



PUBLIC DISCLOSURE

August 26, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank of Pennsylvania
Charter Number: 249

166 Main Street
Greenville, PA 16125

Office of the Comptroller of the Currency
400 7th Street SW
Washington, D.C. 20219

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 First National Bank of Pennsylvania with respect to the Lending, Investment, and Service Tests:

Performance Levels	First National Bank of Pennsylvania Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	
High Satisfactory			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 overall CRA Performance Evaluation preliminary rating for the bank’s performance under the Lending, Investment, and Service Tests was “Outstanding”; however, the rating was lowered to “Satisfactory” due to the extent and nature of evidence that the bank’s credit practices, during the period of 2017 to 2021, violated the Fair Housing Act (FH Act), Equal Credit Opportunity Act (ECOA), and the North Carolina Unfair and Deceptive Practices Act (NCUDPA), as described in the Discriminatory or Other Illegal Credit Practices section of this document.
- The Lending Test rating is based on performance across all rating areas. The overall “Outstanding” conclusion is a weighted average, based on deposits, with performance in the Pittsburgh CSA, State of Pennsylvania, and State of North Carolina carrying the greatest weight.
- The Investment Test rating is based on performance across all rating areas. The overall “Outstanding” conclusion is a weighted average, based on deposits, with performance in the Pittsburgh CSA, State of Pennsylvania, and State of North Carolina carrying the greatest weight.
- The Service Test rating is based on performance across all rating areas. The overall “High Satisfactory” conclusion is a weighted average, based on deposits, with performance in the Pittsburgh CSA, State of Pennsylvania, and State of North Carolina carrying the greatest weight.

Lending in Assessment Area

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

The bank originated and purchased 85 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	42,028	82.4	8,984	17.6	51,012	10,499,120	74.6	3,579,150	25.4	14,078,270
Small Business	20,999	90.7	2,154	9.3	23,153	2,562,142	87.6	361,793	12.4	2,923,935
Total	63,219	85.0	11,164	15.0	74,383	13,076,425	76.8	3,942,491	23.2	17,018,916

Description of Institution

First National Bank of Pennsylvania (FNB PA or bank) is an interstate bank headquartered in Greenville, Pennsylvania (PA), and is wholly owned by FNB Corporation (FNB Corp.), a one bank holding company headquartered in Pittsburgh, PA. The bank was chartered in February 1864. FNB Corp. has two subsidiaries, First National Insurance Agency (FNIA) and F.N.B. Capital Corporation, LLC (FNBCC). Additionally, FNBCC has a funding commitment to F.N.B. Capital Partners, L.P. (FNBCP), a small business investment company licensed by the Small Business Administration (SBA). FNBCP is not a subsidiary or affiliate of FNB.

The bank provides a full range of commercial banking, consumer banking and wealth management solutions through its subsidiary network. Commercial banking solutions include corporate banking, small business banking, investment real estate financing, government banking, business credit, capital markets and lease financing. The consumer banking segment provides a full line of consumer banking products and services, including deposit products, mortgage lending, consumer lending and a complete suite of mobile and online banking services. The bank's wealth management services include asset management, private banking, and insurance.

The bank's CRA performance was rated "Outstanding" in the last public evaluation dated August 30, 2021. Currently, there are no impediments to FNB PA's ability to help meet the credit needs within its communities.

FNB PA had total assets of \$46 billion as of December 31, 2023. This included total loans and leases of \$32.8 billion that consisted of \$7.3 billion (22.3 percent of loans and leases) in commercial loans, \$994 million (3.0 percent) in other loans, \$22.8 billion (69.5 percent) in real-estate related loans, \$1.7 billion (5.2 percent) in individual loans, and \$13.4 million (0.04 percent) in agricultural loans. Total tier 1 capital as of December 31, 2023, was \$3.8 billion.

FNB PA currently operates 346 branch offices and 409 deposit-taking automated teller machines (ATMs) distributed across 29 AAs in seven states: Maryland (MD), North Carolina (NC), Ohio (OH), Pennsylvania (PA), Virginia (VA), South Carolina (SC), West Virginia (WV), and the District of Columbia (DC). The bank opened 14 branches and closed 45 branches during the evaluation period.

On January 22, 2022, the bank completed a merger with Baltimore based Howard Bancorp, Inc. The Howard branches were added to existing FNBPA AAs. On December 9, 2022, the bank completed the merger with North Carolina based UB Bancorp. The merger added branches in areas that were previously outside of the bank's AA, resulting in the creation of the Goldsboro MSA and New Bern MSA. Other former UB Bancorp branches were added to existing AAs.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The bank's evaluation period is January 1, 2021 through December 31, 2023. We used this evaluation period to conduct analysis and form conclusions for all performance tests associated with this public evaluation, except as noted in the scope of the evaluation in each rating area. For the HMDA analysis and conclusions for lending activity, geographical distribution, and borrower distribution, we consolidated the bank's home purchase, home refinance, home improvement, and multifamily loans. We concluded on all home mortgage and small loans to businesses that met the definition of a primary loan product in the bank's respective AAs. To be considered a primary loan product, there must have been at least 20 loan originations for a specific loan product within a respective AA, throughout the evaluation period. The bank did not make a sufficient amount of small farm loans for a meaningful analysis. An analysis of HMDA loans was not performed in the Goldsboro MSA for the 2023 analysis period or in the Greenville SC CSA for the 2021 and 2022 analysis periods. An analysis of small loans to businesses was not performed in the Asheville MSA for the 2022-2023 analysis period, Goldsboro MSA for the 2023 analysis period, or Greenville SC CSA for the 2022 and 2023 analysis periods. An analysis of small loans to farms was not performed in any of the bank's AAs.

Home mortgage loans and small loans to businesses; community development (CD) loans; qualified investments; and CD and retail services from January 1, 2021 through December 31, 2023 (the evaluation period) were evaluated. Qualifying activities performed in response to the significant impact of the COVID-19 pandemic across the United States were considered in this evaluation. This included consideration of loans made under the SBA's Paycheck Protection Program (PPP) as either small loans to businesses or farms under the borrower and geographic distribution of lending analysis, or as CD loans, depending on their size. The bank originated a substantial volume of PPP loans during the 2021 period. In 2021, the bank originated 9,878 PPP loans totaling \$976.5 million within the bank's AAs.

Due to updated 2020 U.S. Census data and census tract income level designation changes that became effective January 1, 2022, examiners conducted a separate analysis of the bank's lending performance during the January 1, 2021 through December 31, 2021 period (2021 period) and

from the January 1, 2022 through December 31, 2023 period (2022-2023 period). Examiners analyzed the bank's home mortgage lending and small loans to businesses for the 2021 period using the 2015 American Community Survey (ACS) demographic information. For the 2022-2023 period, examiners used the 2020 U.S. Census demographic information.

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 assessment areas 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.

Bank Wide Lending, Deposit, and Branch Distribution						
	Lending		Deposits		Branches	
	%	Rating Area Rank	%	Rating Area Rank	%	Rating Area Rank
Charlotte MMSA	5.1	6	3.6	6	4.6	6
Philadelphia CSA	1.8	8	1.8	8	1.5	8
Pittsburgh CSA	23.6	2	31.1	1	24.3	2
Washington DC CSA	11.2	4	9.9	4	9.5	4
Youngstown MMSA	4.8	7	5.1	5	4.3	7
State of North Carolina	19.0	3	17.6	3	22.5	3
State of Ohio	6.6	5	2.6	7	5.2	5
State of Pennsylvania	27.1	1	27.8	2	26.6	1
State of South Carolina	0.8	9	0.5	9	1.5	9

Ratings

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings.

The Pittsburgh CSA, State of Pennsylvania, and the State of North Carolina carried the greatest weight in the overall conclusions. These three areas represented 67 percent of the bank's lending, with 23.9 percent, 22.7 percent, and 20.5 percent of total lending, respectively. Additionally, these three areas represented 76.6 percent of the bank's deposits, with 27.8 percent, 31.1 percent, and 17.6 percent of deposits, respectively. 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.

Description of Factors Considered Under Each Performance Test

Lending Test

Loan Products Evaluated

Home mortgage and small loans to businesses were evaluated. A statistical analysis was not performed for a loan product if the bank originated or purchased less than 20 loans in the 2021 period or the 2022-2023 period. Small loans to farms are not primary loan products in any of the bank's AAs and there was not a sufficient number of small loans to farms to analyze in any AA.

The analysis included both the number and dollar volume of lending. The analysis of lending, except for CD loans, emphasized the number of loans rather than the dollar volume because it is a better indicator of the number of individuals or businesses served. In AAs where examiners identified differences in performance between loan products, examiners evaluated the products based on the loan mix by number of loans specific to the AA over the evaluation period. Weighting of loan products in determining the bank's performance is described within the narrative comments of each rating area.

Lending Activity

For all rating areas, the bank's lending activity was evaluated by measuring the volume of the bank's lending compared to its size and resources in its AAs. For each applicable loan product in its AAs, the bank's lending market share and rank was compared to its deposit market share and rank to approximate the bank's lending volume relative to its size, lending capacity, and competitive environment. Examiners divided the bank's market rank by the total number of depository institutions or lenders, respectively. This approach considers the differences between the number of insured depository institutions and the number of home mortgage, small business, and small farm lenders within the AA. Examiners leveraged the FDIC's Deposit Market Share reports to determine the bank's deposit market share and rank for AAs in which the bank operated a licensed branch.

Loan Distribution Analysis

Loan distribution analysis compared home mortgage loans and small loans to businesses to demographic and aggregate data under the applicable lending test components. Demographic data is used to determine the reasonableness of a bank's distribution of loans among borrowers of different incomes and across geographies of different income levels. Aggregate data illustrates how the bank's lending performs relative to other lenders in the AA and provides context on the reasonableness of the bank's performance.

For the 2021 period, examiners placed equal weight on the demographic and aggregate distributions. For the 2022-2023 period, examiners placed more emphasis on the geographic and

borrower demographic distribution than on aggregate performance. Geographic and borrower demographic comparators covered both years of the evaluation period whereas home mortgage aggregate comparators included only data for 2023 and small business aggregate comparators included only data for 2022.

Lending performance was aggregated for the 2021 period and the 2022-2023 period to conclude on the bank's overall performance under the lending test for the entire evaluation period. For home mortgage lending, examiners placed more emphasis on the bank's performance in the 2022-2023 period due to a larger volume of loans as opposed to the 2021 period. For small loans to businesses, examiners placed more emphasis on the bank's performance in the 2021 period due to the larger volume of loans as a result of PPP loan originations in 2021.

Geographic and Borrower Distribution

Equal weighting was given to the geographic and borrower distribution components of the lending test unless performance context factors indicated examiners considered one component more than the other.

For the analysis of the bank's geographic distribution of loans, the bank's performance between LMI geographies was weighted equally, unless otherwise noted. In certain AAs, more weight was placed on the bank's performance in LMI geographies if warranted by limited opportunities to lend or other performance context factors. The AAs in which this occurred are identified within the lending test section.

For the home mortgage borrower distribution analysis, the impact that income, poverty levels, and housing costs have on limiting homeownership opportunities of LMI individuals and families was considered. Additionally, the impact of home affordability for LMI borrowers in higher cost areas when comparing the distribution of home mortgage loans to the demographics was considered. In these higher cost markets, it is difficult for LMI borrowers to afford a home as the area's median housing value is typically too high for conventional mortgage loan qualifications.

The bank originated a substantial volume of PPP loans during the 2021 period. In 2021, the bank originated 9,878 PPP loans totaling \$976.5 million within the bank's AAs. Examiners considered those loans that met the Call Report definition of a small loan to businesses as part of the Lending Test as small loans to businesses.

When there were differences in performance between loan products in a specific AA, examiners determined the overall geographic and borrower conclusion by weighting the products based on the loan mix by number of loans over the evaluation period. Weighting by number of loans gives consideration for each lending decision regardless of the loan's dollar amount.

Community Development Loans

Analysis considered the number and dollar volume of CD loans with more positive consideration provided to those loans that were particularly innovative, complex, or responsive to the needs of

the AA. To provide perspective on the relative level of CD lending, the bank's tier 1 capital was allocated to the rating areas and AAs based on the pro rata share of allocated deposits. CD lending could have a positive, neutral, or negative impact on the performance rating, which is described within the narrative comments.

Flexible and Innovative Lending Programs

The bank used the below innovative and/or flexible lending programs to serve AA credit needs during the evaluation. See the Product Innovation and Flexibility section in the rating areas for additional information on how the bank utilized these products.

Federal Housing Administration – FHA

An FHA fixed rate mortgage is a low-down payment option designed to help first-time and experienced homeowners. This mortgage includes a fixed monthly principal and interest payment with a set interest rate for the life of the loan. Less-than-perfect credit is considered.

FNB Home Rehabilitation Program – FHIRP

This mortgage product helps homeowners buy and renovate homes, providing the ability to finance cost of repairs, renovations, or additions. Little-to-no down payment required, no mortgage insurance required, and less-than-perfect credit is considered.

FNB Home Ownership Program – FHOP

FHOP is designed to help strengthen communities by providing an affordable, simple way to buy a home. The program requires little-to-no down payment, no mortgage insurance required, and less-than-perfect credit considered. This product provides the necessary assistance to help first-time and experienced home buyers.

U.S. Department of Agriculture – USDA

A USDA home loan is a mortgage program designed to assist homebuyers without adequate housing and with low-to-average income in qualifying rural and suburban areas. This program helps homebuyers afford housing with low-to-no down payment and reduced mortgage insurance premiums. Requirements include: low minimum cash required to close, up to 100 percent financing available, and eligible closing costs may be financed into the monthly payment.

U.S. Department of Veterans Affairs – VA

Designed to support those who have served in the armed forces to become homeowners at an affordable cost, a VA home loan is available to active-duty military, veterans, reservists, members of the national guard, and certain surviving spouses of veterans. Benefits include little-to-no down payment, no mortgage insurance, and payment assistance. Less-than-perfect credit is considered.

Investment Test

When conducting analysis under the investment test, the CD investments and grants made in each AA were compared to the AA's allocated tier 1 capital. The analysis also included evaluating how responsive the investments and grants were to the needs of the communities and

if there were any impediments to meeting those needs. The volume of investments made during the current evaluation period and those made in prior evaluation periods that remained outstanding were considered. Investments made in a prior period were considered at the book value of the investment as of December 31, 2023.

