

PUBLIC DISCLOSURE

October 09, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Conway National Bank Charter Number 10536

> 1400 Third Avenue Conway, SC 29526

Office of the Comptroller of the Currency

101 South Tryon Street Suite 400 Charlotte, NC 28280

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 Outstanding.

The following table indicates the performance level of The Conway National Bank (CNB or the bank) with respect to the Lending, Investment, and Service Tests:

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

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

The major factors that support this rating include:

- The Lending Test rating is based on the Outstanding performance in the state of South Carolina.
- The Investment Test rating is based on the Low Satisfactory performance in the state of South Carolina.
- The Service Test rating is based on the Outstanding performance in the state of South Carolina.

Lending in Assessment Area

A substantial majority of the bank's loans are in its assessment area (AA).

The bank originated 95.3 percent of its total loans inside the bank's AA 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				Dollar A	mount	of Loans \$	(000s)	Total		
	Inst	ide	le Outside		Total	Insie	Inside		Outside			
	#	%	#	%	#	\$	%	\$	%	\$(000s)		
Home Mortgage	1,132	95.0	59	5.0	1,191	206,072	93.0	15,498	7.0	221,570		
Small Business	3,083	95.4	150	4.6	3,233	322,577	95.8	14,075	4.2	336,652		
Total	4,215	95.3	209	4.7	4,424	528,649	94.7	29,573	5.3	558,222		
· · · · ·	ource: Bank Data; Evaluation Period: 1/1/2020 – 12/31/2022 Due to rounding, totals may not equal 100.0%											

This performance was factored positively into the overall analysis of the geographic distribution of lending by income level of geography.

Description of Institution

CNB is an intrastate bank headquartered in Conway, South Carolina (SC). The bank was organized in 1903 and nationally charted in 1914. CNB has no subsidiaries and is owned by CNB Corporation, Inc., a one-bank holding company also headquartered in Conway, SC.

The bank's market area included Horry County, SC, and the Waccamaw Neck area of Georgetown County, SC. The bank had one AA located within the Myrtle Beach-Conway, SC Combined Statistical Area (CSA) # 396. In addition to its administrative office in Conway, the bank operated 15 full-service branches and 14 deposit-taking Automated Teller Machines (ATMs). The bank did not open or close any branch offices during the evaluation period, nor were there any mergers or acquisitions.

As of December 31, 2022, the bank had total assets of \$1.8 billion, and net loans and leases of approximately \$641.1 million representing 35.6 percent of total assets. Total deposits were \$1.5 billion, or 83.3 percent of total assets. Real estate loans and commercial loans make up the majority of total net loans. Real estate loans accounted for \$517.4 million, which was 80.7 percent of the total net loans. Commercial loans totaled \$75.7 million, which was 11.8 percent of total net loans. The bank's tier 1 capital was \$155.7 million.

The bank offered a variety of credit and deposit services to businesses and consumers. The bank offered home mortgage loans for the home purchase, home improvement, and home refinance purposes. Long-term residential mortgage loans are provided through the bank's secondary mortgage department which acted in an agency capacity for various investor companies. Financing for commercial customers included, but was not limited to, working capital lines of credit, commercial equipment and vehicle loans, commercial real estate loans and agriculture loans. The bank provided cash management and other specialized conveniences, such as account reconciliation, merchant services, commercial lock box, e-lockbox, and remote deposit capture. In addition, the bank offered a variety of secured and unsecured consumer loan products, including home equity lines of credit and loans, overdraft protection, automobile, home improvement, and personal loans. The bank also offered personal and business credit cards. Deposit products included certificates of deposit, individual retirement accounts, money market,

and various checking and savings accounts for individuals and businesses. Alternative delivery systems included telephone banking, 24-hour ATMs, online banking, and CNB2GO mobile banking which included an application that is compatible with all Apple and Android smartphones.

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 (SBA) Paycheck Protection Program (PPP), which helped businesses keep their workforce employed during the pandemic.

