borrowers is below the percentage of low-income families in the AA but close to aggregate lending. The percentage of loans to moderate-income borrowers is close to the percentage of moderate-income families in the AA and somewhat close to aggregate lending.

Columbus MSA

The borrower distribution of home mortgage loans is excellent.

The borrower distribution of home mortgage loans in 2020 is excellent. The percentage of loans to low-income borrowers is below the percentage of low-income families in the AA but exceeds aggregate lending. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA and exceeds aggregate lending.

The borrower distribution of home mortgage loans in 2021 is excellent. The percentage of loans to low-income borrowers is below the percentage of low-income families in the AA but exceeds aggregate lending. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA and exceeds aggregate lending.

OH non-MSA

The borrower distribution of home mortgage loans is good. The percentage of loans to low-income borrowers is below the percentage of low-income families in the AA but close to aggregate lending. The percentage of loans to moderate-income borrowers is close to the percentage of moderate-income families in the AA and aggregate lending.

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

Small Loans to Businesses

The borrower distribution of small business loans reflects an adequate distribution.

Cincinnati MSA

The borrower distribution of small business loans is adequate.

The borrower distribution of small business loans in 2020 is adequate. The proportion of bank loans to businesses with revenues less than \$1 million, considering only those that reported revenue, is close to the percentage of small businesses in the AA. Bank loans to businesses with revenues less than \$1 million is below aggregate lending.

The borrower distribution of small business loans in 2021 is adequate. The proportion of bank loans to businesses with revenues less than \$1 million, considering only those that reported revenue, is close to the percentage of small businesses in the AA. Bank loans to businesses with revenues less than \$1 million is below aggregate lending.

Columbus MSA

The borrower distribution of small business loans is adequate.

The borrower distribution of small business loans in 2020 is adequate. The proportion of bank loans to businesses with revenues less than \$1 million, considering only those that reported revenue, is somewhat close to the percentage of small businesses in the AA. Bank loans to businesses with revenues less than \$1 million is below aggregate lending.

The borrower distribution of small business loans in 2021 is adequate. The proportion of bank loans to businesses with revenues less than \$1 million, considering only those that reported revenue, is somewhat close to the percentage of small businesses in the AA. Bank loans to businesses with revenues less than \$1 million is below aggregate lending.

OH non-MSA

The borrower distribution of small business loans is adequate. The proportion of bank loans to businesses with revenues less than \$1 million, considering only those that reported revenue, is near to

the percentage of small businesses in the AA. Bank loans to businesses with revenues less than \$1 million is below aggregate lending.

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

Small Loans to Farms

The borrower distribution of small loans to farms reflects a good distribution.

Cincinnati MSA

The bank did not originate a sufficient volume of loans to conduct a meaningful analysis on small loans to farms.

Columbus MSA

The borrower distribution of small loans to farms is good.

The borrower distribution of small loans to farms in 2020 is excellent. The proportion of bank loans to farms with revenues less than \$1 million, considering only those that reported revenue, is near to the percentage of small farms in the AA. Bank loans to farms with revenues less than \$1 million exceeds aggregate lending.

The borrower distribution of small loans to farms in 2021 is adequate. The proportion of bank loans to farms with revenues less than \$1 million, considering only those that reported revenue, is somewhat below the percentage of small farms in the AA. Bank loans to farms with revenues less than \$1 million is below aggregate lending.

OH non-MSA

The borrower distribution of small loans to farms is adequate. The proportion of bank loans to farms with revenues less than \$1 million, considering only those that reported revenue, is close to the percentage of small farms in the AA. Bank loans to farms with revenues less than \$1 million is below aggregate lending.

Refer to Table T in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Community Development Lending

The institution is a leader in making CD loans. This had a significantly positive impact on the Lending Test rating in the state of Ohio.

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

Cincinnati MSA

The institution is a leader in making CD loans. PNB made four CD loans, totaling \$3.2 million, which supported economic development in the AA. This represents 9.8 percent of allocated tier 1 capital.

Additionally, more than half of reported small business loans made in the AA were PPP loans, which would have otherwise received CD credit.

Columbus MSA

The institution is a leader in making CD loans. PNB made 27 CD loans, totaling \$31.4 million, which supported economic development in the AA. This represents 11.3 percent of allocated tier 1 capital. The CD loans include the following:

- Two loans supporting affordable housing, totaling \$23.7 million.
- One loan to an organization providing community services, totaling \$1.5 million.
- 24 loans supporting economic development, totaling \$6.2 million.

Additionally, more than half of reported small business loans made in the AA were PPP loans, which would have otherwise received CD credit.

OH non-MSA

The institution is a leader in making CD loans. PNB made 19 CD loans, totaling \$12.1 million, which supported economic development in the AA. This represents 4.6 percent of allocated tier 1 capital. The CD loans include the following:

- Four loans supporting affordable housing, totaling \$7.1 million.
- One loan to an organization supporting community services, totaling \$137,000.
- 14 loans supporting economic development, totaling \$4.9 million.

Additionally, approximately half of reported small business loans made in the AA were PPP loans, which would have otherwise received CD credit.

Statewide/Regional

The bank also made six CD loans, totaling \$33.6 million, on a statewide/regional basis that received positive consideration in this analysis. This includes the following CD loans:

- Three loans made under the PPP program, totaling \$2.4 million, which aided in businesses remaining open and individuals remaining employed.
- Three loans made supporting affordable housing, totaling \$31.2 million.

Product Innovation and Flexibility

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

Refer to the Other Loan Performance section under the Scope of the Evaluation section at the beginning of this evaluation for additional details regarding other programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Lending Test in the Dayton MSA is stronger than the bank's overall performance under the Lending Test in the full-scope areas. The bank's performance in the Dayton MSA AA is outstanding. The geographic and borrower distribution of loans in the AA is good. CD lending had a positive impact on the rating, with the bank making \$3.7 million in CD loans, or 8.5 percent of allocated tier 1 capital.

Based on limited-scope reviews, the bank's performance under the Lending Test in the Mansfield MSA and Springfield MSA is consistent with the bank's overall performance under the Lending Test in the full-scope areas.

Refer to Tables O through V in the state of Ohio section of appendix D for the facts and data that support these conclusions.

Investment Test

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

Conclusion for the Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Cincinnati OH MSA is outstanding, performance in the Columbus OH MSA is high satisfactory, and the performance in the Ohio Non-MSA is high satisfactory.

In the Cincinnati AA, the bank has an excellent level of qualified investments and grants. The bank exhibits adequate responsiveness to credit and community economic development needs. The bank does not use innovative and/or complex investments to support CD initiatives.

In the Columbus AA, the bank has a good level of qualified investments and grants. The bank exhibits excellent responsiveness to credit and community economic development needs. The bank does not use innovative and/or complex investments to support CD initiatives.