CD Investments in Broader Statewide or Regional Area

During the evaluation period, the bank made two current period CD investments in a broader statewide or regional area that did not have a purpose, mandate, or function (P/M/F) to serve the bank's rating areas. These CD investments totaled \$5.7 million and supported affordable housing.

Service Test

The review of services during the evaluation period included analyzing the bank's network of branches and deposit-taking ATMs for the availability and effectiveness of delivering retail banking services. The most weight was given to the geographic distribution of bank branches and changes in branch locations. The analysis of the distribution of the bank's retail branches was based on branch and ATM locations as of December 31, 2023. Geography income category classifications were based on the 2020 Census. When applicable, examiners considered changes to the branch distribution in an AA that resulted solely from a geographic income classification changing from the 2015 ACS to the 2020 U.S. Census.

In the full-scope AAs, examiners reviewed branch locations in middle- and upper-income geographies that served and improved access for LMI customers or customers in LMI geographies in one of two ways. Examiners gave positive consideration when a middle- or upper-income branch was "across the street" (less than 1,000 feet) from a LMI geography. Examiners also considered branches in middle- and upper-income geographies that, based on bank prepared data, served customers from LMI geographies when performance exceeded the percentage of deposit households. Examiners considered each middle- and upper-income branch only once in this analysis.

The bank offered alternative delivery systems (ADS) including telephone and online banking, electronic bill pay, mobile banking, and deposit-taking ATMs that increased accessibility for both retail and business customers.

Where the bank opened or closed branches within an AA, the overall impact of the changes was evaluated. If no branches were opened or closed in an AA, examiners did not include that performance element in the analysis.

Examiners specifically focused on differences in branch hours and services in LMI geographies compared to those in middle- and upper-income geographies. Services and products offered at branches were consistent throughout the branch.

The bank's record of providing CD services was evaluated in AAs that received full-scope reviews. The primary consideration was the extent and responsiveness of the bank's CD services

in meeting community needs within its AAs. Examiners gave the most consideration to CD services that addressed critical needs and/or were most impactful to the AA. To determine conclusions, examiners weighed the responsiveness of the activities, the total number of hours volunteered, the expertise of the employees volunteering, and the number of persons served against the bank's capacity to provide those services in each AA.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. § 25.28(c) (March 29, 2024), in determining a national bank's CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC 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:

On February 5, 2024, FNB PA, as successor by merger to Yadkin Bank (acquired March 2017), entered into consent orders with the United States Department of Justice (USDOJ) and the North Carolina Department of Justice (NCDOJ) to settle allegations of redlining violations based on race and ethnicity under the FH Act, ECOA, and the NCUDPA between 2017 and 2021. The consent orders contain FNB PA's denial of the USDOJ and NCDOJ redlining allegations. The consent orders remain effective for five years from the effective date of February 13, 2024.

As part of the consent orders, the bank agreed to submit a community credit needs assessment and remedial plan to the plaintiffs for non-objection, engage an independent third-party to perform an assessment of the bank's fair lending program, provide training to relevant bank staff and officials, add personnel to encourage and develop more lending in MBHCTs in Charlotte and Winston-Salem, open or acquire two new full-service branches located in MBHCTs in the bank's Charlotte assessment area and one new full-service branch located in an MBHCT in the bank's Winston-Salem assessment area, invest \$11.75 million in a loan subsidy fund, and spend at least \$150,000 per year in connection with an outreach plan, outreach, and financial education for residents in MBHCTs. Additionally, the consent order with DOJ requires the bank to spend a minimum of \$1,000,000 over the five-year term on partnerships with organizations providing residents of MBHCTs in its Charlotte and Winston-Salem assessment areas with services related to credit, consumer financial education, homeownership, and foreclosure prevention.

After consideration of the nature, extent, and strength of the evidence of the alleged practices identified in the consent orders; the extent to which the institution had policies and procedures in place to prevent the alleged practices; the extent to which the institution has taken or has committed to take certain corrective action, including voluntary corrective action resulting from self-assessment; and other relevant information, the CRA rating was lowered from "Outstanding" to "Satisfactory."

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.

Multistate Metropolitan Statistical Area Rating

Charlotte MMSA

CRA rating for the Charlotte MMSA¹: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The geographic distribution of the bank's loans was adequate.
- The distribution of the bank's loans among individuals of different income levels and businesses of different sizes was adequate.
- The bank was a leader in making CD loans. CD lending had a positive impact on the Lending Test rating.
- Qualified investments were excellent in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations. The institution occasionally uses innovative and/or complex investments to support CD initiatives.
- Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the bank's AAs.
- The bank provided an adequate level of CD services. CD services were responsive in addressing community needs.

Description of Institution's Operations in Charlotte MMSA

The Charlotte MMSA represents 3.6 percent of deposits, 4.6 percent of branches, and 4.6 percent of all bank loans. Home mortgages represented 63.5 percent, loans to small businesses represented 36.4 percent, and small loans to farms represented 0.1 percent of lending in the AA. FNB PA offers a full range of loan and deposit products and services in its AA through its branches. There are 43 financial institutions in the AA and the three largest represent 94.3 percent of deposits.

The bank's AA in the Charlotte MMSA consists of Iredell, Mecklenburg, Rowan, and Union Counties in North Carolina and York County in South Carolina. The AA meets the requirements of the CRA and does not arbitrarily exclude any LMI geographies. It includes

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.

full counties. Refer to Appendix A: Scope of the Examination – List of Assessment Areas and Type of Examination for the counties used to form the AAs.

Based on FDIC deposit market share data as of June 30, 2023, the bank had \$1.2 billion in deposits representing a 0.3 percent deposit market share and is ranked ninth out of 43 institutions doing business in the AA. The largest depository institutions include Bank of America, National Association (NA), Truist Bank, and Wells Fargo, NA.

The evaluation period considers demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for each analysis period.

Charlotte MMSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Charlotte MMSA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	394	9.4	22.6	31.2	35.5	1.3
Population by Geography	1,747,213	7.8	21.5	33.0	37.4	0.4
Housing Units by Geography	715,816	8.0	22.0	33.2	36.8	0.1
Owner-Occupied Units by Geography	418,161	3.3	17.3	36.0	43.5	0.0
Occupied Rental Units by Geography	235,163	15.2	29.1	28.3	27.2	0.2
Vacant Units by Geography	62,492	12.1	26.3	33.1	28.2	0.2
Businesses by Geography	208,856	7.1	16.9	28.1	47.2	0.7
Farms by Geography	4,493	4.6	16.0	43.8	35.4	0.2
Family Distribution by Income Level	435,774	21.7	16.3	18.5	43.5	0.0
Household Distribution by Income Level	653,324	22.4	15.9	17.3	44.4	0.0
Median Family Income MSA - 16740 Charlotte-Concord-Gastonia, NC-SC MSA		\$64,187	Median Housing Value			\$196,942
			Median Gross Rent			\$919
			Families Below Poverty Level			11.0%
<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>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Charlotte MMSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	485	4.9	26.4	30.9	35.9	1.9
Population by Geography	1,969,407	4.0	26.0	32.8	36.5	0.8
Housing Units by Geography	785,787	4.3	27.3	32.3	35.2	1.0
Owner-Occupied Units by Geography	464,103	1.8	22.7	34.5	40.7	0.3
Occupied Rental Units by Geography	261,731	8.1	34.5	28.9	26.7	1.9
Vacant Units by Geography	59,953	6.4	31.1	30.0	30.3	2.3
Businesses by Geography	340,165	4.2	23.6	27.8	42.6	1.7
Farms by Geography	6,854	2.7	25.4	38.9	32.5	0.5
Family Distribution by Income Level	477,029	20.3	17.4	19.2	43.1	0.0
Household Distribution by Income Level	725,834	21.7	16.7	17.8	43.8	0.0
Median Family Income MSA - 16740 Charlotte-Concord-Gastonia, NC-SC MSA		\$80,486	Median Housing Value			\$255,794
			Median Gross Rent			\$1,143
			Families Below Poverty Level			7.7%
<i>Source: 2020 U.S. Census and 2023 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>						

Charlotte, NC

According to the 2023 Moody’s Analytics report, the MSA strengths included strong migration trends due to a growing technology sector, low cost of living, and low business costs and a highly skilled workforce. The MSA's growth surpassed the regional and national pace by nearly double, with expectations that it will continue to moderate. The 2023 unemployment rate for the MSA was 3.3 percent compared to 4.6 percent in 2021. The leading industries by wage tier included depository credit intermediation, management of companies and enterprises, offices of physicians, and management, scientific, and technical consultation services. Major employers included Atrium Health, Wells Fargo & Company, Walmart, Bank of America Corporation, and Novant Health Inc.

Community Contacts

Examiners reviewed four community contacts completed during the review period with organizations serving the area. These organizations focus on affordable housing, economic development, and community services targeted to LMI individuals. In addition to monetary credit and investment needs, contacts expressed a need for banker involvement in CD services

such as volunteering on nonprofit organization boards and committees, homeownership counseling, financial education, job training programs for youth, providing funding for developer training programs, and investing in CD projects that address small business development, food insecurity, and home repair.

Credit and CD needs identified include:

- Affordable housing for rent and purchase
- Economic development benefitting LMI communities
- Community services targeted to LMI individuals

Opportunities for participation by financial institutions include the following:

- Providing financing for affordable housing projects
- Hiring local youth for jobs and internships and collaborating on workforce development initiatives
- Financial literacy workshops, including homebuyer counseling

Scope of Evaluation in Charlotte MMSA

Examiners conducted a full-scope review of the Charlotte MMSA. The AA was chosen for a full-scope review because it represents all lending, deposits, and branches in the rating area. Home mortgage loans were given more weight than small business loans when arriving at the bank’s overall lending performance based on the volume of loans.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CHARLOTTE MMSA

LENDING TEST

The bank’s performance under the Lending Test in the Charlotte MMSA is rated High Satisfactory.

Based on a full-scope review, the bank’s performance in the Charlotte MMSA was good.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Charlotte MMSA	1,836	1,051	4	28	2,919

Dollar Volume of Loans (\$000s)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Charlotte MMSA	749,150	168,016	847	106,977	1,024,990

Based on the June 30, 2023, FDIC Summary of Deposit Market Share Report, the bank ranked ninth out of 43 FDIC-insured depository institutions (top 22 percent) with a 0.3 percent deposit market share.

For home mortgage loans, the bank's market share of 0.9 percent ranked 27th out of 747 lenders (top four percent). The top three lenders were State Employees' Credit Union with 5.7 percent market share, Rocket Mortgage with 4.9 percent market share, and Bank of America with 4.3 percent market share.

For small loans to businesses, the bank's market share of 0.3 percent ranked 27th out of 177 lenders (top 16 percent). The top three lenders were American Express with 23.3 percent market share, Bank of America with 11.8 percent market share, and JPMorgan Chase Bank with 9.6 percent market share. The top three small business lenders were institutions with large business credit card portfolios with average loan sizes of \$21,000 or less. The bank's average small business loan size was \$206,000. The bank's lending market share equaled the bank's market share for deposits.

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AA. Examiners placed more emphasis on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units and small businesses.

Home Mortgage Loans

Refer to Table O in the Charlotte MMSA 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.

The overall geographic distribution of home mortgage loans was poor.

2021

The percentage of home mortgage loans originated or purchased in low-income geographies was well below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies was well below the percentage of owner-occupied housing units located in those geographies and was below the aggregate percentage of all reporting lenders.

2022-2023

The percentage of home mortgage loans originated or purchased in low-income geographies was well below the percentage of owner-occupied housing units located in those geographies and was significantly below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies was below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table Q in the Charlotte MMSA 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.

The geographic distribution of small loans to businesses was excellent.

2021

The percentage of small loans to businesses originated or purchased in low-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

2022-2023

The percentage of small loans to businesses originated or purchased in low-income geographies was near to both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies approximated both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

Lending Gap Analysis

The OCC reviewed summary reports, maps, and home mortgage and small business lending activity to identify gaps in the geographic distribution of loans in the full-scope AA. The OCC did not identify any unexplained conspicuous gaps in the full-scope area reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an adequate distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

Refer to Table P in the Charlotte MMSA section of Appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was poor. Examiners considered the housing costs in relation to the median family income and the increase in home values during the evaluation period, which limited the affordability for some low-income borrowers.

2021

The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below the percentage of those families and was below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers was well below the percentage of those families and was below the aggregate percentage of all reporting lenders.

2022-2023

The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below the percentage of those families and was below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers was significantly below both the percentage of those families and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table R in the Charlotte MMSA section of Appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was good.

2021

The percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with revenues of \$1 million or less but exceeded the aggregate percentage of all reporting lenders.

2022-2023

The percentage of small loans to businesses with revenues of \$1 million or less was well below the percentage of businesses with revenues of \$1 million or less but exceeded the aggregate percentage of all reporting lenders.

Community Development Lending

The institution was a leader in making CD loans.

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.

The volume of CD lending was excellent and had a positive impact on the Lending Test conclusion. During the evaluation period, the bank originated 28 CD loans totaling \$107 million or 79 percent of allocated tier 1 capital. The bank’s CD loans were responsive to the identified community needs. The institution did not utilize complex or innovative CD loans. By dollar volume, 74 percent funded economic development, 5.4 percent funded revitalization and stabilization efforts, and 20.6 percent funded community services.

Examples of CD loans in the AA include:

- A \$2 million loan to a minority-owned grocery store chain. The purpose of the loan was to support the growth and expansion of the grocery store chain in low-income CTs. The business expansion will create additional LMI jobs and provide a grocery option in low-income CTs.
- A \$1.2 million loan for the purchase of additional warehouse space to support expansion. The company is in a moderate-income CT and the current warehouse employees and salespersons are primarily LMI. The expansion of the business will create additional LMI jobs.
- A \$2.5 million loan for the purchase of a building to relocate an antique mall that will provide more parking spaces for customers than the previous location. The building will provide rentable space to other micro businesses and six jobs for employees making less than 80 percent of the area median income.

Product Innovation and Flexibility

The institution made limited use of innovative and/or flexible lending practices to serve AA credit needs. As shown in the table below, the bank originated or purchased 16 loans under its flexible lending programs totaling \$4.5 million. For a description of these products see the “Innovative and Flexible Product” section of the Overall Description of Institution.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
FHA	4	1,510
FNB Homeownership Program	9	2,270
U.S. Department of Agriculture	1	247
U.S. Department of Veterans Affairs	2	427
Total	16	4,454

INVESTMENT TEST

The institution’s performance under the Investment Test in the Charlotte MMSA is rated Outstanding.