In response to COVID-19, SBA PPP loans under the CARES Act were offered to small businesses throughout the country. SBA's PPP was designed to maintain and stabilize small businesses during the pandemic. CNB's participation in the 1st round (2020) and the 2nd round (2021) resulted in originating 1,899 PPP loans totaling \$104 million which provided much needed funds to support struggling businesses during the pandemic. Positive consideration for response to the pandemic is reflected in respective lending analysis.

There were no financial or legal impediments to hinder the bank's ability to help meet the credit needs of the communities it services. The bank's CRA performance was rated Outstanding in the last public evaluation dated October 26, 2020.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assessed the bank's CRA performance under the Large Bank Lending, Investment, and Service Tests. The evaluation period spanned from January 1, 2020, to December 31, 2022.

In evaluating the bank's lending performance, the OCC reviewed home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA) and small loans to businesses reported under the CRA. All home mortgage products were reviewed, and conclusions reached in the aggregate. CD loans were also reviewed. The bank made a limited number of reportable farm loans during the evaluation period which resulted in the level of small loans to farms not being sufficient to provide a meaningful analysis. No affiliate activity was included in this analysis.

Due to the Census data changing during the evaluation period, we compared 2015 American Community Survey (ACS) Census data to loans originated from January 1, 2020, through December 31, 2021, and 2020 U.S. Census data to loans originated from January 1, 2022, through December 31, 2022.

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 AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating section for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is based solely on its performance in the state of South Carolina, which consists of one AA, the Myrtle Beach -Conway, SC CSA AA. We assigned greater weight on the bank's small business lending as this represented the substantial majority of the bank's lending within the AA.

The MMSA and 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.

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

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 South Carolina

CRA rating for the State of South Carolina: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Low Satisfactory

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Excellent lending activity with a substantial majority of loans made within the AA;
- Excellent geographical distribution of loans;
- Excellent borrower distribution of loans;
- Adequate level of CD investments;
- Retail delivery systems are readily accessible to all portions of the AA; and
- Excellent level of CD services that significantly impacted overall services performance.

Description of Institution's Operations in South Carolina

CNB had delineated one AA within the state of South Carolina. The defined AA included Horry County within the Myrtle Beach-Conway-North Myrtle Beach, SC MSA #34820, and portions of Georgetown County, which is part of the Myrtle Beach-Conway, SC CSA #396. We combined these AA geographies into a single delineated rating area for evaluation. Refer to appendix A for a complete description of the AA. The AA did not arbitrarily exclude low- or moderate-income (LMI) geographies. The bank offered a full range of loan and deposit products and services through 15 full-service branches and 14 deposit taking ATMs in the AA.

According to June 30, 2022, Federal Deposit Insurance Corporation (FDIC) deposit market share data, 21 financial institutions operated 131 full-service offices within the AA. CNB holds \$1.6 billion in deposits inside the AA with a 12.3 percent deposit market share, making it the largest deposit holder in the AA. The five largest institutions including CNB held 50.3 percent of the deposit market.

Economic Data

According to Moody's Analytics Economic Data analysis of the Myrtle Beach-Conway-North Myrtle Beach, SC-NC MSA, as of April 2023, the local economic conditions are strong and the demand for leisure and tourism goods and services is high. Top industries in the area providing the most employment were local and state government, restaurants, and traveler accommodations. The major employers in the Myrtle Beach-Conway-North Myrtle Beach, SC-

NC MSA are Walmart, Coastal Carolina University, Food Lion, Conway Medical Center, and Grand Strand Regional Medical Center. Job growth has slowed. The tourism and leisure industries stimulate the local housing market; however, it is expected that higher mortgage rates will slow down home sales, while new single-family home permitting will decline from current rates. Housing affordability in the MSA is also a challenge. The high volume of low-wage jobs is expected to become a liability for the MSA if housing affordability worsens or retiree in-migration slows.

According to the U.S. Bureau of Labor Statistics (BLS), there was a downward trend in the unemployment rates in the Myrtle Beach-Conway, SC CSA AA. The unemployment rate decreased from 5.1 percent in January 2020 to 4.1 percent in December 2022, which was above the state of South Carolina unemployment rate of 3.2 percent and slightly higher than the national average of 3.5 percent, both as of December 2022.