In the Ohio non-MSA AA, the bank has a good level of qualified investments and grants. The bank exhibits adequate responsiveness to credit and community economic development needs. The bank does not use innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Cincinnati MSA	1	38	21	5,448	22	6.4	5,486	21.7	0	0
Columbus MSA	0	0	191	8,121	191	55.5	8,121	32.1	0	0
Dayton MSA	0	0	20	3,552	20	5.8	3,552	14.1	0	0
Mansfield MSA	0	0	15	54	15	4.4	54	0.2	0	0
Ohio non-MSA	0	0	65	7,676	65	18.9	7,676	30.4	0	0
Springfield MSA	0	0	31	373	31	9.0	373	1.5	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.

Cincinnati MSA

PNB made 22 qualified CD investments and donations, totaling \$5.5 million, or 17 percent of allocated tier 1 capital. During the evaluation period, PNB made 22 qualified donations to 11 organizations, totaling \$120,602. In addition to this, the bank pledged \$5.3 million to respond to the AA's need for affordable housing that supported the creation or rehabilitation of 817 affordable housing units. The bank also received credit for a prior period investment of \$38,325, which helped provide financing for affordable housing development and community revitalization.

Columbus MSA

PNB made 191 qualified CD investments and donations, totaling \$8.1 million, or 2.9 percent of allocated tier 1 capital. During the evaluation period, PNB made 183 qualified donations to 84 organizations, totaling \$1.1 million. PNB demonstrated outstanding responsiveness to affordable housing concerns in Columbus and Franklin counties. The bank pledged \$2 million to assist with the creation or rehabilitation of 792 affordable housing units in the AA. Furthermore, PNB pledged \$5 million to an organization funding below-market loans to developers who increase and preserve affordable rental homes in Franklin County. This resulted in the creation or rehabilitation of 1,186 units.

Ohio non-MSA

PNB made 65 qualified CD investments and donations, totaling \$7.7 million, or 2.9 percent of allocated tier 1 capital. During the evaluation period, PNB made 61 qualified donations to 37 organizations, totaling \$315,165. In addition to this, the bank pledged \$7.4 million that assisted with the creation or rehabilitation of 275 affordable housing units in the AA.

Broader Statewide/Regional Area

PNB received credit for the continued support of affordable housing in the broader statewide and regional area. The bank received credit for 16 prior period investments, totaling \$28.2 million, and two current period investments, totaling \$765,932. These investments represented 3.9 percent of allocated tier 1 capital.

Conclusion for Area Receiving a Limited-Scope Review

In the Dayton MSA AA, performance was stronger than the bank's overall performance in the full-scope areas. PNB made an excellent level of qualified investments. The bank made 20 investments, totaling \$3.5 million, or 8.1 percent of allocated tier 1 capital.

In the Mansfield MSA and Springfield MSA AAs, performance was weaker than the bank's overall performance under the Investment Test in the full-scope areas. The bank made 15 qualified investments in the Mansfield MSA AA, representing 0.1 percent of allocated tier 1 capital. The bank made 31 qualified investments, totaling \$372,643, or 0.7 percent of allocated tier 1 capital. During the evaluation period, the bank donated the Western Office building in Springfield, Ohio to an organization that provides assistance to the disadvantaged transitioning from dependence to self-reliance.

Service Test

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

Conclusions for the Area Receiving a Full-Scope Review

Based on full-scope reviews, the bank's performance in the Cincinnati MSA AA is adequate, the performance in the Columbus MSA AA and the Ohio Non-MSA AA is excellent.

Retail Banking Services

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Cincinnati MSA	4.4	5	6.0	0.0	0.0	80.0	20.0	15.7	24.1	32.4	26.3
Columbus MSA	37.4	20	23.8	10.0	25.0	35.0	30.0	18.2	26.7	29.8	24.5
Dayton MSA	5.9	6	7.1	0.0	50.0	33.3	16.7	12.0	22.0	41.2	24.4
Mansfield MSA	8.9	9	10.7	11.1	22.2	22.2	44.4	6.7	23.3	53.3	16.7
Ohio non-MSA	35.6	36	42.9	0.0	25.0	61.1	13.9	2.5	18.0	61.0	16.5
Springfield MSA	7.8	8	9.5	0.0	37.5	50.0	12.5	9.1	31.8	36.4	22.7

Cincinnati MSA

Delivery systems are unreasonably inaccessible to portions of the AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals.

PNB has five branches in the Cincinnati MSA AA. None of these branches are located in LMI CTs, four are located in middle-income CTs, and one is located in an upper-income CT.

PNB has four ATM locations in the AA. Three of the ATMs are full-service ATMs connected to branch locations. This includes two connected to branches in middle-income CTs, and one branch in the upper-income CT. The fourth ATM is a full-service standalone ATM located in a middle-income tract. There are no ATMs located in LMI CTs.

Columbus MSA

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

PNB has 20 branches in the Columbus MSA AA. Two of the branches are in low-income CTs, five are in moderate-income CTs, seven in middle-income CTs, and six are in upper-income CTs.

PNB has 32 ATM locations in the AA. Fifteen of the branch locations have attached ATMs, one in a low-income CT, four in moderate-income CTs, five in middle-income CTs, and five in an upper-income CT. Nearly all ATMs are full-service ATMs with only two locations (one moderate- and one upper-income CT) which do not accept deposits. The remaining 17 ATMs are all standalone ATMs. The

locations of these ATMs include two low-income CTs, two moderate-income CTs, six middle-income CT, and seven upper-income CTs. Of the standalone ATMs, 11 do not accept deposits; however, only one is located in a moderate-income CT.

Ohio non-MSA

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

PNB has 36 branches in the Ohio Non-MSA AA. There are no branches in a low-income CTs; however, only 2.5 percent of the population lives in these CTs. There are nine branches in moderate-income CTs, 22 in middle-income CTs, and five in upper-income CTs.

PNB has 43 ATM locations in the AA. This includes 26 branch locations with attached ATMs, five in moderate-income CTs, 20 in middle-income CTs, and one in an upper-income CT. There are no ATMs located in low-income CTs. Nearly all ATMs are full-service ATMs with only eight locations (four moderate- and four middle-income CTs) which do not accept deposits. The remaining 17 ATMs are all standalone ATMs, with two in moderate-income CTs, eight in middle-income CTs, and seven in upper-income CTs. Of the standalone ATMs, six do not accept deposits; however, only one is located in a moderate-income CT.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Branch Openings/Closings			
			Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Cincinnati MSA	0	4	0	-1	-1	-2
Columbus MSA	1	10	0	-3	-4	-2
Dayton MSA	0	0	0	0	0	0
Mansfield MSA	0	2	0	0	-2	0
Ohio non-MSA	0	6	0	0	-4	-2
Springfield MSA	0	2	-1	0	-1	0

The bank’s record in opening and closing branches has not adversely affected the accessibility of its delivery systems. During the evaluation period, there were 20 branch closures in the full-scope AAs and one branch opening. Four of the branch closures were in moderate-income tracts while the new branch was moved within an upper-income tract.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and/or individuals. Banking hours and services offered are comparable without differences between income levels.