Based on a full-scope review, the institution’s performance in the Charlotte MMSA is excellent.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Charlotte MMSA	9	5,162	81	4,566	90	100	9,728	100	5	869
Total	9	5,162	81	4,566	90	100	9,728	100	5	869

The tables present the data for the entire rating area. The narrative below addresses performance in full-scope areas only.
** 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 bank's financial reporting system.*

The institution has an excellent level of qualified CD investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution occasionally uses innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

The dollar volume of current- and prior- period investments represented 7.2 percent of allocated tier 1 capital. Current period investments included 78 qualifying grants and donations totaling \$316,344 to 28 organizations. By dollar volume, 25.2 percent of these investments funded affordable housing, 10 percent funded economic development, and 64.8 percent funded community services targeted to low- and moderate-income (LMI) individuals.

Examples of community development investments include:

- The bank provided a complex and responsive \$2 million investment in a low-income housing tax credit (LIHTC) and provided financing to support the development of 84 affordable new housing units. The investment supports the new construction of two garden style residential buildings that will include 36 one-bedroom and 48 two-bedroom units. The property will set aside 100 percent of the tax credit units at 30 percent, 50 percent, and 60 percent of area median income.
- A \$2 million investment in a LIHTC fund supporting the development of 84 new affordable housing units for seniors in a single 3 story building. The property will set aside 100 percent of the tax credit units at 30 percent and 60 percent of area median income.
- A \$2.1 million investment in a LIHTC supporting the renovation of 60 affordable new housing units in an opportunity zone.

SERVICE TEST

The institution’s performance under the Service Test in Charlotte MMSA is rated Low Satisfactory.

Based on a full-scope review, the institution's performance in the Charlotte MMSA is adequate.

Retail Banking Services

Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the institution'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	NA
Charlotte MMSA	100.0	16	100.0	0.0	31.3	25.0	43.7	4.0	26.0	32.8	36.5	0.8

The bank has 16 branches within the AA, with no branches in low-income, and five branches in moderate-income census tracts (CT). The bank's distribution of branches in low-income geographies was significantly below the percentage of the population living within those geographies. The bank's distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies.

The bank offered several ADS options including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options which provided additional delivery availability and access to banking services to both retail and business customers. The bank operated 17 deposit-taking ATMs in the AA with 31.3 percent in moderate-income geographies. The bank provided data on customer digital usage. The data analysis had a neutral impact on the Service Test conclusion.

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
Charlotte MMSA	3	0	0	0	1	2

To the extent changes have been made, the institution's opening and closing of branches has generally not affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the evaluation period, the bank opened three branches, with

none being located in low- or moderate-income geographies. The bank did not close any branches during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals. The bank's branches were open from 9:00 a.m. to 5:00 p.m. on Monday through Thursday, and 9:00 a.m. to 6:00 p.m. on Fridays. The branches do not offer Saturday hours.

Community Development Services

The institution provided an adequate level of CD services.

Bank employees provided 85 qualified CD service activities to 26 organizations with 367 qualified hours within this AA during the evaluation period. Leadership was evident through board or committee participation in 24 of these activities with bank executives providing 170 service hours. The bank's assistance was responsive to identified needs in the AA, particularly through addressing affordable housing, community services and increasing homeownership for low-income families.

Service activity examples during the evaluation period include:

- A bank employee provided 82 hours of support by serving on the board of a local chapter of a community service organization. The organization helps meet local health and human service needs, primarily serving LMI individuals. The local chapter fights for the health and financial stability of individuals in the county.
- A bank employee provided 65 hours serving on the board of a local chapter of a nationwide organization that primarily serves LMI individuals. The organization's mission includes fighting for health, education, and financial stability of those in the local community. The organization works to improve the community and its people by uniting partners to meet local health and human service needs. The community development corporation (CDC) works with private, public, and nonprofit partners to boost education, economic mobility, and health resources.
- A bank employee provided 32 hours of service fundraising and serving on the board for an economic development corporation. The organization's mission includes educating and inspiring individuals and families, small businesses, and nonprofit organizations through targeted programs and essential resources designed to leverage empowerment opportunities. The organization partners with a local Department of Health and Human Services to provide programs such as heating assistance and home weatherization targeted to LMI individuals.

Multistate Metropolitan Statistical Area Rating

Philadelphia CSA

CRA rating for the Philadelphia CSA²: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflected good responsiveness to AA credit needs.
- The geographic distribution of the bank's loans was excellent.
- The distribution of the bank's loans among individuals of different income levels and businesses of different sizes was excellent.
- The bank was a leader in making CD loans. CD lending further supported the Outstanding Lending Test rating.
- Qualified investments were excellent in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations. The institution occasionally uses innovative and/or complex investments to support CD initiatives.
- Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the bank's AAs.
- The bank provided an adequate level of CD services. CD services were responsive in addressing community needs.

Description of Institution's Operations in Philadelphia CSA

The Philadelphia CSA represents 1.8 percent of deposits, 1.4 percent of branches, and 1.7 percent of all bank loans. Home mortgages represented 64.8 percent and loans to small businesses represented 35.2 percent of lending in the AA. The bank chose full counties in the AA. FNB PA offers a full range of loan and deposit products and services in its AA through its branches. There are 21 financial institutions in the AA and the three largest represent 69.69 percent of deposits.

The AA in the Philadelphia CSA consists of Berks County in Pennsylvania and Cecil

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.

County in Maryland. During the evaluation period the bank completed the merger with Howard Bank, which resulted in adding Cecil County, MD to the bank’s assessment area in 2021. Counties from the Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MSA and Reading, PA MSA were combined to form the Philadelphia CSA for analysis and conclusions on performance. Cecil County, MD and Berks County, PA were the only two counties combined into the Philadelphia CSA for analysis and conclusions on performance. The AA meets the requirements of the CRA and does not arbitrarily exclude any LMI geographies. Refer to Appendix A: Scope of the Examination – List of Assessment Areas and Type of Examination for the counties used to form the AAs.

The evaluation period considers demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for each analysis period.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Philadelphia CSA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	109	18.3	7.3	56.9	17.4	0.0
Population by Geography	515,925	13.5	5.1	59.5	21.8	0.0
Housing Units by Geography	206,883	13.6	4.9	60.4	21.1	0.0
Owner-Occupied Units by Geography	137,242	6.2	3.9	64.0	25.9	0.0
Occupied Rental Units by Geography	52,798	29.2	7.2	52.5	11.1	0.0
Vacant Units by Geography	16,843	25.2	5.9	56.1	12.8	0.0
Businesses by Geography	41,516	11.1	5.0	58.9	25.0	0.0
Farms by Geography	1,867	1.9	1.5	69.7	26.8	0.0
Family Distribution by Income Level	132,325	21.3	17.3	21.6	39.8	0.0
Household Distribution by Income Level	190,040	24.1	15.7	18.6	41.6	0.0
Median Family Income MSA - 39740 Reading, PA MSA		\$67,696	Median Housing Value			\$174,017
Median Family Income MSA - 48864 Wilmington, DE-MD-NJ		\$80,707	Median Gross Rent			\$868
			Families Below Poverty Level			9.6%
<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>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Philadelphia CSA 2022 - 2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	128	10.2	17.2	52.3	19.5	0.8
Population by Geography	532,574	8.9	14.6	55.2	20.6	0.6
Housing Units by Geography	210,204	8.6	13.5	57.7	20.1	0.0
Owner-Occupied Units by Geography	138,891	3.2	9.6	62.1	25.1	0.0
Occupied Rental Units by Geography	54,791	20.3	23.2	46.3	10.1	0.0
Vacant Units by Geography	16,522	15.8	14.0	58.7	11.5	0.0
Businesses by Geography	50,405	9.2	14.7	52.2	23.9	0.0
Farms by Geography	2,218	1.7	5.9	69.0	23.4	0.0
Family Distribution by Income Level	132,334	20.6	17.6	22.5	39.3	0.0
Household Distribution by Income Level	193,682	23.4	16.1	18.2	42.3	0.0
Median Family Income MSA - 39740 Reading, PA MSA		\$81,425	Median Housing Value			\$193,250
Median Family Income MSA - 48864 Wilmington, DE-MD-NJ		\$93,347	Median Gross Rent			\$988
			Families Below Poverty Level			7.9%
<i>Source: 2020 U.S. Census and 2023 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>						

Philadelphia, PA

According to the 2023 Moody’s Analytics report, the MSA strengths included the number of prestigious educational institutions, its well-developed port, and being a leader for healthcare and medical research. The MSA's payroll gains exceeded national and Northeast numbers, particularly continuous job growth in the healthcare sector. The 2023 unemployment rate was 4.4 percent compared to 5.7 percent in 2021. The leading industries by wage tier included colleges, universities, and professional schools, federal government, management of companies and enterprises, and offices of physicians. Major employers included the University of Pennsylvania Health System, Thomas Jefferson University and TJU Health System, Inc., Children’s Hospital of Philadelphia, Comcast, and Drexel University.

Reading, PA

According to the 2023 Moody’s Analytics report, the MSA strengths included a relatively low cost of living and low business costs as compared to nearby Philadelphia and a strong healthcare presence. The MSA’s job growth had not been as consistent as seen statewide or nationwide, with little growth in the MSA. The 2023 unemployment rate for the MSA was 4.0 percent

compared to 6.2 percent in 2021. The leading industries by wage tier included management of companies and enterprises, offices of physicians, architectural and engineering services, and iron and steel mills and ferroalloy manufacturing. Major employers included East Penn Manufacturing Company, Inc., Tower Health, St. Joseph's Medical Center, Carpenter Technology Corporation, and Supportive Concepts for Families.

Community Contacts

Examiners reviewed three community contacts completed during the review period with organizations serving the area. These organizations focus on affordable housing and community services targeted to LMI individuals. Contacts noted that historically the area had poor economic conditions, but economic conditions have improved leading to low inventory, higher home prices and higher rents. In addition, contacts noted a need for affordable housing and financial literacy programs.

Credit and CD needs identified include:

- Affordable housing for rent and purchase
- Financial literacy classes, including homebuyer counseling
- Serving underbanked and unbanked individuals

Opportunities for participation by financial institutions include the following:

- Providing financing for affordable housing
- Partnering with nonprofit organizations to provide financial literacy classes, including homebuyer counseling
- Serving underbanked and unbanked individuals

Scope of Evaluation in Philadelphia CSA

Examiners conducted a full-scope review of the Philadelphia CSA. The AA was chosen for full-scope review because it represents all of the lending, deposits, and branches in the rating area. Home mortgage loans were given more weight than small business loans when arriving at the bank's overall lending performance based on the volume of loans.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN PHILADELPHIA CSA

LENDING TEST

The bank's performance under the Lending Test in the Philadelphia CSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Philadelphia CSA was excellent.

Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Philadelphia CSA	711	387	0	8	1,106

Dollar Volume of Loans (\$000s)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Philadelphia CSA	128,555	44,642	0	25,501	198,698

Based on FDIC deposit market share data as of June 30, 2023, the bank had \$616 million in deposits representing a 2.5 percent deposit market share and is ranked eighth out of 21 financial institutions doing business in the AA (top 39 percent). The largest depository institutions include Customers Bank and Santander Bank, NA.

For home mortgage loans, the bank's market share of 1.7 percent ranked 16th out of 444 lenders (top four percent). The top three lenders were Diamond Credit Union with 5.5 percent market share, Rocket Mortgage with 4.4 percent market share, and PennyMac Loan Services LLC with 3.9 percent market share.

For small loans to businesses, the bank's market share of 0.8 percent ranked 19th out of 111 lenders (top 18 percent). The top three lenders were American Express with 18.3 percent market share, JPMorgan Chase Bank with 10.3 percent market share, and US Bank with 8.7 percent market share. The top three small business lenders were institutions with large business credit card portfolios with average loan sizes of \$13,000 or less. The bank's average small business loan size was \$154,000.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table O in the Philadelphia CSA 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.

The overall geographic distribution of home mortgage loans was excellent.

2021

The percentage of home mortgage loans originated or purchased in low-income geographies exceeded both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies exceeded both the percentage of

owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

2022-2023

The percentage of home mortgage loans originated or purchased in low-income geographies exceeded both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies exceeded both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table Q in the Philadelphia CSA 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.

The geographic distribution of small loans to businesses was excellent.

2021

The percentage of small loans to businesses originated or purchased in low-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

2022-2023

The percentage of small loans to businesses originated or purchased in low-income geographies was near to the percentage of businesses located in those geographies but exceeded the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

Lending Gap Analysis

The OCC reviewed summary reports, maps, and home mortgage and small business lending activity to identify gaps in the geographic distribution of loans in the full-scope AA. The OCC did not identify any unexplained conspicuous gaps in the full-scope area reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

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

The distribution of home mortgage loans among individuals of different income levels was excellent. Examiners considered the housing costs in relation to the median family income and the increase in home values during the evaluation period, which limited the affordability for low-income borrowers.

2021

The percentage of home mortgage loans originated or purchased to low-income borrowers was well below the percentage of those families but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded the percentage of those families and approximated the aggregate percentage of all reporting lenders.

2022-2023

The percentage of home mortgage loans originated or purchased to low-income borrowers was well below the percentage of those families but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table R in the Philadelphia CSA section of Appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was excellent.

2021

The percentage of small loans to businesses with revenues of \$1 million or less approximated the percentage of businesses with revenues of \$1 million or less and significantly exceeded the aggregate percentage of all reporting lenders.

2022-2023

The percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with revenues of \$1 million or less but exceeded the aggregate percentage of all reporting lenders.

Community Development Lending

The institution was a leader in making CD loans.

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.

The volume of CD lending was excellent and further supported the overall Outstanding Lending Test conclusion. During the evaluation period, the bank originated eight CD loans totaling \$25.5 million or 37.4 percent of allocated tier 1 capital. The bank's CD loans were responsive to economic development community needs. The institution did not utilize complex or innovative CD loans. By dollar volume, 84 percent funded economic development and 16 percent funded affordable housing.

The following examples demonstrate the bank's use of responsive CD loans:

- A \$4.1 million loan to a nonprofit redevelopment authority to provide access to federal, state, and local funds for community redevelopment and housing rehabilitation. The purpose of the loan was to finance repairs, replacements and improvements to subject properties located in low-income geographies. The authority was formed to assist low-income families in need of home repair or replacement of home systems or items.
- A \$5 million loan to acquire and place a vacant industrial property into productive reuse and support economic development and revitalization. The new store will create 13 new LMI jobs in both part-time and full-time capacities.
- The bank's participation in the PPP resulted in two CRA qualified SBA loans totaling \$3.2 million. These loans were made for a qualified CD purpose and/or to nonprofits providing CD activities and services in the AA.