The U.S. Bureau of Labor Statistics reported the annual average unemployment rate in the AA for 2020, 2021, and 2022, was 8.3 percent, 5.2 percent, and 4.1 percent, respectively. The national annual average unemployment rate for 2020, 2021, and 2022 totaled 8.1 percent, 5.4 percent, and 3.6 percent, respectively. The unemployment rate in the AA exceeded the national annual average in 2020 and 2022, but it was below the national annual average in 2021. The state of South Carolina unemployment rates for 2020, 2021, and 2022, were below the AA rates, reporting an annual average of 6.0 percent, 3.9 percent, and 3.2 percent, respectively.

Community Contacts

The OCC made one community contact in the AA during the evaluation period, a community agency focused on economic development. In addition, we reviewed plans from Georgetown and Horry counties. The community contact and county plans indicated that the following are identified needs within the bank's AA.

- Investments in affordable housing development projects in the area,
- Small business lending to access capital needs,
- Small loans to small businesses particularly to start-up businesses,
- Training and technical assistance to small businesses,
- Investments in manufacturing for rural areas,
- Financial literacy education, specifically to young students,
- Funding for after-school and youth programs,
- Volunteers to serve on boards, committees, and other volunteer opportunities,
- Opening of neighborhood grocery stores in LMI areas,
- Improvement of the transportation system, including bus routes, longer operating hours, and repaying roads.

The following table provides a summary of the demographics that includes housing and business information for the Myrtle Beach-Conway, SC CSA AA.

Table A – Demo Assessment A			f the Assessme nway SC CSA			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	77	2.6	16.9	58.4	18.2	3.9
Population by Geography	314,604	1.9	16.5	64.1	17.2	0.3
Housing Units by Geography	208,571	1.9	10.9	61.5	25.6	0.2
Owner-Occupied Units by Geography	90,255	0.5	13.4	65.4	20.4	0.2
Occupied Rental Units by Geography	38,929	4.4	17.9	62.1	15.3	0.3
Vacant Units by Geography	79,387	2.3	4.5	56.7	36.5	0.1
Businesses by Geography	27,551	4.9	12.9	57.7	23.9	0.6
Farms by Geography	835	1.3	19.3	62.3	16.4	0.7
Family Distribution by Income Level	83,721	19.7	18.2	21.2	40.9	0.0
Household Distribution by Income Level	129,184	22.6	16.0	19.1	42.2	0.0
Median Family Income MSA - 34820 Myrtle Beach-Conway-North Myrtle Beach, SC-NC MSA		\$53,695	5 Median Housing Value			\$191,937
Median Family Income Non-MSAs - SC		\$44,609	Median Gross Rent			\$863
			Families Belov	w Poverty Le	vel	12.5%

Myrtle Beach-Conway, SC Combined Statistical Area (CSA)

Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0%

(*) The NA category consists of geographies that have not been assigned an income classification.

Table A – Demographic Information of the Assessment Area

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	87	3.4	17.2	55.2	21.8	2.3
Population by Geography	378,634	3.3	18.9	60.4	17.4	0.0
Housing Units by Geography	229,077	2.4	14.5	56.2	26.8	0.0
Owner-Occupied Units by Geography	110,797	1.7	15.1	62.1	21.1	0.0
Occupied Rental Units by Geography	37,677	6.3	27.7	52.1	14.0	0.0
Vacant Units by Geography	80,603	1.7	7.5	50.1	40.7	0.0
Businesses by Geography	51,503	6.1	17.9	51.0	25.0	0.0
Farms by Geography	1,302	3.2	18.0	62.4	16.4	0.0
Family Distribution by Income Level	95,291	20.2	18.6	21.1	40.2	0.0
Household Distribution by Income Level	0	0.0	0.0	0.0	0.0	0.0
Median Family Income MSA - 34820 Myrtle Beach-Conway-North Myrtle Beach, SC-NC MSA		\$65,152	Median Housi	ng Value		\$219,31
Median Family Income Non-MSAs - SC		\$53,588	Median Gross	Rent		\$990
			Families Below Poverty Level			9.5%