Community Development Services

Cincinnati MSA

The bank is a leader in providing CD services. In the Cincinnati MSA AA, 12 different employees served in nine unique community development organizations. Of these organizations, PNB employees

serve on the board or committee of seven of the organizations. The services performed primarily focused on organizations providing community services to LMI individuals and families. Services also include affordable housing projects to reduce costs and provide housing to lower income families, economic development in LMI CTs, as well as revitalization and development.

Columbus MSA

The bank is a leader in providing CD services. In the Columbus MSA AA, 64 different employees served in 61 unique community development organizations. Of these organizations, PNB employees serve on the board or committee of 54 of the organizations. The services performed primarily focused on organizations providing community services to LMI individuals and families. Employees also volunteered in affordable housing projects to reduce costs and provide housing to lower income families, economic development of LMI CTs, and revitalization and development.

In addition to these CD services, there were five employees who volunteered for financial literacy programs at two schools.

Ohio Non-MSA

The bank is a leader in providing CD services. In the Ohio non-MSA AA, 39 different employees served in 39 unique community development organizations. Of these organizations, PNB employees serve on the board or committee of 30 of the organizations. The services performed primarily focused on organizations providing community services to LMI individuals and families. Employees also volunteered in affordable housing projects to reduce costs and provide housing to lower income families.

In addition to these CD services, there were seven PNB employees who volunteered for financial literacy programs at six schools.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Dayton MSA AA, Mansfield MSA AA, and Springfield MSA AA is consistent with the bank's overall performance under the Service Test in the full-scope areas.

State Rating

State of South Carolina

CRA rating for the State of South Carolina⁴: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect good responsiveness to AA credit needs.
- Good geographic and borrower distribution of loans.
- Relatively high level of CD loans.
- Outstanding level of CD investments in the Greenville MSA AA and an adequate level of investments in the Spartanburg MSA AA.
- Service delivery systems that are reasonably accessible.
- Relatively high level of CD services.

Description of Institution's Operations in South Carolina

PNB has two AAs within the state of South Carolina, the Greenville MSA and the Spartanburg MSA. Two counties in the AAs in the state of South Carolina are in underserved banking deserts. Greenville County, in the Greenville MSA, and Spartanburg County, in the Spartanburg MSA, are in banking deserts.

The state of South Carolina represents the second largest rated area by deposits. PNB has \$511.7 million in deposits in the state, representing 6 percent of bank wide deposits. The bank made 8.6 percent of loans by number and 11 percent of loans by dollar volume in the state of South Carolina.

Greenville MSA

The Greenville MSA consists of 178 census tracts (CTs) and encompasses the counties of Anderson, Greenville, and Pickens. Park has four branch locations and three ATM locations in the AA. According to the FFIEC Census Report, there are 15 low-income CTs, 43 moderate-income CTs, 73 middle-income CTs, and 47 upper-income CTs. The AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income CTs.

⁴ [This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.]

Table A – Demographic Information of the Assessment Area						
Assessment Area: Greenville SC MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	178	8.4	24.2	41.0	26.4	0.0
Population by Geography	786,242	5.8	20.2	42.4	31.6	0.0
Housing Units by Geography	336,396	6.3	21.0	43.2	29.5	0.0
Owner-Occupied Units by Geography	202,752	3.4	17.3	44.3	34.9	0.0
Occupied Rental Units by Geography	95,779	11.0	27.4	39.8	21.7	0.0
Vacant Units by Geography	37,865	9.5	24.7	45.5	20.3	0.0
Businesses by Geography	56,423	6.3	15.9	39.7	38.1	0.0
Farms by Geography	1,506	3.1	15.5	50.5	31.0	0.0
Family Distribution by Income Level	200,884	22.1	16.8	18.8	42.3	0.0
Household Distribution by Income Level	298,531	24.5	15.7	16.6	43.2	0.0
Median Family Income MSA - 24860 Greenville-Anderson, SC MSA		\$58,097	Median Housing Value			\$146,420
			Median Gross Rent			\$749
			Families Below Poverty Level			12.0%
<i>Source: 2015 ACS and 2021 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>						

Competition

Competition for deposits in the Greenville MSA is strong. As of June 30, 2021, Park's deposits in the AA totaled \$258.8 million, or 1.1 percent of total market share. According to the FDIC Deposit Market Share Report, Park ranks 14th out of 34 deposit-taking institutions in the AA. The top five institutions for deposit market share in the AA are Truist, Wells Fargo, Bank of America, TD Bank, and South State Bank. These five institutions account for 62.3 percent of deposit market share. Competition for lending is also strong. Based on 2021 peer mortgage data, 615 lenders originated or purchased residential real estate loans in the AA. Park ranks 47th, with 0.6 percent of market share, by number of loans originated. The top five lenders are Rocket Mortgage, Truist, Wells Fargo, PennyMac Loan Services, and PrimeLending. These lenders account for 22.1 percent of market share by number of loans originated. Based on 2021 peer small business loan data, 148 lenders originated or purchased small business loans in the AA. The top five small business lenders are American Express, Wells Fargo, Bank of America, Truist, and JPMorgan Chase. These lenders account for 48.8 percent of market share by number of loans originated. Park accounts for 0.8 percent of market share and ranks 21st.

Employment and Economic Factors

Information from the December 2022 Moody's Analytics Report indicates the Greenville MSA is a reasonably diversified economy. The leading industries based on percentage of total employment include local government, restaurants, and employment services. The top five employers are Prisma Health, Michelin North America, Clemson University, Milliken & Company, and Bon Secours St. Francis Health System. According to the Bureau of Labor Statistics, the average annual unemployment rate for the AA improved during the review period. The average annual unemployment rate decreased

from 5.6 percent in 2020 to 3.6 percent in 2021. According to 2015 ACS US Census Data, the total population in the AA is 786,242 with 12 percent of families living below the poverty level. Low-income families represent 22.1 percent of all families in the AA and moderate-income families represent 16.8 percent of all families. Approximately 73 percent of households earn a wage or salary, 32.5 percent collect social security, 1.4 percent receive public assistance, and 17.3 percent receive retirement income.

Housing Characteristics and Affordability

According to the 2015 ASC US Census Data, 60.3 percent of housing units in the AA are owner occupied, 28.5 percent are renter occupied, and 11.3 percent are vacant. In low-income CTs in the AA, 32.8 percent of housing units are owner-occupied, 50.1 percent are renter occupied, and 17.1 percent are vacant. In moderate-income CTs, 49.7 percent of houses are owner-occupied, 37.1 percent are renter occupied, and 13.2 percent are vacant. The median age of the housing stock in the AA is 38 years and the median housing value is \$146,420.

The cost of home ownership may be a challenge for some LMI families. Assuming a 30-year mortgage with a 6 percent interest rate, and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$29,049 per year (or less than 50 percent of the 2020 FFIEC AMFI in the AA) could afford a \$121,126 mortgage with a payment of \$726 per month. A moderate-income borrower making \$46,478 per year (or less than 80 percent of the 2020 FFIEC AMFI in the AA) could afford a \$193,802 mortgage with a payment of \$1,162 per month. This illustrates that low-income borrowers may be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$878 when also considering down payment requirements, other owner costs, and additional monthly expenses.