Product Innovation and Flexibility

The institution used innovative and/or flexible lending practices to serve AA credit needs. As shown in the table below, the bank originated or purchased 86 loans under its flexible lending programs totaling \$15 million. For a description of these products see the "Innovative and Flexible Product" section of the Overall Description of institution.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
FHA	11	2,291
FNB Homeownership Program	67	10,997
Home Possible Freddie Mac	2	227
Home Ready Fannie Mae	2	390
U.S. Department of Agriculture	1	293
U.S. Department of Veterans Affairs	3	775
Total	86	14,973

INVESTMENT TEST

The institution’s performance under the Investment Test in the Philadelphia CSA is rated Outstanding.

Based on a full-scope review, the institution’s performance in the Philadelphia CSA is excellent.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Philadelphia CSA	7	3,327	5	1,705	12	100	5,032	100	0	0
Total	7	3,327	5	1,705	12	100	5,031	100	0	0

The tables present the data for the entire rating area. The narrative below addresses performance in full-scope areas only.
** 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 bank's financial reporting system.*

The institution has an excellent level of qualified CD investment 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 occasionally uses innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

The dollar volume of current- and prior- period investments represented 7.4 percent of allocated tier 1 capital. Current period investments included three qualifying grants and donations totaling \$4,500 to three organizations. By dollar volume, 22.2 percent of these investments funded affordable housing, and 77.8 percent funded community services targeted to LMI individuals.

Examples of community development investments include:

- A \$1.5 million investment to a community development financial institution (CDFI) that assists LMI residents in obtaining residential mortgage and home improvement loans in Berks County, PA.
- A \$1 million investment to a CDFI fund that supports business ownership, housing, and community development for the benefit of low-income people.
- The purchase of four mortgage-backed security (MBS) pool investments totaling \$2.3 million. The investments include home mortgage loans to LMI individuals and/or home mortgage loans located in LMI geographies within the AA. The MBSs provided 64 affordable units.

SERVICE TEST

The institution’s performance under the Service Test in the Philadelphia CSA is rated Low Satisfactory.

Based on a full-scope review, the institution’s performance in the Philadelphia CSA is adequate.

Retail Banking Services

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

Distribution of Branch Delivery System												
Assessment Area	Deposits % of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Branches				Population				
				Location of Branches by Income of Geographies (%)				% of Population within Each Geography				
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp	NA
Philadelphia CSA	100.0	5	100.0	0.0	40.0	60.0	0.0	8.9	14.6	55.2	20.6	0.6

The bank has five branches within the AA, with no branches in low-income CTs and two in moderate-income CTs. The bank’s distribution of branches in low-income geographies was significantly below, but in moderate-income geographies exceeded the percentage of the population living within those geographies.

The bank offered several ADS options including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options which provided additional delivery availability and access to banking services to both retail and business customers. The bank operated five deposit-taking ATMs in the AA, all located at the branches. The bank provided data on customer digital usage. The data analysis had a neutral impact on the Service Test conclusion.

The bank did not open or close branches in the AA during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals. Branches were open from 9:00 a.m. to 5:00 p.m. Monday through Thursday, 9:00 a.m. to 6:00 p.m. on Fridays, and 9:00 a.m. to 12:00 p.m. on Saturday.

Community Development Services

The institution provided an adequate level of CD services.

Bank employees provided 43 qualified CD service activities to two organizations with 423 qualified hours within this AA during the evaluation period. Leadership was evident through board or committee participation in 34 of these activities with bank executives providing 372 service hours. The bank's assistance was responsive to identified needs in the AA, particularly through access to affordable housing in the LMI tracks and a focus on providing assistance to single mothers that do not hold a high school diploma.

Service activity examples during the evaluation period include:

- Two bank employees provided 61 hours as part of the committee tasked with reviewing financial terms used for the organizations budget. They also provided training and orientation to new board members. The organization's mission included assisting LMI adults with literacy training and offering English as a Second Language courses. The organization partners with surrounding businesses to offer corporate training programs. Volunteers can serve as literacy tutors for adults in the area as well as computer literacy tutors.
- A bank employee provided 33 hours serving on the board of a local chapter of a nationwide organization that provides community services. The employee reviewed and planned budgets and worked on impact spending plans. The organization's mission includes efforts that help LMI individuals and families access stable housing, gain job skills, and build financial literacy.

Multistate Metropolitan Statistical Area Rating

Pittsburgh CSA

CRA rating for the Pittsburgh CSA³: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The geographic distribution of the bank's loans was good.
- The distribution of the bank's loans among individuals of different income levels and businesses of different sizes was adequate.
- The bank was a leader in making CD loans. CD lending had a positive impact on the Lending Test rating.
- Qualified investments were excellent in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations. The institution occasionally uses innovative and/or complex investments to support CD initiatives.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs.
- The bank was a leader in providing CD services. CD services were responsive in addressing community needs.

Description of Institution's Operations in Pittsburgh CSA

The Pittsburgh CSA represents the largest AA for the entire bank with 31.1 percent of deposits, 24.3 percent of branches, and 22.7 percent of all bank loans. Home mortgages represented 65.1 percent, loans to small businesses represented 34.7 percent, and small loans to farms represented 0.1 percent of lending in the AA. The bank chose full counties in the AA. The AA meets the requirements of the CRA and does not arbitrarily exclude any LMI geographies. FNB PA offers a full range of loan and deposit products and services in its AA through its branches. There are 58 financial institutions in the AA and the three largest represent 72 percent of deposits.

The Pittsburgh CSA AA consists of Jefferson County in Ohio; Allegheny, Armstrong,

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.

Beaver, Butler, Fayette, Indiana, Lawrence, Washington, and Westmoreland Counties in Pennsylvania; and Brooke County in West Virginia. The Pittsburgh, PA MSA, Weirton-Steubenville, WV-OH MSA, and two non-MSA counties were combined to form the Pittsburgh CSA for analysis and conclusions on performance. Refer to Appendix A: Scope of the Examination – List of Assessment Areas and Type of Examination for the counties used to form the AAs.

The evaluation period considers demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information for each analysis period.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Pittsburgh CSA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	791	8.2	23.0	46.5	20.2	2.0
Population by Geography	2,627,701	4.8	19.2	50.3	25.1	0.7
Housing Units by Geography	1,227,493	5.6	21.0	50.4	22.9	0.2
Owner-Occupied Units by Geography	769,292	2.6	16.5	53.6	27.3	0.0
Occupied Rental Units by Geography	330,714	10.4	28.0	44.8	16.4	0.4
Vacant Units by Geography	127,487	11.3	30.0	45.3	13.0	0.3
Businesses by Geography	250,808	4.9	15.7	43.2	35.3	0.8
Farms by Geography	6,350	2.0	12.5	59.6	25.8	0.1
Family Distribution by Income Level	682,042	21.0	17.4	20.7	40.8	0.0
Household Distribution by Income Level	1,100,006	25.2	15.5	17.1	42.2	0.0
Median Family Income MSA - 38300 Pittsburgh, PA MSA		\$69,624	Median Housing Value			\$133,073
Median Family Income MSA - 48260 Weirton-Steubenville, WV-OH MSA		\$52,770	Median Gross Rent			\$740
Median Family Income Non-MSAs - PA		\$56,172	Families Below Poverty Level			8.8%
<i>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.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Pittsburgh CSA 2022 - 2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	806	6.9	22.8	44.7	22.6	3.0
Population by Geography	2,628,054	4.9	19.6	45.1	29.4	1.0
Housing Units by Geography	1,253,341	5.6	22.1	45.9	25.8	0.6
Owner-Occupied Units by Geography	785,932	2.5	18.5	49.0	29.8	0.2
Occupied Rental Units by Geography	340,416	10.7	27.4	40.2	20.3	1.5
Vacant Units by Geography	126,993	10.7	29.8	42.2	16.2	1.0
Businesses by Geography	299,823	5.5	16.3	39.9	36.6	1.7
Farms by Geography	7,679	2.2	15.2	54.9	27.3	0.4
Family Distribution by Income Level	674,354	20.2	18.1	21.3	40.4	0.0
Household Distribution by Income Level	1,126,348	24.9	15.7	17.5	41.8	0.0
Median Family Income MSA - 38300 Pittsburgh, PA MSA		\$82,642	Median Housing Value			\$162,088
Median Family Income MSA - 48260 Weirton-Steubenville, WV-OH MSA		\$61,496	Median Gross Rent			\$861
Median Family Income Non-MSAs - PA		\$65,202	Families Below Poverty Level			7.1%
<i>Source: 2020 U.S. Census and 2023 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.</i>						

Pittsburgh, PA

According to the 2023 Moody's Analytics report, the MSA strengths included a relatively low cost of living compared to other large Northeast cities, low employment volatility, and top education and research institutions. The MSA's job growth was below the state's and other northeastern cities, with the exception of manufacturing jobs, which quadrupled in growth when compared to the national average. The 2023 unemployment rate for the MSA was 4.0 percent compared to 6.1 percent in 2021. The leading industries by wage tier included management of companies and enterprises, offices of physicians, federal government, computer systems design and related services, and local government. Major employers included UPMC Health System, Highmark Health, University of Pittsburgh, PNC Bank, and Giant Eagle, Inc.

Weirton, WV

According to the 2023 Moody's Analytics report, the MSA strengths included a relatively low cost of living and low business costs and a concentration of healthcare facilities. The MSA's growth was flat in part due to continual migration of residents out of the MSA and weakened demand for manufacturing jobs due to factory closings. The 2023 unemployment rate for the

MSA was 5.2 percent compared to 6.4 percent in 2021. The leading industries by wage tier included electric power generation, transmission, and distribution, coating, engraving, heat treating, and allied activities, nonresidential building construction, and utility system construction. Major employers included Trinity Medical Center, Mountaineer Park, Inc., Weirton Medical Center, Bechtel Construction Company, and Cleveland Cliffs.

Community Contacts

Examiners reviewed four community contacts completed during the review period with organizations serving the area. These organizations focus on affordable housing, economic development, revitalization and stabilization efforts, and community services targeted to LMI individuals. Contacts noted that the regional economy is strong and has grown. They noted a need for affordable housing, economic development, and financial literacy classes. They also identified opportunities including educating small business owners on the commercial loan qualification process and serving underbanked areas.

Credit and CD needs identified include:

- Economic development benefitting LMI communities
- Affordable housing for rent or purchase
- Financial literacy classes for LMI Individuals

Opportunities for participation by financial institutions include the following:

- Providing unsecured loans from \$10,000 to \$50,000 to help individuals start a new small business
- Financing affordable housing projects
- Providing financial literacy classes, including educating small business owners on commercial loan qualifications

Scope of Evaluation in Pittsburgh CSA

Examiners conducted a full-scope review of the Pittsburgh CSA. The AA was chosen as a full-scope area because it represents all of the lending, deposits, and branches in the rating area. Home mortgage loans were given more weight than small business loans when arriving at the bank's overall lending performance based on the volume of loans.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN PITTSBURGH CSA

LENDING TEST

The bank's performance under the Lending Test in the Pittsburgh CSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Pittsburgh CSA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Pittsburgh CSA	9,357	4,990	21	91	14,459

Dollar Volume of Loans (\$000s)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Pittsburgh CSA	1,639,345	619,544	1,602	461,563	2,722,054

Based on the June 30, 2023 FDIC Summary of Deposit Market Share Report, the bank ranked fifth out of 58 FDIC-insured depository institutions (top nine percent) with a 4.7 percent deposit market share. The largest depository institutions include PNC Bank and BNY Mellon.

For home mortgage loans, the bank's market share of 4.2 percent ranked fourth out of 630 lenders (top one percent). The top three lenders were PNC Bank with 7.8 percent market share, CBNA with 7 percent market share, and Dollar Bank with 4.7 percent market share.

For small loans to businesses, the bank's market share of 1.6 percent ranked 13th out of 166 lenders (top eight percent). The top three lenders were American Express with 21.5 percent market share, JPMorgan Chase Bank with 12.6 percent market share, and PNC Bank with 9.5 percent market share. The top two small business lenders were institutions with large business credit card portfolios with average loan sizes of \$13,000. The bank's average small business loan size was \$167,000.

Distribution of Loans by Income Level of the Geography

The bank exhibited good geographic distribution of loans in its AA. Examiners generally placed more emphasis on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units and small businesses.

Home Mortgage Loans

Refer to Table O in the Pittsburgh CSA 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.

The overall geographic distribution of home mortgage loans was good.

2021

The percentage of home mortgage loans originated or purchased in low-income geographies was significantly below the percentage of owner-occupied housing units located in those geographies but was near to the aggregate percentage of all reporting lenders. The percentage of home

mortgage loans originated or purchased in moderate-income geographies was below the percentage of owner-occupied housing units located in those geographies but was near to the aggregate percentage of all reporting lenders.

2022-2023

The percentage of home mortgage loans originated or purchased in low-income geographies was well below the percentage of owner-occupied housing units located in those geographies but was below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies was below the percentage of owner-occupied housing units located in those geographies but was near to the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table Q in the Pittsburgh CSA 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.

The geographic distribution of small loans to businesses was good.

2021

The percentage of small loans to businesses originated or purchased in low-income geographies was below the percentage of businesses located in those geographies but equaled the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies approximated the percentage of businesses located in those geographies and exceeded the aggregate percentage of all reporting lenders.

2022-2023

The percentage of small loans to businesses originated or purchased in low-income geographies was significantly below the percentage of businesses located in those geographies and was well below the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies approximated the percentage of businesses located in those geographies and equaled the aggregate percentage of all reporting lenders.

Lending Gap Analysis

The OCC reviewed summary reports, maps, and home mortgage and small business lending activity to identify gaps in the geographic distribution of loans in the full-scope AA. The OCC did not identify any unexplained conspicuous gaps in the full-scope area reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited adequate distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

Refer to Table P in the Pittsburgh CSA section of Appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was adequate. Examiners considered the housing costs in relation to the median family incomes and the increase in home values during the evaluation period, which limited the affordability for low-income borrowers.

2021

The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below the percentage of those families and was below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers was near to the percentage of those families and was below the aggregate percentage of all reporting lenders.