Assassment Area, Murtle Beach Conway SC CSA 2022

The AA has a relatively high cost of housing that impedes homeownership for LMI individuals and families. The affordability table below illustrated housing affordability calculations for the MSA. The monthly mortgage payment calculations assumed a 30-year mortgage with a five percent interest rate, and no accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses. The maximum low-income and maximum moderate-income annual income calculations were based on 50 percent and 80 percent of the 2022 FFIEC adjusted median family income in the MSA. As the table illustrates, both low- and moderate-income borrowers would be challenged to afford the median home price. Furthermore, there was a very limited number of owner-occupied-units available in CNB's LMI geographies. The population within the low-income census tracts (CT) was 12,482, however, there were just 1,877 owner-occupied units. The population within the moderate-income CTs was 71,487, however, there were 16,736 owner-occupied units.

	2022 Housing Affordability											
MD/MSA	2022	Maximum-	Maximum	Maximum	Maximum	Maximum	Maximum	2022	Mortgage			
Name	Updated	Low-	Affordable	Monthly	Moderate-	Affordable	Monthly	Median	Payment			
	MFI	Income	Mortgage	Mortgage	Income	Mortgage	Mortgage	Home	Based on			
		Annual	Amount	Payment	Annual	Amount	Payment	Sales	Sales			
		Income		-	Income		-	Price	Price			
MSA 34820	77,500	38,750	180,460	969	62,000	288,737	1,550	362,848	1,948			

*Source – National Association of Realtors 2022 median home sales price of existing single-family home for Metropolitan Areas.

Scope of Evaluation in State of South Carolina

The OCC conducted a full-scope review of the Myrtle Beach-Conway, SC CSA AA. There were no limited-scope areas to review. Small business loans were given substantially more weight than home mortgage loans when arriving at the bank's overall lending performance based on the volume of loans. Refer to the table in Appendix A for a complete description of the AA.

CONCLUSIONS IN RESPECT TO PERFORMANCE TESTS IN SOUTH CAROLINA

Lending Test

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Myrtle Beach-Conway, SC CSA AA is excellent.

Lending Activity

Number of Loans 2020-2021 (#)									
Home Small Small Community									
Assessment Area	Mortgage	Business	Farm	Development	Total				
Myrtle Beach Conway SC CSA	818	2,009	63	8	2,898				

Lending levels reflect excellent responsiveness to AA credit needs.

Dollar Volume of Loans 2020-2021 (\$000s)									
Home Small Small Community									
Assessment Area	Mortgage	Business	Farm	Development	Total				
Myrtle Beach Conway SC CSA	141,978	212,068	2,807	3,328	360,181				

Number of Loans 2022 (#)										
Home Small Small Community										
Assessment Area	Mortgage	Business	Farm	Development	Total					
Myrtle Beach Conway SC	314	1,074	28	1	1,417					
CSA										

Dollar Volume of Loans 2022 (\$000s)									
Home Small Small Community									
Assessment Area	Mortgage	Business	Farm	Development	Total				
Myrtle Beach Conway SC CSA	64,094	110,509	1,908	464	176,975				

Based on the FDIC Deposit Market Share data as of June 30, 2022, CNB ranked first among 21 institutions in the market with a 12.3 percent market share.

Based on 2022 peer mortgage data, the bank ranked 17th with a 1.4 percent market share. This rank placed the bank in the top 2.7 percent of all mortgage lenders. Competition for mortgage loans was very strong, as there were 640 other lenders in the AA. There were 69 lenders that originated only one loan during 2022. The top five lenders and their market share were Rocket Mortgage with 5.8 percent, DHI Mortgage Company Limited with 3.9 percent, Movement Mortgage, LLC with 3.5 percent, Truist Bank with 3.3 percent, and PennyMac Loan Services LLC with 3.1 percent.