Community Contact

Two community contacts were performed with community organizations focused on economic development within the area. Both organizations indicated that, in general, banks are serving all individuals equally and meeting the credit needs of the area well. No concerns were noted related to discrimination. One organization stated there is a need for more bank involvement with SBA lending. The participating organizations also noted some challenges with availability of affordable housing in the area. The representatives identified an increasing need for banks to support organizations focused on keeping LMI residents in their homes, affordable housing initiatives, and financial education services.

Scope of Evaluation in South Carolina

In the state of South Carolina, the Greenville MSA AA received a full-scope review, and the Spartanburg MSA AA received a limited-scope review. Deposits within the state are almost equally divided between the two AAs, with Greenville accounting for 50.6 percent of deposits and Spartanburg accounting for 49.4 percent. The Greenville MSA AA did account for slightly more loans in the AA during the review period, with 55.9 percent by number and 53.3 percent by dollar volume. The primary reason for selecting the Greenville MSA for a full-scope review is that the Spartanburg MSA AA received a full-scope review during the last evaluation, while the Greenville MSA AA received a limited-scope review.

In the Greenville MSA AA, home mortgage loans are weighted more heavily than small business loans. Home mortgage loans represent 60.7 percent of loans by number and 72.4 percent of loans by dollar volume in the Greenville MSA AA. In the Spartanburg MSA AA, small business loans are weighted more heavily than home mortgage loans. Small business loans represent 69.5 percent of loans by

number and 57.2 percent by dollar volume in the Spartanburg MSA AA. The bank did not make a sufficient volume of small farm loans in either AA during the evaluation period for a meaningful review.

Refer to Appendix A: Scope of Evaluation for information on all AAs under review.

Conclusions in Respect to Performance Tests in South Carolina

Lending Test

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

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Greenville MSA	713	462	6	3	1184	55.9	50.6
Spartanburg MSA	284	648	1	2	935	44.1	49.4

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

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Greenville MSA	\$150,597	\$57,457	\$553	\$1,753	\$210,360	52.4	50.6
Spartanburg MSA	\$78,069	\$104,368	\$3	\$8,334	\$190,774	47.6	49.4

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

As noted in the competition section above, the bank's loan market share for both home mortgage and small business loans was below the deposit market share in the AA. However, competition for both home mortgage and small business loans was stronger than competition for deposits. There were 615 lenders competing for home mortgage loans and 148 competing for small business loans, while there were only 34 institutions competing for deposits. Therefore, the bank's lending levels are good in the AA.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

The geographic distribution of home mortgage loans is good. The percentage of home mortgage loans in low-income geographies is somewhat close to the percentage of owner-occupied housing and close to the aggregate distribution of loans in those geographies. The proportion of loans to moderate-income geographies is somewhat close to the percentage of owner-occupied housing and exceeds aggregate distribution of loans in those geographies.

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

Small Loans to Businesses

The geographic distribution of small loans to businesses is excellent. The percentage of small loans to businesses in low-income geographies is close to the percentage of businesses and exceeds aggregate distribution of loans in those geographies. The percentage of small loans to businesses in moderate-income geographies exceeds the percentage of businesses and aggregate distribution of loans in those geographies.

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

Small Loans to Farms

The bank did not originate a sufficient volume of loans to conduct a meaningful analysis on small loans to farms.

Refer to Table S in the state of South Carolina section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. The OCC reviewed summary reports, maps, and analyzed the bank's lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. The OCC did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

The borrower distribution of home mortgage loans is good. The percentage of loans to low-income borrowers is below the percentage of low-income families in the AA but close to aggregate lending. The percentage of loans to moderate-income borrowers is close to the percentage of moderate-income families in the AA and aggregate lending.

Refer to Table P in the state of South Carolina section of appendix D 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

The borrower distribution of small loans to businesses is adequate. The proportion of bank loans to businesses with revenues less than \$1 million, considering only those that reported revenue, is close to the percentage of small businesses in the AA. Bank loans to businesses with revenues less than \$1 million is below aggregate lending.

Refer to Table R in the state of South Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Small Loans to Farms

The bank did not originate a sufficient volume of loans to conduct a meaningful analysis on small loans to farms.

Refer to Table T in the state of South Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Community Development Lending

The institution has made a relatively high level of CD loans. This had a positive impact on the Lending Test rating in South Carolina.

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

PNB made one CD loan, totaling \$1.3 million, which supported economic development. This represents 5 percent of allocated tier 1 capital. Additionally, the bank made a significant volume of PPP loans reported under small loans to businesses, representing over 60 percent of reported business loans. This had a positive impact on the rating.

Product Innovation and Flexibility

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

Refer to the Other Loan Performance section under the Scope of the Evaluation section at the beginning of this evaluation for additional details regarding other programs.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Spartanburg MSA is consistent with the bank's overall performance under the Lending Test in the full-scope areas. While the geographic and borrower distribution of loans in this AA was considered adequate, CD lending in the AA was stronger than CD lending in the Greenville MSA, totaling \$8.3 million, or 33.9 percent of allocated tier 1 capital.

Refer to Tables O through V in the state of South Carolina section of appendix D for the facts and data that support these conclusions.

Investment Test

The bank's performance under the Investment Test in South Carolina is High Satisfactory.

Conclusions for the Area Receiving a Full-Scope Review

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

The bank made an outstanding level of qualified CD investments and grants. The bank exhibits adequate responsiveness to credit and community economic development needs. The bank does not use innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Greenville MSA	2	592	6	1,987	8	44.4	2,579	85.4	0	0
Spartanburg MSA	1	127	9	314	10	55.6	441	14.6	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.

PNB made eight qualified CD investments and donations, totaling \$2.6 million, or 10.2 percent of allocated tier 1 capital. During the current period, PNB made five qualified donations to three organizations, totaling \$12,162. Additionally, PNB invested in a qualified mortgage-backed security (MBS), with a majority of loans made to LMI borrowers, totaling \$2 million. The bank also received credit for two MBS investments from the prior period, totaling \$591,926.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance in the Spartanburg MSA AA is weaker than the bank's overall performance under the Investment Test in the full-scope area. PNB had seven qualified CD investments and donations, totaling \$441,417, representing 1.8 percent of allocated tier 1 capital.

Service Test

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

Conclusions for Areas Receiving Full-Scope Reviews

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

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Greenville MSA	50.6	4.0	80.0	0.0	25.0	50.0	25.0	0.0	8.4	24.2	41.0
Spartanburg MSA	49.4	1.0	20.0	0.0	0.0	0.0	100.0	0.0	8.7	24.6	40.6

PNB has four branch locations within the Greenville MSA AA. Of these four branches, none are located in a low-income CTs, one is located in a moderate-income CT, two are located in middle-income CTs, and one is located in an upper-income CT.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Branch Openings/Closings			
			Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Greenville MSA	0	0	0	0	0	0
Spartanburg MSA	0	0	0	0	0	0

The bank's record in opening and closing branches has not adversely affected the accessibility of its delivery systems. The bank did not open or close branches during the evaluation period.