2022-2023

The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below the percentage of those families and was below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers was near to the percentage of those families and was below the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table R in the Pittsburgh CSA section of Appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was good.

2021

The percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with revenues of \$1 million or less but exceeded the aggregate percentage of all reporting lenders.

2022-2023

The percentage of small loans to businesses with revenues of \$1 million or less was well below the percentage of businesses with revenues of \$1 million or less but exceeded the aggregate percentage of all reporting lenders.

Community Development Lending

The institution was a leader in making CD loans.

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.

The volume of CD lending was excellent and had a positive impact on the Lending Test performance. During the evaluation period, the bank originated 91 CD loans totaling \$461.6 million or 39.4 percent of allocated tier 1 capital. The bank's CD loans were responsive to community needs. The institution did not utilize complex or innovative CD loans. By dollar volume, 37.4 percent funded economic development, 8.2 percent funded affordable housing, 41.5 percent funded revitalization and stabilization efforts, and 12.9 percent funded community services.

The following examples demonstrate the bank's use of responsive CD loans:

- A \$1.3 million loan to an independent nonprofit for the purpose of purchasing and renovating a commercial property into a new headquarters and training center. The organization's mission focuses on removing structural poverty barriers to workforce training and education to improve overall community development and investment.
- A \$6.7 million construction loan to a nonprofit to support the acquisition and renovation of a 51-unit LIHTC affordable housing project in a low-income geography. All the units will continue to benefit from Section 8 subsidies and are restricted to senior households earning 50 percent or less of area median income.
- Two loans for \$10 million and \$5 million, respectively, were originated to a local housing authority for the replacement, revitalization, and improvement of an affordable housing project located in a low-income geography. Phase 1 of the project included infrastructure improvements and the construction of 54-units of affordable housing in 19 buildings. Phase 2 of the project included the new construction of 51-units of affordable housing. All units are restricted to LMI households at 80 percent of area median income. The loans were part of a complex financing package that consisted of multiple sources, including LIHTCs, and state and county financing.
- The bank's participation in the PPP resulted in 45 CRA qualified SBA loans totaling \$63.9 million. These loans were made for a qualified CD purpose and/or to nonprofits providing CD activities and services in the AA.

Product Innovation and Flexibility

The institution made extensive use of innovative and/or flexible lending practices to serve AA credit needs. As shown in the table below, the bank originated or purchased 376 loans under its flexible lending programs totaling \$53.3 million. For a description of these products see the "Innovative and Flexible Product" section of the Overall Description of institution.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
FHA	31	6,054
FNB Home Rehabilitation Program	4	690
FNB Homeownership Program	285	36,675
Home Possible Freddie Mac	14	2,055
Home Ready Fannie Mae	14	2,046
U.S. Department of Agriculture	17	3,216
U.S. Department of Veterans Affairs	11	2,548
Total	376	53,284

INVESTMENT TEST

The institution's performance under the Investment Test in Pittsburgh CSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Pittsburgh CSA is excellent.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Pittsburgh CSA	38	42,088	314	67,848	352	100	109,936	100	9	2,105
Total	38	42,088	314	67,848	352	100	109,936	100	9	2,105

The tables present the data for the entire rating area. The narrative below addresses performance in full-scope areas only.

** 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 bank's financial reporting system.*

The institution has an excellent level of qualified CD investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution occasionally uses innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

The dollar volume of current- and prior- period investments represent 9.4 percent of allocated tier 1 capital. Current period investments included 290 qualifying grants and donations totaling \$3.7 million to 171 organizations. By dollar volume, 13.2 percent of these investments funded affordable housing, 13.9 percent funded economic development, 19.4 percent funded revitalization and stabilization efforts, and 53.5 percent funded community services targeted to LMI individuals.

Examples of community development investments include:

- The bank provided a complex and responsive \$5 million investment in a LIHTC and provided financing to support the development of 54 affordable housing units at 80 percent area median income. The project supported the new construction of six one-bedroom flats, 34 two-bedroom townhomes, 12 three-bedroom townhouses and two four-bedroom townhouses.
- The bank provided a complex and responsive \$5.2 million investment in a LIHTC and provided financing to support the renovation of 52 section 8 affordable housing units. The project supports the renovation of studio and one-bedroom units in a six-story building. The bank provided the loan to assist in the completion of the project after increased construction costs affected the completion of the work.
- The bank provided a complex and responsive \$4.9 million investment in a LIHTC and provided financing to support the development of 99 affordable housing units. The property will set aside the tax credit units at 20 percent, 30 percent, 50 percent, and 60 percent of area median income.

SERVICE TEST

The institution’s performance under the Service Test is rated Outstanding.

Based on a full-scope review, the institution’s performance in the Pittsburgh CSA is excellent.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution’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	NA	Low	Mod	Mid	Upp	NA
Pittsburgh CSA	100.0	84	100.0	8.3	15.5	35.7	39.3	1.2	4.9	19.6	45.1	29.4	1.0

The bank has 84 branches within the AA, with seven branches in a low-income CTs and 13 branches in moderate-income CTs. The bank’s distribution of branches in low-income geographies exceeded, and in moderate-income geographies was below the percentage of the population living within those geographies. Within the AA, ten branches in middle- and upper-income geographies were in close proximity to serve LMI areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in LMI areas. These branches had a positive impact on the service delivery system conclusion.

The bank offered several ADS options including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options which provided additional delivery availability and access to banking services to both retail and business customers. The bank operated 109 deposit-taking ATMs in the AA with 8.3 percent in low-income geographies and 15.5 percent in moderate-income geographies. The bank provided data on customer digital usage. The data analysis had a neutral impact on the Service Test conclusion.

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
Pittsburgh CSA	3	10	0	-2	-6	1

To the extent changes have been made, the institution’s opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the evaluation period, the bank opened three branches, with none being in LMI geographies. The bank closed ten branches including two in moderate-income, six in middle-income, and one in upper-income geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. Branches were generally open from 9:00 a.m. to 5:00 p.m. on Monday through Thursday, 9:00 a.m. to 6:00 p.m. on Fridays, and 9:00 a.m. to 12:00 p.m. on Saturday. Of the 49 branches that do offer Saturday hours, one was located in a low-income geography and two were located in a moderate-income geography.

Community Development Services

The institution is a leader in providing CD services.

Bank employees provided 147 qualified CD service activities to 36 organizations with 1,212 qualified hours within this AA during the evaluation period. Leadership was evident through board or committee participation in 141 of these activities with FNB executives providing 576.8 service hours. The bank’s assistance was responsive to identified needs in the AA, particularly through addressing the housing needs of LMI households and providing access to homeowner assistance programs.

Service activity examples during the evaluation period include:

- A bank employee provided 64 hours serving on the board of an organization as a committee member. The employee used their financial expertise serving as a part of the loan and finance committee. The organization’s mission includes a commitment to building college prep for

local students to assist in breaking the cycle of generational poverty by empowering youth and preparing them for college and citizenship.

- A bank employee provided 33 hours serving on the board of a local organization that assists in various areas of business-building, focusing on developing underserved areas where business revitalization is a critical goal. The employee served on both the loan committee and the governance committee.
- Two bank employees provided 30 hours to support to a local organization whose vision includes fostering education and helping families reach their potential in the community. The employees used their financial expertise by serving on the board and finance committees that provide health and human services to children, youth, and families.

Multistate Metropolitan Statistical Area Rating

Washington DC CSA

CRA rating for the Washington DC CSA⁴: Outstanding

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The geographic distribution of the bank's loans was adequate.
- The distribution of the bank's loans among individuals of different income levels and businesses of different sizes was adequate.
- The bank was a leader in making CD loans. CD lending had a positive impact on the Lending Test rating.
- Qualified investments were excellent in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations. The institution occasionally uses innovative and/or complex investments to support CD initiatives.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs.
- The bank provided an adequate level of CD services. CD services were responsive in addressing community needs.

Description of Institution's Operations in Washington DC CSA

The Washington DC CSA represents the second largest AA for the entire bank with 9.9 percent of deposits, 9.5 percent of branches, and 12.1 percent of all bank loans. Home mortgages represented 69 percent, loans to small businesses represented 30.9 percent, and small loans to farms represented less than 0.1 percent of lending in the AA. The bank chose full counties in the AA. FNB PA offers a full range of loan and deposit products and services in its AA through its branches. There are 77 financial institutions in the AA and the three largest represent 51.1 percent of deposits.

The bank's AA in the Washington DC CSA consists of District of Columbia County in

⁴This 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.

Washington DC; Ann-Arundel, Baltimore, Harford, Howard, Queen Anne's, Baltimore City, and Montgomery Counties in Maryland; and Fairfax County Virginia. The Baltimore-Columbia-Towson, MD MSA and Washington-Arlington-Alexandria, DC-VA-MD-WV MMSA were combined to form the Washington DC CSA for analysis and conclusions on performance. The AA meets the requirements of the CRA and does not arbitrarily exclude any LMI geographies. Refer to Appendix A: Scope of the Examination – List of Assessment Areas and Type of Examination for the counties used to form the AAs.

The evaluation period considers demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for each analysis period.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Washington DC CSA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,297	13.0	19.5	31.0	34.4	2.1
Population by Geography	5,396,439	10.4	19.1	32.8	36.7	1.0
Housing Units by Geography	2,178,781	11.4	19.6	33.1	35.3	0.6
Owner-Occupied Units by Geography	1,258,444	5.0	15.2	34.7	44.8	0.2
Occupied Rental Units by Geography	748,844	18.8	26.1	31.8	22.2	1.2
Vacant Units by Geography	171,493	25.6	23.3	27.0	23.1	0.9
Businesses by Geography	655,250	5.6	16.2	34.5	42.9	0.8
Farms by Geography	9,797	3.3	14.0	35.6	46.9	0.2
Family Distribution by Income Level	1,283,130	22.2	16.0	19.1	42.7	0.0
Household Distribution by Income Level	2,007,288	24.4	15.3	17.5	42.8	0.0
Median Family Income MSA - 12580 Baltimore-Columbia-Towson, MD MSA		\$87,788	Median Housing Value			\$380,979
Median Family Income MSA - 23224 Frederick-Gaithersburg-Rockville, MD		\$112,655	Median Gross Rent			\$1,404
Median Family Income MSA - 47894 Washington-Arlington-Alexandria, DC-VA-MD-WV		\$106,105	Families Below Poverty Level			7.0%
<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>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Washington DC CSA 2022 - 2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,392	10.9	20.1	31.1	35.6	2.3
Population by Geography	5,573,534	8.5	20.3	33.1	36.9	1.1
Housing Units by Geography	2,225,811	9.9	20.9	33.0	35.5	0.7
Owner-Occupied Units by Geography	1,298,266	4.5	16.6	34.8	43.9	0.3
Occupied Rental Units by Geography	763,038	16.5	27.4	31.5	23.3	1.2
Vacant Units by Geography	164,507	21.6	24.9	25.5	26.1	1.9
Businesses by Geography	847,126	5.5	18.4	34.1	41.2	0.9
Farms by Geography	12,487	3.4	15.8	35.6	44.8	0.5
Family Distribution by Income Level	1,304,815	21.6	16.0	19.7	42.7	0.0
Household Distribution by Income Level	2,061,304	24.3	15.4	17.8	42.6	0.0
Median Family Income MSA - 12580 Baltimore-Columbia-Towson, MD MSA		\$104,637	Median Housing Value			\$430,775
Median Family Income MSA - 23224 Frederick-Gaithersburg-Rockville, MD		\$129,092	Median Gross Rent			\$1,582
Median Family Income MSA - 47894 Washington-Arlington-Alexandria, DC-VA-MD-WV		\$126,224	Families Below Poverty Level			6.1%
<i>Source: 2020 U.S. Census and 2023 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.</i>						

Washington, DC

According to the 2023 Moody's Analytics report, the MSA's strengths included its high per capita income and educated workforce, being a popular tourist destination, and being a major center for computer systems design and technology-related professional services. The MSA's growth trended upward, surpassing its pre-pandemic levels, in part due to increased healthcare sector employment increases. The 2023 unemployment rate for the MSA was 3.0 percent compared to 4.6 percent in 2021. The leading industries by wage tier included federal government, computer systems design and related services, management, scientific, and technical consultation services, total military personnel, and local government. Major employers included Naval Support Activity Washington, Joint Base Andrews-Naval Air Facility, MedStar Health, Marriott International, Inc., and Inova Health System.

Baltimore, MD

According to the 2023 Moody's Analytics report, the MSA's strengths included being a hub for growing cybersecurity, having established and well-funded medical research centers, and strong transportation and distribution industries. The MSA's growth has decelerated with minimal changes, apart from healthcare employment. The 2023 unemployment rate for the MSA was 2.6 percent compared to 5.0 percent in 2021. The leading industries by wage tier included federal government, computer systems design and related services, offices of physicians, building equipment contractors, and local government. Major employers included Fort George G. Meade, John Hopkins University, John Hopkins Health System, University of Maryland Medical System, and Aberdeen Proving Ground.

Community Contacts

Examiners reviewed seven community contacts completed during the review period with organizations serving the area. These organizations focus on economic development, affordable housing, and community services targeted to LMI individuals. Contacts noted that the unemployment rate is low and major industries are doing well; however small businesses are not experiencing the same level of growth. Additionally, contacts noted that housing and rent price increases are outpacing wage growth. Contacts noted that small businesses have a need for capital and small business loans. Contacts also noted there is a strong need for affordable housing.

Credit and CD needs identified include:

- Economic development benefitting LMI communities
- Affordable housing for rent and purchase
- Financial literacy education for LMI individuals

Opportunities for participation by financial institutions include the following:

- Providing small business loans
- Providing down payment assistance and first-time homebuyer programs
- Providing grants to nonprofit organizations focused on affordable housing

Scope of Evaluation in Washington DC CSA

Examiners conducted a full-scope review of the Washington DC CSA. The AA was chosen for full-scope review because it represents all of the lending, deposits, and branches in the rating area. Home mortgage loans were given more weight than small business loans when arriving at the bank's overall lending performance based on the volume of loans.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WASHINGTON DC CSA

LENDING TEST

The bank's performance under the Lending Test in the Washington DC CSA is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the Washington DC CSA was good.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Washington DC CSA	5,289	2,371	3	47	7,710

Dollar Volume of Loans (\$000s)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Washington DC CSA	2,091,755	323,524	195	96,866	2,512,340

Based on FDIC deposit market share data as of June 30, 2023, the bank had \$3.4 billion in deposits representing a 1.1 percent deposit market share and is ranked 14th out of 77 financial institutions doing business in the AA. The largest depository institutions include Capital One, NA and Bank of America, NA.