According to the most recent available 2021 peer small business data, CNB ranked second in small business lending among 116 lenders in the market with a 7.7 percent market share. This rank placed the bank in the top 1.7 percent of all small business lenders. American Express National Bank ranked first with 24.0 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O for 2020-21 and 2022 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.

For the years 2020-2021, the percentage of loans in low-income geographies exceeded both the percentage of owner-occupied units as well as the aggregate distribution of home mortgage loans. The percentage of loans in moderate-income geographies exceeded both the percentage of owner-occupied units as well as the aggregate distribution of home mortgage loans.

For the year 2022, the percentage of loans in low-income geographies exceeded both the percentage of owner-occupied units as well as the aggregate distribution of home mortgage loans. The percentage of loans in moderate-income geographies exceeded both the percentage of owner-occupied units as well as the aggregate distribution of home mortgage loans.

Small Loans to Businesses

Refer to Table Q for 2020-21 and 2022 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 of small loans to businesses. There was no aggregate data for 2022. We placed greater weight on the data from 2020-21.

For the years 2020 through 2021, the percentage of loans in low-income geographies was below the percentage of businesses and the aggregate industry distribution of loans to businesses in those geographies. The percentage of loans in moderate-income geographies exceeded both the percentage of businesses and the aggregate industry distribution of loans to businesses in those geographies.

For the year 2022, the percentage of loans in low-income geographies was below the percentage of businesses in those geographies. The percentage of loans in moderate-income geographics exceeded the percentage of businesses in those geographies.

Lending Gap Analysis

OCC examiners reviewed summary reports and AA maps detailing the bank's lending activity over the evaluation period for home mortgage loans and small loans to businesses to identify any gaps in the geographic distribution of loans. No unexplained conspicuous gaps were identified.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table P for 2020-21 and 2022 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.

For the years 2020-2021, the percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but exceeded the aggregate industry distribution of home mortgage loans to those families. The percentage of home mortgage loans to moderate-income borrowers was below the percentage of moderate-income families and the aggregate industry distribution of home mortgage loans to those families.

For the year 2022, the percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and near to the aggregate industry distribution of home mortgage loans to those families. The percentage of home mortgage loans to moderate-income borrowers was below the percentage of moderate-income families and the aggregate industry distribution of home mortgage loans to those families.

Although the proportion of loans to low-income borrowers was lower than the proportion of lowincome families, the bank and industry performance was greatly impacted due to the relative lack of affordable housing in the AA and the challenges faced by low- and moderate-income borrowers' ability to qualify for a loan based on the median home sales prices.

As discussed in the Description of Institution's Operations in South Carolina section, lowincome borrowers are challenged to afford a mortgage at the median home sales price. See the affordability table for an illustration of the challenges faced by low- and moderate-income borrowers given the median home price in the AA.

As noted in the Lending activity section, there is strong competition in the AA with hundreds of lenders. Despite the number of lenders, the bank is very competitive as seen the Lending activity section.

Small Loans to Businesses

Refer to Table R for 2020-21 and 2022 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 of small loans to businesses. There was no aggregate data for 2022. We placed greater weight on the data for 2020-21.

For 2020-21, the percentage of loans to businesses with gross annual revenue of \$1 million or less was below the percentage of those businesses but exceeded the aggregate industry distribution of loans to those businesses.

For 2022, the percentage of loans to businesses with gross annual revenue of \$1 million or less was below the percentage of those businesses.

Although the percentage of loans was below the percentage of small businesses, the bank ranks in the top 2 percent of all small business lenders in the AA, as previously noted in the Lending Activity section of this evaluation.

Community Development Lending

The institution has made a relatively high level of CD loans.

The Lending Activity Tables, shown below, 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.