PNB has three ATMs in the AA, with one in a moderate-income CT, one in a middle-income CT, and one in an upper-income CT. All ATMs are located at bank branches and only the ATM located in the moderate-income CT accepts deposits.

Community Development Services

The bank provides a relatively high level of CD services. In the Greenville MSA AA, five different employees served in seven unique community development organizations. Of these organizations, PNB employees serve on the board or committee of four of the organizations. The services performed primarily focused on organizations providing community services to LMI individuals and families. In addition to this, employees volunteered in affordable housing projects to reduce costs and provide housing to lower income families.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Spartanburg MSA AA is weaker than the bank's overall performance under the Service Test in the full-scope area. The bank did not provide any CD services and has only one branch location, located in an upper-income CT in the AA.

Appendix A: Scope of Examination

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

Time Period Reviewed:	January 1, 2020 – December 31, 2021	
Bank Products Reviewed:	Home mortgage, small business, and small farm loans. CD loans, qualified investments, and CD services.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Kentucky		
Louisville-Jefferson County MSA	Full-Scope	Portion of MSA #31140: Jefferson County
State of North Carolina		
Asheville MSA	Full-Scope	Portion of MSA #11700: Buncombe and Henderson Counties
Charlotte-Concord-Gastonia MSA	Limited-Scope	Portion of MSA #16740: Mecklenburg County Also included Iredell County in 2020.
State of Ohio		
Cincinnati MSA	Full-Scope	Portion of MSA #17140: Clermont and Hamilton Counties Also included Butler and Warren Counties in 2020.
Columbus MSA	Full-Scope	Portion of MSA #18140: Fairfield, Franklin, Hocking, Licking, Morrow, and Perry Counties Also included Madison County in 2020.
Dayton-Kettering MSA	Limited-Scope	Entire MSA #19430: Greene, Miami, and Montgomery Counties
Mansfield MSA	Limited-Scope	Entire MSA #31900: Richland County
OH non-MSA	Full-Scope	Includes non-MSA counties of Ashland, Athens, Champaign, Coshocton, Crawford, Darke, Guernsey, Holmes, Knox, Marion, Mercer, Muskingum, Tuscarawas, and Wayne
Springfield MSA	Limited-Scope	Entire MSA #44220: Clark County
State of South Carolina		
Greenville-Anderson MSA	Full-Scope	Portion of MSA #24860: Anderson, Greenville, and Pickens Counties
Spartanburg MSA	Limited-Scope	Entire MSA #43900: Spartanburg County

Appendix B: Summary of MMSA and State Ratings

RATINGS (BANK NAME)				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
State:				
Kentucky	Low Satisfactory	Outstanding	Low Satisfactory	Satisfactory
North Carolina	Low Satisfactory	Outstanding	High Satisfactory	Satisfactory
Ohio	High Satisfactory	High Satisfactory	Outstanding	Satisfactory
South Carolina	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan.

This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

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

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

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

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

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

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

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

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

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

determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

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

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

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

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

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

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

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

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

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

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

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

original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

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

Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

Kentucky

Louisville-Jefferson County MSA

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2020-21

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Louisville MSA	24	6,096	100.0	42,540	6.0	0.0	3.7	17.9	12.5	14.9	36.8	12.5	34.9	39.2	66.7	46.4	0.1	8.3	0.1
Total	24	6,096	100.0	42,540	6.0	0.0	3.7	17.9	12.5	14.9	36.8	12.5	34.9	39.2	66.7	46.4	0.1	8.3	0.1

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2020-21

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Louisville MSA	24	6,096	100.0	42,540	23.0	0.0	9.9	17.5	4.2	21.3	19.1	12.5	19.8	40.4	29.2	33.2	0.0	54.2	15.9
Total	24	6,096	100.0	42,540	23.0	0.0	9.9	17.5	4.2	21.3	19.1	12.5	19.8	40.4	29.2	33.2	0.0	54.2	15.9

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.00

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

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Louisville MSA	30	6,527	100.0	18,642	9.2	6.7	8.2	16.4	3.3	15.4	28.0	23.3	27.8	41.9	60.0	44.2	4.5	6.7	4.4
Total	30	6,527	100.0	18,642	9.2	6.7	8.2	16.4	3.3	15.4	28.0	23.3	27.8	41.9	60.0	44.2	4.5	6.7	4.4

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2020-21

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Louisville MSA	30	6,527	100.0	18,642	87.7	33.3	45.6	4.1	6.7	8.1	60.0
Total	30	6,527	100.0	18,642	87.7	33.3	45.6	4.1	6.7	8.1	60.0

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

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-21	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Louisville MSA	0	0	0.0	66	6.2	0.0	1.5	13.4	0.0	7.6	33.5	0.0	22.7	45.4	0.0	68.2	1.4	0.0	0.0	
Total	0	0	0.0	66	6.2	0.0	1.5	13.4	0.0	7.6	33.5	0.0	22.7	45.4	0.0	68.2	1.4	0.0	0.0	

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

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-21	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Louisville MSA	--	--	--	66	97.0	--	57.6	1.5	--	1.5	--	
Total	--	--	--	66	97.0	--	57.6	1.5	--	1.5	--	

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

North Carolina

Asheville MSA

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2020-21	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
Asheville MSA	275	89,082	100.0	23,345	1.6	1.5	1.7	9.4	6.2	9.4	63.8	45.5	62.0	25.1	46.9	27.0	0.0	0.0	0.0		
Total	275	89,082	100.0	23,345	1.6	1.5	1.7	9.4	6.2	9.4	63.8	45.5	62.0	25.1	46.9	27.0	0.0	0.0	0.0		

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2020-21	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Asheville MSA	275	89,082	100.0	23,345	19.4	2.5	5.7	18.4	4.7	16.6	20.5	12.4	21.7	41.7	73.8	42.8	0.0	6.5	13.2		
Total	275	89,082	100.0	23,345	19.4	2.5	5.7	18.4	4.7	16.6	20.5	12.4	21.7	41.7	73.8	42.8	0.0	6.5	13.2		

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2020-21		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts					
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate			
Asheville MSA	287	53,416	100.0	12,148	3.3	4.5	3.4	14.1	17.8	15.1	52.2	48.8	52.5	30.4	28.9	29.0	0.0	0.0	0.0			
Total	287	53,416	100.0	12,148	3.3	4.5	3.4	14.1	17.8	15.1	52.2	48.8	52.5	30.4	28.9	29.0	0.0	0.0	0.0			

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2020-21	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Asheville MSA	287	53,416	100.0	12,148	89.9	22.0	49.2	3.1	22.0	7.0	56.1		
Total	287	53,416	100.0	12,148	89.9	22.0	49.2	3.1	22.0	7.0	56.1		