For home mortgage loans, the bank's market share of 1.5 percent ranked 14th out of 748 lenders (top two percent). The top three lenders were PennyMac Loan Services LLS with 4.9 percent market share, Truist Bank with 4.4 percent market share, and Rocket Mortgage with 3.9 percent market share.

For small loans to businesses, the bank's market share of 0.2 percent ranked 23rd out of 236 lenders (top 10 percent). The top three lenders were American Express with 28 percent market share, JPMorgan Chase Bank with 16.7 percent market share, and Bank of America with 13.2 percent market share. The top two small business lenders were institutions with large business credit card portfolios with average loan sizes of \$16,000 or less. The bank's average small business loan size was \$203,000.

Distribution of Loans by Income Level of the Geography

The bank exhibited adequate geographic distribution of loans in its AA. Examiners generally placed more emphasis on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units and small businesses.

Home Mortgage Loans

Refer to Table O in the Washington DC CSA 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.

The overall geographic distribution of home mortgage loans was poor.

2021

The percentage of home mortgage loans originated or purchased in low-income geographies was significantly below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies was well below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

2022-2023

The percentage of home mortgage loans originated or purchased in low-income geographies was significantly below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies was below the percentage of owner-occupied housing units located in those geographies and was well below the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table Q in the Washington DC CSA 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.

The geographic distribution of small loans to businesses was good.

2021

The percentage of small loans to businesses originated or purchased in low-income geographies was below both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

2022-2023

The percentage of small loans to businesses originated or purchased in low-income geographies was below both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies was below the percentage of businesses located in those geographies but was near to the aggregate percentage of all reporting lenders.

Lending Gap Analysis

The OCC reviewed summary reports, maps, and home mortgage and small business lending activity to identify gaps in the geographic distribution of loans in the full-scope AA. The OCC did not identify any unexplained conspicuous gaps in the full-scope area reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an adequate distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

Refer to Table P in the Washington DC CSA section of Appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was adequate. Examiners considered the housing costs in relation to the median family incomes and the increase in home values during the evaluation period, which limited the affordability for low-income borrowers.

2021

The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below the percentage of those families and was below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers was well below both the percentage of those families and the aggregate percentage of all reporting lenders.

2022-2023

The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below the percentage of those families and was below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers was below the percentage of those families and was well below the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table R in the Washington DC CSA section of Appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was good.

2021

The percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with revenues of \$1 million or less but exceeded the aggregate percentage of all reporting lenders.

2022-2023

The percentage of small loans to businesses with revenues of \$1 million or less was well below the percentage of businesses with revenues of \$1 million or less but exceeded the aggregate percentage of all reporting lenders.

Community Development Lending

The institution was a leader in making CD loans.

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.

The volume of CD lending was excellent and had a positive impact on the Lending Test conclusion. During the evaluation period, the bank originated 47 CD loans totaling \$96.9 million or 26.1 percent of allocated tier 1 capital. The bank's CD loans were responsive to economic development community needs. The institution did not utilize complex or innovative CD loans. By dollar volume, 87.7 percent funded economic development, 5.3 percent funded affordable housing, 1.6 funded revitalization and stabilization efforts, and 5.4 percent funded community services.

The following examples demonstrate the bank's use of responsive CD loans:

- A \$4.5 million loan for the development and construction of an annex to an existing retail building. The property is in a moderate-income geography and the development will create new LMI retail jobs with a mean hourly wage well below the area median income. The project has brought long needed retail options to residents and the workforce of Baltimore's east side.
- A \$7 million loan to a certified minority-owned small business. The business is in a moderate-income, majority-minority geography. The company created 101 permanent positions, of which 57 are held by LMI employees. The loan is to support expansion, economic growth, and development.
- A \$2.1 million loan to refinance existing debt on affordable residential rental real estate properties located in a low-income geography. The project rehabilitated nine formerly abandoned properties in legacy neighborhoods and provided stable housing for LMI families. The LMI tenants are provided the opportunity to become homeowners and are given consideration for rents paid toward the purchase of the home.

- The bank’s participation in the PPP resulted in 32 CRA qualified SBA loans totaling \$49.4 million. These loans were made for a qualified CD purpose and/or to nonprofits providing CD activities and services in the AA.

Product Innovation and Flexibility

The institution used innovative and/or flexible lending practices to serve AA credit needs. As shown in the table below, the bank originated or purchased 97 loans under its flexible lending programs totaling \$31.1 million. For a description of these products see the “Innovative and Flexible Product” section of the Overall Description of Institution.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
FHA	10	2,966
FNB Home Rehabilitation Program	1	309
FNB Homeownership Program	69	19,855
Home Possible Freddie Mac	5	1,522
Home Ready Fannie Mae	6	2,173
U.S. Department of Veterans Affairs	6	4,278
Total	97	31,103

INVESTMENT TEST

The institution’s performance under the Investment Test in the Washington DC CSA is rated Outstanding.

Based on a full-scope review, the institution’s performance in the Washington DC CSA is excellent.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000’s)	#	\$(000’s)	#	% of Total #	\$(000’s)	% of Total \$	#	\$(000’s)
Washington DC CSA	19	30,713	132	70,868	151	100	101,581	100	6	956
Total	19	30,713	132	70,868	151	100	101,581	100	6	956

The tables present the data for the entire rating area. The narrative below addresses performance in full-scope areas only.
** 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 bank's financial reporting system.*

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

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution occasionally uses innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

The dollar volume of current- and prior- period investments represented 27.3 percent of allocated tier 1 capital. Current period investments included 103 qualifying grants and donations totaling \$947,306 to 79 organizations. By dollar volume, 18 percent of these investments funded affordable housing, 21 percent funded economic development, 2.2 percent funded revitalization and stabilization efforts, and 58.8 percent funded community services targeted to LMI individuals.

Examples of community development investments include:

- A \$4 million investment in a LIHTC supporting the development of 140 affordable housing units. The investment supports 82 one-bedroom and 58 two-bedroom apartments that are available to residents over the age of 62 earning at or below 60 percent of area median income.
- A \$5.6 million investment in a LIHTC supporting the rehabilitation of 84 affordable housing units. The project is a four-story building providing apartments for seniors at 80 percent of area median income.
- A \$5.1 million investment in a LIHTC supporting the rehabilitation of 202 affordable housing units. The investment supports the rehabilitation of 21 townhouse style residential buildings that will include one-bedroom, two-bedroom, three-bedroom, and four-bedroom units. The property will set aside 122 units at 60 percent and 80 units at 40 percent of area median income.

SERVICE TEST

The institution's performance under the Service Test in Washington DC CSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Washington DC CSA is excellent.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution'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	NA	Low	Mod	Mid	Upp	NA
Washington DC CSA	100.0	33	100.0	9.1	21.2	27.3	39.4	3.0	8.5	20.3	33.1	36.9	1.1

The bank has 33 branches within the AA, with three branches in a low-income CTs, and seven branches in moderate-income CTs. The bank's distribution of branches in both low-income and moderate-income geographies exceeded the percentage of the population living within those geographies. Examiners considered four branches in a middle-income and upper-income CTs that benefited LMI customers based on data provided by the bank. These branches further supported the service delivery system conclusion.

The bank offered several ADS options including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options which provided additional delivery availability and access to banking services to both retail and business customers. The bank operated 24 deposit-taking ATMs in the AA with 6.7 percent in low-income geographies and 13.3 percent in moderate-income geographies. The bank provided data on customer digital usage. The data analysis had a neutral impact on the Service Test conclusion.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Washington DC CSA	2	9	0	1	-4	-4

To the extent changes have been made, the institution's opening and closing of branches has not affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.

During the evaluation period, the bank closed nine branches, none of which were in LMI geographies. The bank opened two branches, with one being in a moderate-income CT. Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. Branches were generally open from 9:00 a.m. to 5:00 p.m. on Monday through Thursday, 9:00 a.m. to 6:00 p.m. on Fridays, and 9:00 a.m. to 12:00 p.m. on Saturday.

Community Development Services

The institution provided an adequate level of CD services.

Bank employees provided 74 qualified CD service activities to 17 organizations with 827 qualified hours within this AA during the evaluation period. Leadership was evident through board or committee participation in 49 of these activities with the bank executives providing 713 service hours. The bank's assistance was responsive to identified needs in the AA, particularly through assisting in providing access to affordable housing in the community.

Service activity examples during the evaluation period include:

- A bank employee provided 55 hours as a board member and co-chair of an affordable housing organization. The employee participated in development and marketing for the organization as well as serving on the executive committee. The organization builds and sells homes to LMI families enabling them to have access to affordable, stable housing.
- An employee of the bank provided 69 hours as a board member for a local nonprofit organization. The organization's mission is to eliminate the growing problem of weekend hunger for low-income children identified as food insecure. The organization raises awareness about the effects of hunger by partnering with community members and local organizations.
- A bank employee provided 15 hours serving on the board of a local organization that assisted with youth services where a majority of the youth are LMI. The organization's mission includes strengthening communities and inspiring youth and children to achieve their potential through hands-on education, workforce development, and community safety programs.

Multistate Metropolitan Statistical Area Rating

Youngstown MMSA

CRA rating for the Youngstown MMSA⁵: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected good responsiveness to AA credit needs.
- The geographic distribution of the bank's loans was adequate.
- The distribution of the bank's loans among individuals of different income levels and businesses of different sizes was good.
- The bank was a leader in making CD loans. CD lending had a positive impact on the Lending Test rating.
- Qualified investments were excellent in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations. The institution occasionally uses innovative and/or complex investments to support CD initiatives.
- Service delivery systems were accessible to geographies and individuals of different income levels in the bank's AAs.
- The bank provided an adequate level of CD services. CD services were responsive in addressing community needs.

Description of Institution's Operations in Youngstown MMSA

The Youngstown MMSA includes 5 percent of deposits, 4.3 percent of branches, and 4.8 percent of all bank loans. Home mortgages represented 66.6 percent, loans to small businesses represented 33.2 percent, and small loans to farms represented 0.2 percent of lending in the AA. The bank chose full counties in the AA. FNB PA offers a full range of loan and deposit products and services in its AA through its branches. There are 15 financial institutions in the AA and the three largest represent 57.2 percent of deposits.

The Youngstown MMSA AA consists of Mahoning and Trumbull Counties in Ohio; and Mercer County in Pennsylvania. The AA meets the requirements of the CRA and does not arbitrarily

⁵ 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.

exclude any LMI geographies. Refer to Appendix A: Scope of the Examination – List of Assessment Areas and Type of Examination for the counties used to form the AAs.

The evaluation period considers demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for each analysis period.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Youngstown MMSA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	155	14.2	20.0	45.8	20.0	0.0
Population by Geography	556,243	8.7	15.4	50.3	25.7	0.0
Housing Units by Geography	258,796	9.3	16.6	49.6	24.5	0.0
Owner-Occupied Units by Geography	161,805	5.1	12.5	53.0	29.3	0.0
Occupied Rental Units by Geography	68,359	14.5	23.7	44.7	17.0	0.0
Vacant Units by Geography	28,632	20.5	22.6	42.0	14.9	0.0
Businesses by Geography	35,239	7.9	12.6	44.8	34.7	0.0
Farms by Geography	1,387	2.2	6.6	58.3	32.9	0.0
Family Distribution by Income Level	146,502	20.5	18.4	20.6	40.5	0.0
Household Distribution by Income Level	230,164	23.9	16.1	18.0	42.0	0.0
Median Family Income MSA - 49660 Youngstown-Warren-Boardman, OH-PA MSA		\$55,174	Median Housing Value			\$98,762
			Median Gross Rent			\$630
			Families Below Poverty Level			12.7%
<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>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Youngstown MMSA 2022 - 2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	164	8.5	22.6	47.0	20.7	1.2
Population by Geography	541,243	5.7	17.8	49.7	26.1	0.7
Housing Units by Geography	259,266	6.7	19.3	49.2	24.2	0.6
Owner-Occupied Units by Geography	162,885	3.5	16.0	51.6	28.6	0.4
Occupied Rental Units by Geography	68,722	11.4	24.8	46.1	16.4	1.3
Vacant Units by Geography	27,659	14.2	24.8	42.8	17.8	0.4
Businesses by Geography	60,111	6.2	16.5	42.8	34.2	0.4
Farms by Geography	2,128	2.2	12.9	53.2	31.6	0.1
Family Distribution by Income Level	141,805	22.1	16.8	21.1	40.0	0.0
Household Distribution by Income Level	231,607	24.4	16.4	17.4	41.8	0.0
Median Family Income MSA - 49660 Youngstown-Warren-Boardman, OH-PA MSA		\$63,220	Median Housing Value			\$108,950
			Median Gross Rent			\$683
			Families Below Poverty Level			12.9%
<i>Source: 2020 U.S. Census and 2023 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>						

Youngstown, OH

According to the 2023 Moody’s Analytics report, the MSA’s strengths included being a large healthcare industry, having an advantageous location above the Utica and Marcellus Shale reserves, and maintaining highly affordable and undervalued housing. The MSA’s growth remained relatively stagnant compared to Ohio, Pennsylvania, and the nation’s growth. Decreases in the unemployment rate were in direct correlation with decreases in the MSA’s labor force. The 2023 unemployment rate for the MSA was 4.3 percent compared to 6.4 percent in 2021. The leading industries by wage tier included offices of physicians, federal government, iron and steel mills and ferroalloy manufacturing, motor vehicle manufacturing, and local government. Major employers included Mercy Health, Windsor House, Youngstown Air Reserve Station, Steward ValleyCare Health System, and Youngstown State University.

Community Contacts

Examiners reviewed three community contacts completed during the review period with organizations serving the area. These organizations focus on economic development, affordable housing, revitalization and stabilization efforts, and community services targeted to LMI individuals. Contacts noted that the housing supply is limited, which has caused housing prices

to increase dramatically. In addition to monetary credit and investment needs, contacts expressed a need for banker involvement in CD services including bank representation on nonprofit organization board of directors and committees, financial education, and funding for programming.