Community Development Loans								
Assessment Area			Total					
Assessment Area	#	% of Total #	\$(000's)	% of Total \$				
Myrtle Beach-Conway, SC CSA	9	100.0	3,792	100.0				
Total AA	9	100.0	3,792	100.0				

The bank originated nine CD loans totaling \$3.8 million. CD loan volume was equivalent to 2.4 percent of tier 1 capital. CD lending was responsive to affordable housing needs in the AA. CD lending opportunities were decreased during the evaluation period due to the COVID-19 pandemic. Many businesses were shut down for long periods throughout the evaluation period due to state and city requirements in response to the COVID-19 pandemic as well as lower-cost funding options available through the Paycheck Protection Program.

Product Innovation and Flexibility

The institution makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. We considered the loan programs, which provided opportunities with direct benefit to LMI borrowers and small businesses within the AA.

Paycheck Protection Program

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 1,899 PPP loans totaling \$104 million. In 2020, the bank originated 229 PPP loans totaling \$11.8 million in LMI tracts in the AA. In 2021, the bank

originated 136 PPP loans totaling \$7.2 million in LMI tracts in the AA. This activity received positive consideration, as it provided stabilization of small businesses and helped to support and retain LMI jobs.

INVESTMENT TEST

The bank's performance under the Investment Test in South 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 Myrtle Beach-Conway, SC CSA AA is adequate.

The institution has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits adequate responsiveness to credit and community economic development needs. The institution does not use innovative and/or complex investments to support CD initiatives.

Qualified Investments										
	Pric	or Period*	Curr	ent Period			Total			Unfunded mmitments**
Assessment Area	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Myrtle Beach- Conway SC CSA	2	1,005	86	2,561	88	100.0	3,566	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.

During the evaluation period, the bank made two qualified investments in general obligation bonds totaling approximately \$636,000; and one qualified investment in a FNMA pool of CRA Qualified Mortgages, totaling approximately \$1.9 million. The bank made 83 CD donations and grants totaling \$51,320, representing 0.33 percent of tier 1 capital. Qualified donations were made to organizations focused on community services for LMI individuals and geographies.

The total qualified investments of \$3.6 million represent 2.3 percent of tier 1 capital.

The following are notable examples of the bank's qualified investments and donations:

• Four investments totaling \$1.6 million in the form of municipal bonds issued for construction of school buildings in Horry and Georgetown counties. These bonds provided funding for schools where over fifty percent of students received free or reduced-price lunches.

- Two donations totaling \$10,000 to medical care facilities that provided services targeted to LMI individuals.
- Three donations totaling \$2,050 to a non-profit organization that offers free meals and guidance as needed to break the cycle of poverty.

The bank had two prior period investments in the form of municipal bonds issued for construction of school buildings in Horry and Georgetown counties. These bonds provided funding for schools where over fifty percent of students received free or reduced-price lunches.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Myrtle Beach-Conway, SC CSA AA is excellent.

Retail Banking Services

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

		.]	Distribution	of Brar	nch Deli	ivery Sy	vstem				
	Deposits		I	Branche	es				Pop	ulation	
	% of	# of	% of	Loc	ation of	f Brancł	nes by	% of	f Popula	tion witl	hin Each
	Rated	BANK	Rated	Incor	ne of G	eograph	ies (%)		Geo	graphy	
Assessment	Area	Branches	Area								
Area	Deposits		Branches	Low	Mod	Mid	Upper	Low	Mod	Mid	Upper
	in AA		in AA								
Myrtle											
Beach-	100.0	15	100.0	6.7	33.3	40.0	20.0	3.3	18.9	60.4	17.4
Conway	100.0	15	100.0	0.7	33.5	40.0	20.0	5.5	16.9	00.4	17.4
SC CSA											
Source:2020 U											
Due to rounding	, totals may not	equal 100.0%									

Branches and alternative delivery systems were effective and responsive in helping the bank provide services across the community. One branch was located in a low-income geography. The percentage of branches in low-income geographies exceeded the percentage of population in those geographies. Six branches were located in moderate-income geographies for 2020-2021. Due to the 2020 U.S. Census, one of the six branches in moderate-income geographies was re-assigned as a middle-income geography for 2022. The percentage of branches in moderate-income geographies exceeded the percentage of population in those geographies exceeded the percentage. The bank had three branches in middle-income geographies which were within sufficient proximity to reasonably serve moderate-income geographies. These three branches contributed positively to the branch distribution conclusion.