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

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-21	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Asheville NC MSA	3	296	100.0	80	1.5	33.3	1.3	11.8	0.0	8.8	65.2	66.7	73.8	21.5	0.0	16.3	0.0	0.0	0.0	
Total	3	296	100.0	80	1.5	33.3	1.3	11.8	0.0	8.8	65.2	66.7	73.8	21.5	0.0	16.3	0.0	0.0	0.0	

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

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-21	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Asheville MSA	3	296	100.0	80	97.8	0.0	57.5	1.2	0.0	1.0	100.0	
Total	3	296	100.0	80	97.8	0.0	57.5	1.2	0.0	1.0	100.0	

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

Charlotte-Concord-Gastonia MSA

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2020
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	
Charlotte MSA	94	45,164	100.0	87,528	4.2	3.2	3.3	15.6	5.3	12.5	29.2	13.8	25.0	50.9	77.7	59.1	0.0	0.0	0.1	
Total	94	45,164	100.0	87,528	4.2	3.2	3.3	15.6	5.3	12.5	29.2	13.8	25.0	50.9	77.7	59.1	0.0	0.0	0.1	

*Source: 2015 ACS; 01/01/2020 - 12/31/2020 Bank Data, 2020 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																				2021
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	
Charlotte MSA	44	15,413	100.0	76,398	4.3	0.0	4.0	16.1	13.6	14.0	24.9	20.5	24.1	54.6	65.9	57.8	0.0	0.0	0.1	
Total	44	15,413	100.0	76,398	4.3	0.0	4.0	16.1	13.6	14.0	24.9	20.5	24.1	54.6	65.9	57.8	0.0	0.0	0.1	

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020	
	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	
Charlotte MSA	94	45,164	100.0	87,528	22.1	2.1	3.5	15.5	1.1	11.7	17.6	10.6	17.8	44.8	76.6	51.8	0.0	9.6	15.1	
Total	94	45,164	100.0	87,528	22.1	2.1	3.5	15.5	1.1	11.7	17.6	10.6	17.8	44.8	76.6	51.8	0.0	9.6	15.1	

*Source: 2015 ACS; 01/01/2020 - 12/31/2020 Bank Data, 2020 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																			2021	
	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	
Charlotte MSA	44	15,413	100.0	76,398	21.8	0.0	3.6	15.2	15.9	12.6	17.1	15.9	17.9	45.8	59.1	50.6	0.0	9.1	15.3	
Total	44	15,413	100.0	76,398	21.8	0.0	3.6	15.2	15.9	12.6	17.1	15.9	17.9	45.8	59.1	50.6	0.0	9.1	15.3	

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2020
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	
Charlotte MSA	220	34,222	100.0	41,437	8.0	14.5	8.4	15.4	6.4	14.9	23.4	17.7	23.4	52.1	60.5	52.4	1.1	0.9	0.9	
Total	220	34,222	100.0	41,437	8.0	14.5	8.4	15.4	6.4	14.9	23.4	17.7	23.4	52.1	60.5	52.4	1.1	0.9	0.9	

Source: 2020 D&B Data; 01/01/2020 - 12/31/2020 Bank Data; 2020 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																				2021
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	
Charlotte MSA	134	27,519	100.0	43,957	8.5	12.7	9.0	15.5	16.4	16.4	23.5	17.9	23.3	51.4	52.2	50.4	1.0	0.7	0.8	
Total	134	27,519	100.0	43,957	8.5	12.7	9.0	15.5	16.4	16.4	23.5	17.9	23.3	51.4	52.2	50.4	1.0	0.7	0.8	

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2020
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	
Charlotte MSA	220	34,222	100.0	41,437	87.7	10.5	41.0	4.0	11.4	8.3	78.2	
Total	220	34,222	100.0	41,437	87.7	10.5	41.0	4.0	11.4	8.3	78.2	
<i>Source: 2020 D&B Data; 01/01/2020 - 12/31/2020 Bank Data; 2020 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												2021
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	
Charlotte MSA	134	27,519	100.0	43,957	88.8	17.2	45.5	3.4	15.7	7.9	67.2	
Total	134	27,519	100.0	43,957	88.8	17.2	45.5	3.4	15.7	7.9	67.2	
<i>Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>												

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Charlotte MSA	0	0	0.0	106	6.5	0.0	4.7	16.3	0.0	17.9	33.4	0.0	34.9	43.4	0.0	42.5	0.4	0.0	0.0
Total	0	0	0.0	106	6.5	0.0	4.7	16.3	0.0	17.9	33.4	0.0	34.9	43.4	0.0	42.5	0.4	0.0	0.0

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

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2021
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Charlotte MSA	0	0	0.0	72	8.4	0.0	4.2	17.1	0.0	9.7	26.2	0.0	13.9	47.7	0.0	72.2	0.6	0.0	0.0
Total	0	0	0.0	72	8.4	0.0	4.2	17.1	0.0	9.7	26.2	0.0	13.9	47.7	0.0	72.2	0.6	0.0	0.0

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

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Charlotte MSA	--	--	--	106	95.4	--	49.1	2.5	--	2.1	--
Total	--	--	--	106	95.4	--	49.1	2.5	--	2.1	--

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

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Charlotte MSA	--	--	--	72	95.2	--	62.5	2.5	--	2.3	--
Total	--	--	--	72	95.2	--	62.5	2.5	--	2.3	--

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

Ohio

Cincinnati MSA and Columbus MSA

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020	
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	
Cincinnati MSA	502	116,960	17.0	92,843	4.1	2.0	2.5	15.1	13.3	11.2	39.2	51.2	36.5	41.5	33.3	49.7	0.1	0.2	0.1	
Columbus MSA	2,446	454,918	83.0	98,244	6.3	3.8	4.9	21.0	17.2	16.3	38.1	49.7	36.0	34.6	29.2	42.7	0.0	0.1	0.0	
Total	2,948	571,878	100.0	191,087	5.2	3.5	3.8	18.0	16.6	13.8	38.6	49.9	36.2	38.2	29.9	46.1	0.1	0.1	0.1	

Source: 2015 ACS; 01/01/2020 - 12/31/2020 Bank Data, 2020 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																			2021	
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	
Cincinnati MSA	329	73,661	16.5	56,934	4.8	0.9	4.5	17.7	15.2	16.4	40.0	50.5	39.3	37.5	33.4	39.6	0.1	0.0	0.1	
Columbus MSA	1,662	279,403	83.5	97,313	6.5	4.6	6.3	21.4	18.6	18.9	36.7	51.0	34.5	35.3	25.8	40.3	0.0	0.0	0.0	
Total	1,991	353,064	100.0	154,247	5.8	4.0	5.6	19.9	18.0	18.0	38.0	50.9	36.3	36.2	27.0	40.0	0.1	0.0	0.1	

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Cincinnati MSA	502	116,960	17.0	92,843	22.3	4.2	6.7	16.1	13.9	15.9	19.4	17.7	19.5	42.2	51.6	42.0	0.0	12.6	15.9	
Columbus MSA	2,446	454,918	83.0	98,244	24.1	8.7	8.2	17.8	19.6	18.5	19.9	22.6	21.3	38.2	38.2	34.8	0.0	10.9	17.1	
Total	2,948	571,878	100.0	191,087	23.2	7.9	7.5	17.0	18.6	17.3	19.7	21.8	20.5	40.2	40.5	38.3	0.0	11.2	16.5	