Credit and CD needs identified include:

- Affordable housing for rent and purchase
- Financial literacy classes including credit counseling and credit coaching
- Banker involvement on nonprofit organization boards and committees

Opportunities for participation by financial institutions include the following:

- Providing financing for affordable housing
- Providing financial education classes
- Banker involvement on nonprofit organization boards and committees

Scope of Evaluation in Youngstown MMSA

Examiners conducted a full-scope review of the Youngstown MMSA. The AA was chosen for full-scope review because it represents all of the lending, deposits, and branches in the rating area. Home mortgage loans were given more weight than small business loans when arriving at the bank’s overall lending performance based on the volume of loans.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN YOUNGSTOWN MMSA

LENDING TEST

The bank’s performance under the Lending Test in the Youngstown MMSA is rated Outstanding.

Based on a full-scope review, the bank’s performance in the Youngstown MMSA was excellent.

Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Youngstown MMSA	2,040	1,018	7	19	3,084

Dollar Volume of Loans (\$000s)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Youngstown MMSA	245,240	118,354	454	48,781	412,829

Based on the June 30, 2023, FDIC Summary of Deposit Market Share Report, the bank ranked fourth out of 15 FDIC-insured depository institutions (top 27 percent) with a 12.7 percent deposit market share. The largest depository institutions include Huntington National Bank, Farmers National Bank of Canfield, and Premier Bank.

For home mortgage loans, the bank's market share of 4.3 percent ranked fourth out of 324 lenders (top two percent). The top three lenders were Huntington National Bank with 14.6 percent market share, Seven Seventeen Credit Union with 9 percent market share, and Ixonia Bank with 6.2 percent market share.

For small loans to businesses, the bank's market share of 1.9 percent ranked 11th out of 95 lenders (top 12 percent). The top three lenders were American Express with 17.2 percent market share, JPMorgan Chase with 15.7 percent market share, and Capital One with 10.5 percent market share. The top three small business lenders were institutions with large business credit card portfolios with average loan sizes of \$14,000 or less. The bank's average small business loan size was \$172,000.

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AA. Examiners generally placed more emphasis on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units and small businesses.

Home Mortgage Loans

Refer to Table O in the Youngstown MMSA 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.

The overall geographic distribution of home mortgage loans was adequate.

2021

The percentage of home mortgage loans originated or purchased in low-income geographies was significantly below the percentage of owner-occupied housing units located in those geographies and was below aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies was significantly below the percentage of owner-occupied housing units located in those geographies and was below the aggregate percentage of all reporting lenders.

2022-2023

The percentage of home mortgage loans originated or purchased in low-income geographies was significantly below the percentage of owner-occupied housing units located in those geographies and was below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies was below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table Q in the Youngstown MMSA 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.

The geographic distribution of small loans to businesses was good.

2021

The percentage of small loans to businesses originated or purchased in low-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies was near to the percentage of businesses located in those geographies but exceeded the aggregate percentage of all reporting lenders.

2022-2023

The percentage of small loans to businesses originated or purchased in low-income geographies was below the percentage of businesses located in those geographies but was near to the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies was well below the percentage of businesses located in those geographies and was below the aggregate percentage of all reporting lenders.

Lending Gap Analysis

The OCC reviewed summary reports, maps, and home mortgage and small business lending activity to identify gaps in the geographic distribution of loans in the full-scope AA. The OCC did not identify any unexplained conspicuous gaps in the full-scope area reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited good distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

Refer to Table P in the Youngstown MMSA section of Appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was good. Examiners considered the housing costs in relation to the median family incomes and the increase in home values during the evaluation period, which limited the affordability for low-income borrowers.

2021

The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below the percentage of those families and was below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded the percentage of those families but was near to the aggregate percentage of all reporting lenders.

2022-2023

The percentage of home mortgage loans originated or purchased to low-income borrowers was well below the percentage of those families but was near to the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers equaled the percentage of those families but was below the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table R in the Youngstown MMSA section of Appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was good.

2021

The percentage of small loans to businesses with revenues of \$1 million or less was near to the percentage of businesses with revenues of \$1 million or less but exceeded the aggregate percentage of all reporting lenders.

2022-2023

The percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with revenues of \$1 million or less but exceeded the aggregate percentage of all reporting lenders.

Community Development Lending

The institution was a leader in making CD loans.

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.

The volume of CD lending was excellent and had a positive impact on the Lending Test conclusion. During the evaluation period, the bank originated 19 CD loans totaling \$48.8 million or 25.9 percent of allocated tier 1 capital. The bank's CD loans were responsive to community service needs. The institution did not utilize complex or innovative CD loans. By dollar volume, 53.1 percent funded economic development, 5.7 percent funded revitalization and stabilization efforts, and 41.2 percent funded community services.

The following examples demonstrate the bank's use of responsive CD loans.

- Two loans totaling \$4.2 million to support the provider of short and long-term care in skilled nursing, assisted living, and memory care facilities. The majority of residents are low-income seniors.
- A \$2.8 million loan to a local authority located in a low-income geography. The loan provided financing to enable the authority to update vital facility infrastructure known to be far beyond the reasonable operating life.
- A \$7.8 million loan to a nonprofit community health center. The nonprofit corporation acts as a Federally Qualified Health Center, required by law to provide medical services to all people, regardless of ability to pay. The health center qualifies for enhanced reimbursement from Medicare and Medicaid and must serve underserved areas or populations, offer a sliding fee discount, provide comprehensive services, have an ongoing quality assurance program, and have a governing board of directors. The nonprofit exists to serve those who have limited access to healthcare, LMI individuals, the uninsured, and the underinsured.
- The bank's participation in the PPP resulted in 11 CRA qualified SBA loans totaling \$18.9 million. These loans were made for a qualified CD purpose and/or to nonprofits providing CD activities and services in the AA.

Product Innovation and Flexibility

The institution made extensive use of innovative and/or flexible lending practices to serve AA credit needs. As shown in the table below, the bank originated or purchased 111 loans under its flexible lending programs totaling \$10.3 million. For a description of these products see the "Innovative and Flexible Product" section of the Overall Description of Institution.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
FHA	12	1,610
FNB Homeownership Program	96	8,430
Home Ready Fannie Mae	1	113
U.S. Department of Agriculture	2	191
Total	111	10,344

INVESTMENT TEST

The institution’s performance under the Investment Test in Youngstown MMSA is rated Outstanding.

Based on a full-scope review, the institution’s performance in the Youngstown MMSA is excellent.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000’s)	#	\$(000’s)	#	% of Total #	\$(000’s)	% of Total \$	#	\$(000’s)
Youngstown MMSA	15	7,946	69	5,751	84	100	13,698	100	2	868
Total	15	7,946	69	5,751	84	100	13,698	100	2	868

The tables present the data for the entire rating area. The narrative below addresses performance in full-scope areas only.
** 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 bank's financial reporting system.*

The institution has an excellent level of qualified CD investment 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 occasionally uses innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

The dollar volume of current- and prior- period investments represented 7.3 percent of allocated tier 1 capital. Current period investments included 67 qualifying grants and donations totaling \$572,909 to 43 organizations. By dollar volume, 7.4 percent of these investments funded affordable housing, 10.9 percent funded economic development, 3.9 percent funded revitalization and stabilization efforts, and 77.8 percent funded community services targeted to LMI individuals.

Examples of community development investments include:

- A \$5 million investment in a LIHTC supporting the development of 200 affordable housing units located in a nine-story residential building. The project will consist of 191 one-bedroom units and nine two-bedroom units. The property will set aside tax credit units at 30 percent, 50 percent, and 80 percent of area median income for seniors 62 and older.
- A \$4.2 million investment in a pool of 28 MBSs made up of home mortgage loans to LMI individuals located in LMI geographies within the AA.
- A \$949,369 new market tax credit fund supporting the creation of 40 low-income jobs at a company in Warren, OH.

SERVICE TEST

The institution’s performance under the Service Test in the Youngstown MMSA is rated High Satisfactory.

Based on a full-scope review, the institution’s performance in the Youngstown MMSA is good.

Retail Banking Services

Service delivery systems were accessible to geographies and individuals of different income levels in the institution’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	N/A
Youngstown MMSA	100.0	15	100.0	6.7	13.3	46.7	33.3	5.7	17.8	49.7	26.1	0.7

The bank has 15 branches within the AA, with one branch in a low-income CT, and two branches in moderate-income CTs. The bank’s distribution of branches in low-income geographies exceeded, and in moderate-income geographies was below the percentage of the population living within those geographies.

The bank offered several ADS options including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options which provided additional delivery availability and access to banking services to both retail and business customers. The bank operated 24 deposit-taking ATMs in the AA with 6.7 percent in low-income geographies and 13.3 percent in moderate-income geographies. The bank provided data on customer digital usage. The data analysis had a neutral impact on the Service Test conclusion.

Distribution of Branch Openings/Closings						
	Branch Openings/Closings					
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Youngstown MMSA	0	2	0	0	-2	0

To the extent changes have been made, the institution’s opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.

During the evaluation period, the bank closed two branches, none of which were in LMI geographies. The bank did not open any branches during the evaluation period. Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. Branches were generally open from 9:00 a.m. to 5:00 p.m. on Monday through Thursday, 9:00 a.m. to 6:00 p.m. on Fridays, and 9:00 a.m. to 12:00 p.m. on Saturday. Of the five branches open on Saturday, one branch in a moderate-income CT did offer drive-thru hours from 9:00 a.m. to 12:00 p.m.

Community Development Services

The institution provided an adequate level of CD services.

Bank employees provided 18 qualified CD service activities to ten organizations with 183 qualified hours within this AA during the evaluation period. Leadership was evident through board or committee participation in 11 of these activities with bank executives providing 165 service hours. The bank’s assistance was responsive to identified needs in the AA, particularly through housing rehabilitation and financial assistance.

Service activity examples during the evaluation period include:

- One employee provided six hours serving on the board of a CDFI dedicated to promoting economic growth in underserved communities by financing businesses and creating jobs. The CDFI is authorized to process SBA 504 and 7(a) loans. The organization develops employment opportunities through small business creation, expansion, and retention.
- A bank employee provided 50 hours serving as a board president for a nonprofit organization that provides community services to LMI individuals and families that seek basic needs such as financial help to provide food, clothing, shelter, and medical attention.

State Rating

State of North Carolina

CRA rating for the State of North Carolina⁶: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected good responsiveness to AA credit needs.
- The geographic distribution of the bank's loans was adequate.
- The distribution of the bank's loans among individuals of different income levels and businesses of different sizes was adequate.
- The bank was a leader in making CD loans. CD lending had a positive impact on the Lending Test rating.
- Qualified investments were excellent in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations. The institution occasionally uses innovative and/or complex investments to support CD initiatives.
- Service delivery systems were accessible to geographies and individuals of different income levels in the bank's AAs.
- The bank provided an adequate level of CD services. CD services were responsive in addressing community needs.

Description of Institution's Operations in North Carolina

The bank has 11 AAs delineated in the rating area. Examiners combined, analyzed, and presented those AAs as CSAs where possible for purposes of this evaluation. The bank's AA in the Asheville MSA consists of Buncombe County. The bank's AA in the Fayetteville CSA consists of Cumberland, Lee, and Moore Counties. The bank's AA in the Goldsboro MSA consists of Wayne County (AA created 2023). The bank's AA in the Greensboro CSA consists of Alamance, Davidson, Forsyth, Guilford, Rockingham, Stokes, Surry, and Yadkin Counties. The bank's AA in the Greenville NC CSA consists of Beaufort, Lenoir (added to AA in 2023), and Pitt Counties. The bank's AA in the Jacksonville MSA consists of Onslow County. The bank's AA in the Myrtle Beach MSA consists of Brunswick County. The bank's AA in the NC Non-MSA consists of Ashe, Avery (removed from AA in 2023), Dare, Hyde, Martin, Perquimans, Tyrrell, Watauga, and

⁶ 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.

Wilkes Counties. The bank's AA in the New Bern MSA consists of Craven County. The bank's AA in the Raleigh CSA consists of Durham, Granville (added to AA in 2023), Orange, Person (added to AA in 2023), Franklin (added to AA in 2023), Johnston, Wake, and Vance (added to AA in 2023) Counties. The addition of the four counties to the Raleigh CSA required an additional analysis period covering January 1, 2023 through December 31, 2023. The bank's AA in the Wilmington MSA consists of New Hanover and Pender Counties.

The Goldsboro MSA was added to the rating area in 2023 due to the UB Bank merger. Lenoir County was added to the Greenville NC CSA in 2023 due to the same merger. Avery County was removed from the NC Non-MSA in 2023 due to a branch closing. The New Bern MSA was added to the rating area in 2023 due to the UB Bank Merger. Franklin, Granville, Person, and Vance Counties were added to the Raleigh CSA in 2023 due to the UB merger. The AA meets the requirements of the CRA and does not arbitrarily exclude any LMI geographies. Refer to Appendix A: Scope of the Examination – List of Assessment Areas and Type of Examination for the counties used to form the AAs.

Greensboro CSA

The Greensboro CSA represents 5.9 percent of deposits, 6.9 percent of branches, and 6.4 percent of all bank loans. Home mortgages represented 30.4 percent, loans to small businesses represented 33.4 percent, and small loans to farms represented 21.1 percent of lending in the State of North Carolina rating area. Home mortgages represented 66.8 percent, loans to small businesses represented 33 percent, and small loans to farms represented 0.2 percent of lending in the Greensboro CSA. The bank chose full counties in the AA. FNB PA offers a full range of loan and deposit products and services in its AA through its branches. There are 30 financial institutions in the AA and the three largest represent 55.2 percent of deposits.

The Burlington, NC MSA, Greensboro-High Point, NC MSA, Winston-Salem, NC MSA, and one non-MSA County were combined into the Greensboro CSA for analysis and conclusions on performance.

Based on FDIC deposit market share data as of June 30, 2023, the bank had \$2 billion in deposits representing a 6.1 percent deposit market share and is ranked sixth out of 30 financial institutions doing business in the AA. The largest depository institutions include Truist Bank, Wells Fargo Bank, NA, and Bank of America, NA.

The evaluation period considers demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for each analysis period.