The bank provided alternative delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, CNB2Go Mobile Banking, and CNB Bill Pay. The bank also provided free check cashing services for government issued checks, such as social security, state, and IRS refunds at no charge to customers and non-customers. In addition, the bank continues to accept and process local electric and water utility payments at no cost to consumers. According to the bank's internal records, the bank processed approximately 240,000 payments during the review period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. The bank maintains standard business hours and offers traditional banking products, mortgages, consumer and small business lending and services at all branch locations in the AA. The bank did not open or close any branches during the evaluation period.

Community Development Services

The institution is a leader in providing CD services.

The bank provided an excellent level of CD services. There were 82 employees actively involved in qualifying CD services during the evaluation period. These employees provided 1,602 hours of financial education, technical assistance, or service on boards of directors and committees of 66 qualified community organizations. Examples of qualifying activities include the following:

- One employee served 240 hours per year for 2020 and 2021 for a total of 480 hours to provide expertise as an Office Accountant for a nonprofit organization in the AA which provided construction and aid programs in the AA.
- A Vice President served 116 hours during the evaluation period, on the board as a treasurer for a nonprofit organization whose mission is to provide new books to children in need in Horry County.
- Twenty-eight employees participated in the 'Teach Children to Save Day", a program sponsored by the American Bankers Association Education Foundation.

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:	January1, 2020 to Decembe	rr 31, 2022
Bank Products Reviewed:	Home Mortgage Loans, and Community Development L Development Services	l Small Business Loans Joans, Qualified Investments, Community
Affiliate(s)	Affiliate Relationship	Products Reviewed
NONE		
List of Assessment Areas and Type o	f Examination	
Rating and Assessment Areas	Type of Exam	Other Information
State:		
South Carolina:		
Myrtle Beach-Conway, SC CSA	Full Scope Review	AA includes all Census tracts in Horry County and census tracts 9205.01, 9205.02, 9205.03, 9205.04, and 9205.05 in Georgetown County.

Appendix B: Summary of State Ratings

	RATINGS – THI	E CONWAY NATIO	ONAL BANK	
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State Rating
	Outstanding	Low Satisfactory	Outstanding	Outstanding
State:				
South Carolina	Outstanding	Low Satisfactory	Outstanding	Outstanding

(*) 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.

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.

	Tota Loai	al Home I ns	Mortga	ge	Low-Incor	ne Trac	ts	Moderate-	Income	Tracts	Middle-In	come T	racts	Upper-Inc	ome Ti	racts	Not Availa Tracts	able-Inc	ome
Assessment Area:	#	\$		Overall Market	Occupied	% Bank Loans	Aggregate		% Bank Loans	Aggregate	Occupied	% Bank Loans	Aggregate	Occupied	% Bank Loans	Aggregate	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate
Myrtle Beach Conway SC CSA	818	141,978	100.0	33,787	0.5	3.2	0.5	13.4	16.0	9.7	65.4	67.4	65.4	20.4	13.3	24.3	0.2	0.2	0.1
Total	818	141,978	100.0	33,787	0.5	3.2	0.5	13.4	16.0	9.7	65.4	67.4	65.4	20.4	13.3	24.3	0.2	0.2	0.1

	Tota Loar	ll Home ns	Mortg	age	Low-Incon	ne Trac	ts	Moderate-	Income	Tracts	Middle-In	come T	racts	Upper-Inc	ome Tr	acts	Not Availa Tracts	ble-Inco	ome
Assessment Area:	#	\$		Overall	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate		% Bank Loans	Aggregate		% Bank Loans			% Bank Loans	Aggregate	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate
Myrtle Beach Conway SC CSA	314	64,094	100.0	21,948	1.7	1.9	1.2	15.1	22.6	13.1	62.1	57.6	63.3	21.1	17.8	22.4	0.0	0.0	0.0
Total	314	64,094	100.0	21,948	1.7	1.9	1.2	15.1	22.6	13.1	62.1	57.6	63.3	21.1	17.8	22.4	0.0	0.0	0.0