Source: 2015 ACS; 01/01/2020 - 12/31/2020 Bank Data, 2020 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																			2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Cincinnati MSA	329	73,661	16.5	56,934	25.3	7.6	8.2	16.0	15.5	19.4	18.8	19.1	20.5	40.0	46.8	36.3	0.0	10.9	15.6	
Columbus MSA	1,662	279,403	83.5	97,313	24.2	11.8	8.3	17.8	20.3	20.2	19.8	22.0	20.8	38.1	38.1	33.9	0.0	7.8	16.7	
Total	1,991	353,064	100.0	154,247	24.6	11.1	8.3	17.1	19.5	19.9	19.4	21.5	20.7	38.8	39.5	34.8	0.0	8.3	16.3	

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2020
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	
Cincinnati MSA	371	48,571	21.0	36,254	7.4	3.8	7.0	17.7	14.0	16.8	31.8	42.3	31.4	41.8	38.5	43.9	1.2	1.3	0.9	
Columbus MSA	1,392	173,851	79.0	35,040	10.7	9.7	9.2	20.0	22.6	17.1	30.9	40.7	29.3	37.9	26.6	44.1	0.5	0.4	0.3	
Total	1,763	222,422	100.0	71,294	9.1	8.5	8.1	19.0	20.8	17.0	31.3	41.1	30.4	39.7	29.1	44.0	0.8	0.6	0.6	

*Source: 2020 D&B Data; 01/01/2020 - 12/31/2020 Bank Data; 2020 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																				2021
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	
Cincinnati MSA	223	34,846	17.6	24,318	7.4	4.0	8.0	21.1	17.0	21.4	31.2	42.6	31.2	38.9	35.0	38.4	1.4	1.3	0.9	
Columbus MSA	1,047	137,829	82.4	38,525	10.9	8.6	10.2	20.3	19.4	18.8	29.9	43.3	29.0	38.4	28.3	41.7	0.6	0.5	0.3	
Total	1,270	172,675	100.0	62,843	9.6	7.8	9.48	20.6	19.0	19.8	30.4	43.2	29.9	38.6	29.4	40.4	0.9	0.6	0.6	

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2020
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	
Cincinnati MSA	371	48,571	21.0	36,254	82.3	14.0	43.5	6.3	4.6	11.5	81.4	
Columbus MSA	1,392	173,851	79.0	35,040	83.8	21.0	41.1	5.1	9.3	11.1	69.8	
Total	1,763	222,422	100.0	71,294	83.1	19.5	42.3	5.7	8.3	11.2	72.2	
<i>Source: 2020 D&B Data; 01/01/2020 - 12/31/2020 Bank Data; 2020 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												2021
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	
Cincinnati MSA	223	34,846	17.6	24,318	81.8	20.6	48.7	6.3	7.6	12.0	71.7	
Columbus MSA	1,047	137,829	82.4	38,525	83.8	22.4	44.9	4.9	11.0	11.3	66.7	
Total	1,270	172,675	100.0	62,843	83.0	22.0	46.4	5.4	10.4	11.6	67.6	
<i>Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>												

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																				2020
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Cincinnati MSA	4	191	9.3	155	3.5	0.0	3.9	13.4	25.0	7.7	45.9	25.0	49.7	37.0	50.0	38.7	0.2	0.0	0.0	
Columbus MSA	39	3,761	90.7	429	6.2	2.6	4.7	17.0	5.1	10.3	46.6	79.5	61.5	30.0	12.8	23.5	0.1	0.0	0.0	
Total	43	3,952	100.0	584	4.9	2.3	4.5	15.3	7.0	9.6	46.3	74.4	58.4	33.3	16.3	27.6	0.2	0.0	0.0	

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

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																				2021
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Cincinnati MSA	1	6	1.7	89	4.2	0.0	4.5	17.4	0.0	20.2	42.8	0.0	47.2	35.3	100.0	28.1	0.2	0.0	0.0	
Columbus MSA	58	3,662	98.3	358	6.8	1.7	3.4	17.8	3.4	12.0	43.8	72.4	58.4	31.4	22.4	26.0	0.2	0.0	0.3	
Total	59	3,668	100.0	447	5.9	1.7	3.6	17.7	3.4	13.6	43.5	71.2	56.2	32.8	23.7	26.4	0.2	0.0	0.2	

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

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Cincinnati MSA	4	191	9.3	155	95.9	0.0	64.5	2.0	0.0	2.0	100.0
Columbus MSA	39	3,761	90.7	429	95.6	64.1	49.4	2.5	5.1	1.9	30.8
Total	43	3,952	100.0	584	95.8	58.1	53.4	2.3	4.7	1.9	37.2
<i>Source: 2020 D&B Data; 01/01/2020 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Cincinnati MSA	1	6	1.7	89	95.8	0.0	66.3	2.1	0.0	2.0	100.0
Columbus MSA	58	3,662	98.3	358	95.7	19.0	47.5	2.4	6.9	2.0	74.1
Total	59	3,668	100.0	447	95.7	18.6	51.2	2.3	6.8	2.0	74.6
<i>Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>											

Dayton MSA, Mansfield MSA, OH Non-MSA, and Springfield MSA

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-21	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Dayton MSA	646	100,328	8.7	41,509	5.7	1.4	2.9	16.3	20.4	12.7	45.6	46.0	45.0	32.4	32.2	39.4	0.0	0.0	0.0	
Mansfield MSA	1,090	135,932	14.6	4,563	2.2	0.5	0.7	13.6	9.0	10.1	57.9	55.4	58.8	26.3	35.1	30.3	0.0	0.0	0.0	
OH non-MSA	5,171	700,971	69.4	26,528	1.1	0.5	0.7	12.7	8.2	12.1	67.7	73.0	67.0	18.5	18.3	20.1	0.1	0.0	0.1	
Springfield MSA	545	67,137	7.3	5,848	3.1	2.4	1.0	20.2	18.5	18.4	46.6	43.9	47.1	30.1	35.2	33.6	0.0	0.0	0.0	
Total	7,452	1,004,368	100.0	78,448	3.2	0.7	1.9	14.8	10.2	12.8	56.3	65.9	53.4	25.6	23.2	31.9	0.0	0.0	0.0	

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21	
	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	
Dayton MSA	646	100,328	8.7	41,509	22.6	8.8	8.2	17.0	21.4	18.8	19.6	21.8	20.7	40.9	36.5	33.3	0.0	11.5	19.1	
Mansfield MSA	1,090	135,932	14.6	4,563	20.6	8.9	6.5	18.5	20.7	19.9	20.9	23.4	23.2	40.0	41.0	35.4	0.0	6.0	15.0	
OH non-MSA	5,171	700,971	69.4	26,528	20.1	6.0	6.7	18.2	18.1	19.9	22.4	24.2	23.4	39.3	45.2	33.1	0.0	6.5	16.8	
Springfield MSA	545	67,137	7.3	5,848	20.9	6.8	6.7	17.4	16.9	18.9	20.9	18.0	21.6	40.8	44.6	32.8	0.0	13.8	20.0	
Total	7,452	1,004,368	100.0	78,448	21.2	6.7	7.5	17.7	18.7	19.2	21.0	23.4	21.8	40.1	43.8	33.3	0.0	7.4	18.1	
<i>Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>																				