	Tota	l Home N	lortgag	e Loans	Low-Inco	me Bori		Moderate Borrower		e	Middle-Ir	ncome B	orrowers	Upper-In	come Bo		Not Avail Borrower		come
Assessment Area:	#	\$		Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans		% Families	% Bank Loans		% Families	% Bank Loans		% Families	% Bank Loans	Aggregate
Myrtle Beach Conway SC CSA	818	141,978	100.0	33,787	19.7	6.4	4.7	18.2	12.2	14.6	21.2	14.3	18.9	40.9	46.2	45.4	0.0	20.9	16.4
Total	818	141,978	100.0	33,787	19.7	6.4	4.7	18.2	12.2	14.6	21.2	14.3	18.9	40.9	46.2	45.4	0.0	20.9	16.4

	Tota	Home I	Mortga	ge Loans	Low-Inco	me Bori		Moderate Borrower		9	Middle-In	icome B	orrowers	Upper-In	come Bo	orrowers	Not Avail Borrower		ome
Assessment Area:	#	\$		Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Myrtle Beach Conway SC CSA	314	64,094	100.0	21,948	20.2	5.1	5.7	18.6	13.1	15.6	21.1	8.9	20.0	40.2	35.0	43.4	0.0	37.9	15.3
Total	314	64,094	100.0	21,948	20.2	5.1	5.7	18.6	13.1	15.6	21.1	8.9	20.0	40.2	35.0	43.4	0.0	37.9	15.3

	Total Busin	Loans to esses	Small		Low-Incom	ie Tract	ts	Moderate-l	Income	Tracts	Middle-Inc	ome T	racts	Upper-Inco	ome Tr	acts	Not Availa	ble-Inco	ome Tract
Assessment Area:	#	\$		Overall Market	% Businesses	% Bank Loans	Aggregate	0/_	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggrogato	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregat
Myrtle Beach Conway SC CSA	<i>,</i>	212,068	100.0	12,622	4.9	3.7	5.0	12.9	19.4	11.9	57.7	59.0	59.8	23.9	17.6	22.8	0.6	0.3	0.5
Total	2,009	212,068	100.0	12,622	4.9	3.7	5.0	12.9	19.4	11.9	57.7	59.0	59.8	23.9	17.6	22.8	0.6	0.3	0.5

	Total Busin	Loans to esses	Small		Low-Incom	e Tract	s	Moderate-l	ncome	Tracts	Middle-Inc	ome Ti	racts	Upper-Inco	me Tr	acts	Not Availab	ole-Inco	me Trac
Assessment Area:	#	\$		Overall Market	% Businesses	% Bank Loans		% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans		% Rusinesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggrega
Myrtle Beach- Conway SC CSA	1,074	110,509	100.0		6.1	5.0		17.9	19.4		51.0	57.5		25.0	18.1		0.0	0.0	
Total	1,074	110,509	100.0		6.1	5.0		17.9	19.4		51.0	57.5		25.0	18.1		0.0	0.0	 }

	Total Loans	to Small Busir	iesses		Businesses wi	ith Revenues <	= 1MM	Businesses wi > 1MM	th Revenues	Businesses wi Not Available	
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Myrtle Beach-Conway SC CSA	2,009	212,068	100.0	12,622	85.9	74.7	45.8	3.9	25.3	10.2	0.0
Fotal	2,009	212,068	100.0	12,622	85.9	74.7	45.8	3.9	25.3	10.2	0.0

	Total Loans	to Small Busi	nesses		Businesses wi	th Revenues <=	= 1MM	Businesses wi 1MM	th Revenues >	Businesses wi Not Available	
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Myrtle Beach-Conway SC CSA	1,074	110,509	100.0		92.3	73.4		2.0	26.6	5.7	0.0
Total	1,074	110,509	100.0		92.3	73.4		2.0	26.6	5.7	0.0