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
Dayton MSA	611	76,264	12.8	14,196	7.2	3.9	6.5	17.4	23.4	17.4	43.0	50.9	42.0	32.3	21.6	34.0	0.0	0.2	0.0
Mansfield MSA	716	82,055	15.0	1,922	9.3	13.1	8.0	15.0	12.6	14.1	48.5	46.4	52.9	27.2	27.9	25.0	0.0	0.0	0.0
OH non-MSA	2,840	267,043	59.6	12,039	1.6	0.8	1.0	15.8	10.4	12.3	63.9	70.4	67.1	17.7	18.3	19.0	1.0	0.2	0.6
Springfield MSA	602	74,812	12.6	1,680	4.8	4.5	4.0	27.6	32.7	25.4	37.8	37.5	37.5	29.8	25.2	33.1	0.0	0.0	0.0
Total	4,769	500,174	100.0	29,837	4.9	3.5	4.2	17.1	15.2	15.6	51.9	60.1	52.6	25.7	21.0	27.3	0.4	0.1	0.2

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-21	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Dayton MSA	611	76,264	12.8	14,196	81.5	18.7	47.9	5.8	20.8	12.7	60.6	
Mansfield MSA	716	82,055	15.0	1,922	78.5	19.3	46.8	5.8	10.9	15.7	69.8	
OH non-MSA	2,840	267,043	59.6	12,039	80.1	26.9	47.8	5.8	9.0	14.1	64.1	
Springfield MSA	602	74,812	12.6	1,680	79.3	25.6	51.8	6.1	10.5	14.6	64.0	
Total	4,769	500,174	100.0	29,837	80.6	24.5	48.0	5.8	11.0	13.6	64.5	
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>												

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Dayton MSA	55	2,371	5.7	233	3.1	0.0	0.4	12.4	9.1	8.6	53.1	49.1	53.6	31.4	41.8	37.3	0.0	0.0	0.0
Mansfield MSA	28	2,034	2.9	79	1.3	0.0	0.0	7.5	3.6	1.3	61.8	64.3	74.7	29.3	32.1	24.1	0.0	0.0	0.0
OH non-MSA	701	37,055	72.9	1,501	0.3	0.0	0.0	4.9	1.4	2.5	69.3	64.5	70.5	25.3	34.1	27.0	0.1	0.0	0.0
Springfield MSA	177	12,343	18.4	180	2.7	0.0	0.0	17.7	0.0	0.6	45.8	73.4	61.1	33.8	26.6	38.3	0.0	0.0	0.0
Total	961	53,803	100.0	1,993	1.3	0.0	0.1	7.8	1.7	3.0	63.3	65.2	67.8	27.6	33.1	29.2	0.0	0.0	0.0

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

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-21	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Dayton MSA	55	2,371	5.7	233	96.1	23.6	57.1	2.3	0.0	1.6	76.4	
Mansfield MSA	28	2,034	2.9	79	97.8	32.1	51.9	1.3	0.0	0.8	67.9	
OH non-MSA	701	37,055	72.9	1,501	97.8	32.0	51.3	1.2	3.7	1.0	64.3	
Springfield MSA	177	12,343	18.4	180	97.5	46.9	37.8	2.2	2.3	0.3	50.8	
Total	961	53,803	100.0	1,993	97.4	34.2	50.8	1.5	3.1	1.1	62.6	
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>												

South Carolina

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
Greenville MSA	713	150,597	71.5	48,993	3.4	2.2	2.9	17.3	14.0	11.6	44.3	41.8	42.1	34.9	41.9	43.5	0.0	0.0	0.0
Spartanburg MSA	284	78,069	28.5	18,312	2.3	0.7	1.1	15.6	4.2	9.3	47.1	28.9	42.7	35.1	66.2	46.9	0.0	0.0	0.0
Total	997	228,666	100.0	67,305	3.1	1.8	2.4	16.9	11.2	11.0	45.1	38.1	42.3	35.0	48.8	44.4	0.0	0.0	0.0

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Greenville MSA	713	150,597	71.5	48,993	22.1	5.5	6.3	16.8	16.0	18.0	18.8	20.2	20.7	42.3	50.1	36.9	0.0	8.3	18.1
Spartanburg MSA	284	78,069	28.5	18,312	21.0	1.1	6.4	17.4	8.1	21.5	18.9	14.1	22.1	42.7	69.0	30.3	0.0	7.7	19.7
Total	997	228,666	100.0	67,305	21.8	4.2	6.3	17.0	13.7	18.9	18.8	18.5	21.1	42.4	55.5	35.1	0.0	8.1	18.5

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-21	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Greenville MSA	462	57,457	41.6	21,330	6.3	6.1	5.6	15.9	18.0	13.8	39.7	43.9	39.1	38.1	32.0	41.5	0.0	0.0	0.0	
Spartanburg MSA	648	104,368	58.4	7,527	2.4	1.7	1.8	20.8	24.4	17.2	40.2	26.4	42.4	36.7	47.5	38.7	0.0	0.0	0.0	
Total	1,110	161,825	100.0	28,857	5.3	3.5	4.6	17.1	21.7	14.7	39.8	33.7	40.0	37.8	41.1	40.8	0.0	0.0	0.0	

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2020-21	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Greenville MSA	462	57,457	41.6	21,330	83.6	26.8	47.8	5.0	7.8	11.4	65.4		
Spartanburg MSA	648	104,368	58.4	7,527	82.4	28.1	46.0	5.4	17.0	12.2	54.9		
Total	1,110	161,825	100.0	28,857	83.3	27.6	47.3	5.1	13.2	11.6	59.3		

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

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-21	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Greenville MSA	6	553	85.7	134	3.1	0.0	1.5	15.5	50.0	22.4	50.5	33.3	47.8	31.0	16.7	28.4	0.0	0.0	0.0	
Spartanburg MSA	1	3	14.3	45	1.1	0.0	0.0	16.1	0.0	24.4	45.8	100.0	53.3	37.1	0.0	22.2	0.0	0.0	0.0	
Total	7	556	100.0	179	2.5	0.0	1.1	15.6	42.9	22.9	49.2	42.9	49.2	32.7	14.3	26.8	0.0	0.0	0.0	

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

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-21	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Greenville MSA	6	553	85.7	134	96.8	16.7	53.0	1.5	0.0	1.7	83.3	
Spartanburg MSA	1	3	14.3	45	96.5	0.0	35.6	1.6	0.0	1.9	100.0	
Total	7	556	100.0	179	96.7	14.3	48.6	1.5	0.0	1.8	85.7	

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