Table A – Demographic Information of the Assessment Area**Assessment Area: Greensboro CSA 2021**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	341	7.9	22.9	38.7	29.6	0.9
Population by Geography	1,437,674	6.4	23.1	40.5	29.7	0.3
Housing Units by Geography	638,776	6.4	23.4	41.1	29.0	0.1
Owner-Occupied Units by Geography	367,706	2.9	17.6	44.0	35.4	0.0
Occupied Rental Units by Geography	202,072	12.0	31.6	36.0	20.0	0.3
Vacant Units by Geography	68,998	8.6	30.2	40.3	20.7	0.2
Businesses by Geography	130,108	4.8	20.0	36.8	38.1	0.3
Farms by Geography	4,125	2.1	15.8	47.5	34.5	0.1
Family Distribution by Income Level	371,344	22.0	17.8	18.3	41.8	0.0
Household Distribution by Income Level	569,778	23.7	16.7	17.2	42.4	0.0
Median Family Income MSA - 15500 Burlington, NC MSA		\$53,234	Median Housing Value			\$144,982
Median Family Income MSA - 24660 Greensboro-High Point, NC MSA		\$55,218	Median Gross Rent			\$734
Median Family Income MSA - 49180 Winston-Salem, NC MSA		\$56,536	Families Below Poverty Level			13.6%
Median Family Income Non-MSAs - NC		\$47,217				

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						
Assessment Area: Greensboro CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	367	9.0	19.9	42.2	28.1	0.8
Population by Geography	1,508,423	7.2	19.3	42.9	30.2	0.4
Housing Units by Geography	662,277	7.4	19.7	44.1	28.4	0.4
Owner-Occupied Units by Geography	382,679	3.4	15.2	46.7	34.5	0.2
Occupied Rental Units by Geography	209,843	13.6	26.2	39.4	20.0	0.8
Vacant Units by Geography	69,755	10.1	25.3	44.2	20.0	0.4
Businesses by Geography	189,423	7.2	17.3	38.8	36.4	0.3
Farms by Geography	5,684	3.7	13.5	50.0	32.6	0.2
Family Distribution by Income Level	380,824	21.9	17.2	19.2	41.6	0.0
Household Distribution by Income Level	592,522	23.9	16.4	17.1	42.6	0.0
Median Family Income MSA - 15500 Burlington, NC MSA		\$66,737	Median Housing Value			\$160,269
Median Family Income MSA - 24660 Greensboro-High Point, NC MSA		\$65,831	Median Gross Rent			\$831
Median Family Income MSA - 49180 Winston-Salem, NC MSA		\$66,563	Families Below Poverty Level			11.3%
Median Family Income Non-MSAs - NC		\$57,962				
<i>Source: 2020 U.S. Census and 2023 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.</i>						

Greensboro, NC

According to the 2023 Moody's Analytics report, the MSA's strengths included low business costs coupled with a large consumer base, low living costs, and high housing affordability. The MSA's growth has historically lagged the other large metropolians in North Carolina. Job growth was weak, particularly with higher-paying jobs becoming near obsolete during the evaluation period. The 2023 unemployment rate for the MSA was 3.8 percent compared to 4.8 percent in 2021. The leading industries by wage tier included offices of physicians, management of companies and enterprises, federal government, insurance carriers, and local government. Major employers included Cone Health, LabCorp, Inc., The Volvo Group, United Healthcare, and the University of North Carolina.

Burlington, NC

According to the 2023 Moody's Analytics report, the MSA's strengths included a robust population with favorable migration trends, above-average housing affordability, and low cost of doing business. The MSA experienced steady job growth, specifically in the education and healthcare sectors, which offset the decline in manufacturing jobs. The 2023 unemployment rate for the MSA was 3.8 percent compared to 5.5 percent in 2021. The leading industries by wage tier included colleges, universities, and professional schools, plastic products manufacturing, agencies, brokerages, and other insurance related activities, management of companies and enterprises, and medical and diagnostic laboratories. Major employers included Laboratory Corporation of America, Cone Health, Alamance Regional Medical Center, Elon University, Walmart, and GKN Driveline North America.

Winston Salem, NC

According to the 2023 Moody's Analytics report, the MSA's strengths included its proximity to large high-growth areas, the presence of Wake Forest University and its status as a leader in medical research, strong housing market, and low cost of doing business. The MSA's strengths included its ability to nearly return to pre-pandemic unemployment rates, with a large percentage of growth attributed to nonfarm payrolls as well as the mixed-use incubator of biomedical science and clinical research, leading the area to become a regional medical hub. The 2023 unemployment rate for the MSA was 3.4 percent compared to 4.8 percent in 2021. The leading industries by wage tier included management of companies and enterprises, depository credit intermediation, offices of physicians, colleges, universities and professional schools, and general medical and surgical hospitals. Major employers included Wake Forest University, Congruity HR, Wal-Mart Associates, Inc., Ashley Furniture Industries, Inc., and Forsyth Memorial Hospital, Inc.

Community Contacts

Examiners reviewed three community contacts completed during the review period with organizations serving the area. These organizations focus on affordable housing, economic development, and workforce development. One business organization noted that the area is thriving, economic conditions are stable, and there is a great young population due to colleges in the area. A second contact noted the housing supply is in a poor condition and there are few homes available for lease.

Credit and CD needs identified include:

- Affordable housing for rent and purchase
- Small businesses lending, specifically to minority businesses
- Community services and infrastructure development for LMI communities

Opportunities for participation by financial institutions include the following:

- Providing program funding to nonprofit organizations
- Providing financing for infrastructure projects
- Providing financing for single family homes in addition to affordable leasable homes, such as townhomes, apartments, and condominiums

Raleigh CSA

The Raleigh CSA represents 4 percent of deposits, 6.1 percent of branches, and 5.7 percent of all bank loans. Home mortgages represented 28.5 percent, loans to small businesses represented 25.9 percent, and small loans to farms represented 7.9 percent of lending in the State of North Carolina rating area. Home mortgages represented 71 percent, loans to small businesses represented 28.9 percent, and small loans to farms represented 0.1 percent of lending in the Raleigh CSA. The bank chose full counties in the AA. The bank offers a full range of loan and deposit products and services in its AA through its branches. There are 40 financial institutions in the AA and the three largest represent 69.1 percent of deposits.

During the evaluation period the bank completed the merger with UB Bancorp adding Franklin, Granville, Person, and Vance Counties in North Carolina to the assessment area. The Durham-Chapel Hill, NC, Raleigh-Cary, NC, and one non-MSA County were combined into the Raleigh CSA for analysis and conclusions on performance. Refer to Appendix A: Scope of the Examination – List of Assessment Areas and Type of Examination for the counties used to form the AAs.

Based on FDIC deposit market share data as of June 30, 2023, the bank had \$1.4 billion in deposits representing a 1.4 percent deposit market share and is ranked ninth out of 40 financial institutions doing business in the AA. The largest depository institutions include First-Citizens, Bank & Trust Company, Wells Fargo, NA, and Truist Bank.

The evaluation period considers demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for each analysis period.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Raleigh CSA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	300	8.0	23.7	28.7	37.3	2.3
Population by Geography	1,581,876	6.7	26.4	32.0	34.2	0.7
Housing Units by Geography	644,225	6.6	26.0	32.9	34.5	0.0
Owner-Occupied Units by Geography	371,527	2.3	22.2	35.1	40.4	0.0
Occupied Rental Units by Geography	222,947	13.0	31.4	29.7	25.8	0.1
Vacant Units by Geography	49,751	9.9	30.3	30.9	28.9	0.0
Businesses by Geography	198,175	4.6	21.6	32.6	40.7	0.5
Farms by Geography	4,654	3.1	23.4	41.5	32.0	0.1
Family Distribution by Income Level	388,984	21.8	16.8	18.6	42.8	0.0
Household Distribution by Income Level	594,474	22.8	16.6	17.5	43.1	0.0
Median Family Income MSA - 20500 Durham-Chapel Hill, NC MSA		\$68,020	Median Housing Value			\$229,417
Median Family Income MSA - 39580 Raleigh-Cary, NC MSA		\$78,057	Median Gross Rent			\$935
			Families Below Poverty Level			9.1%
<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>						

Table A – Demographic Information of the Assessment Area**Assessment Area: Raleigh CSA 2022**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	393	9.2	19.6	33.6	34.4	3.3
Population by Geography	1,818,938	8.2	18.9	35.7	35.3	2.0
Housing Units by Geography	717,487	8.4	19.2	35.9	35.1	1.4
Owner-Occupied Units by Geography	421,185	4.4	17.1	37.1	40.5	1.0
Occupied Rental Units by Geography	244,049	14.4	22.7	34.6	26.3	1.9
Vacant Units by Geography	52,253	12.2	20.4	32.7	32.6	2.2
Businesses by Geography	267,149	6.4	16.8	35.2	40.2	1.4
Farms by Geography	5,863	7.5	18.1	40.0	33.1	1.4
Family Distribution by Income Level	430,319	21.4	16.3	20.2	42.1	0.0
Household Distribution by Income Level	665,234	22.8	16.6	17.7	42.8	0.0
Median Family Income MSA - 20500 Durham-Chapel Hill, NC MSA		\$84,764	Median Housing Value			\$283,334
Median Family Income MSA - 39580 Raleigh-Cary, NC MSA		\$96,929	Median Gross Rent			\$1,163
			Families Below Poverty Level			6.5%

Source: 2020 U.S. Census and 2022 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						
Assessment Area: Raleigh CSA 2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	443	8.8	23.3	33.4	31.4	3.2
Population by Geography	2,030,178	7.7	22.0	36.1	32.3	1.9
Housing Units by Geography	809,941	7.9	22.7	36.4	31.8	1.2
Owner-Occupied Units by Geography	478,640	4.2	20.7	37.7	36.5	0.9
Occupied Rental Units by Geography	266,938	13.6	25.7	34.4	24.6	1.8
Vacant Units by Geography	64,363	11.2	25.2	34.7	27.1	1.8
Businesses by Geography	327,000	6.3	19.1	35.6	37.6	1.3
Farms by Geography	8,075	6.8	23.3	40.0	28.8	1.2
Family Distribution by Income Level	486,373	22.4	16.8	20.5	40.3	0.0
Household Distribution by Income Level	745,578	23.6	16.8	17.8	41.8	0.0
Median Family Income MSA - 20500 Durham-Chapel Hill, NC MSA		\$84,764	Median Housing Value			\$267,687
Median Family Income MSA - 39580 Raleigh-Cary, NC MSA		\$96,929	Median Gross Rent			\$1,131
Median Family Income Non-MSAs - NC		\$57,962	Families Below Poverty Level			7.0%
<i>Source: 2020 U.S. Census and 2023 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>						

Raleigh, NC

According to the 2023 Moody's Analytics report, the MSA's strengths included its low cost of doing business and living compared to other technology hubs, a high per capita income that supports consumption, positive migration trends with a high concentration of prime-age workers, and high economic vitality. The MSA's growth ranked among the top ten metropolitan areas, outpacing state and national averages. Growth was above average in most industries in the MSA, particularly construction, professional and business services, and healthcare. The 2023 unemployment rate for the MSA was 3.1 percent compared to 4.1 percent in 2021. The leading industries by wage tier included computer systems design and related services: management, scientific, and technical consultation services: architectural, engineering, and related services: depository credit intermediation: and local government. Major employers included WakeMed Health and Hospitals, North Carolina State University, IBM Corporation, UNC Rex Healthcare, and SAS Institute, Inc.

Durham, NC

According to the 2023 Moody's Analytics report, the MSA's strengths included its low cost of doing business and living compared to other technology hubs, a high per capita income, favorable migration trends, and a highly skilled workforce. The MSA's growth was on par with other large metropolitans in the state due to a strong labor market and single-family house prices falling. The 2023 unemployment rate for the MSA was 3.1 percent compared to 4.1 percent in 2021. The leading industries by wage tier included scientific research and development services, federal government, computer systems design and related services, pharmaceutical and medicine manufacturing, and state government. Major employers included Duke University, Walmart, IBM Corporation, IQVLA Rds, Inc., Cisco Systems, and Blue Cross Blue Shield of NC.

Community Contacts

Examiners reviewed five community contacts completed during the review period with organizations serving the area. These organizations focus on affordable housing, economic development, revitalization and stabilization efforts, community services targeted to LMI individuals, and workforce development. Contacts noted that there is a need for affordable housing. In addition to monetary credit and investment opportunities, contacts expressed there is an opportunity for banks to build relationships with small businesses through technical assistance and outreach.

Credit and CD needs identified include:

- Affordable housing for rent and purchase
- Financial literacy classes for small businesses
- Small business financing

Opportunities for participation by financial institutions include the following:

- Financing affordable housing projects
- Providing financial literacy classes for small businesses
- Providing small business financing

Scope of Evaluation in North Carolina

Examiners conducted a full-scope review of the Greensboro CSA and Raleigh CSA. The AAs were chosen for full-scope review because they represent more than 56 percent of lending, deposits, and branches in the rating area. While the Greensboro and Raleigh CSAs represent a majority of the state, the overall conclusions and rating for the state consider all activities within all assessment areas. Home mortgage loans were given more weight than small business loans when arriving at the bank's overall lending performance based on the volume of loans in all AAs except the Goldsboro MSA and Jacksonville MSA where small business loans were given more weight than home mortgage loans.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NORTH CAROLINA

LENDING TEST

The bank's performance under the Lending Test in North Carolina is rated High Satisfactory. Performance in the limited-scope AA had a neutral impact on the overall Lending Test conclusion for the State of North Carolina.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in both the Greensboro CSA and the Raleigh CSA was good.

Lending Activity

Lending levels reflected good 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	112	38	0	1	151	1.2	0.5
Fayetteville CSA	386	126	1	2	515	4.0	4
Goldsboro MSA	5	6	0	1	12	0.1	0.9
Greensboro CSA	2,706	1,335	8	15	4,064	31.3	33.4
Greenville CSA	314	156	1	2	473	3.6	6.4
Jacksonville MSA	71	84	0	1	156	1.2	2
Myrtle Beach MSA	957	98	0	1	1,056	8.1	4
NC Non-MSA	1,020	732	25	2	1,779	13.7	18.8
New Bern MSA	59	14	0	0	73	0.6	1
Raleigh CSA	2,540	1,034	3	18	3,595	27.7	22.9
Wilmington MSA	729	361	0	5	1,095	8.4	6.1
Total	8,899	3,984	38	48	12,969	100.0	100.0
Statewide/Regional Loans with Direct Benefit	0	0	0	1	1	0	0
Statewide/Regional Loans with Indirect Benefit	0	0	0	20	20	0	0

Dollar Volume of Loans* (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Asheville MSA	46,680	10,620	0	1,800	59,100	1.8	0.5
Fayetteville CSA	103,430	17,356	0	11,352	132,138	3.9	4
Goldsboro MSA	525	376	0	1,165	2,066	0.1	0.9
Greensboro CSA	687,900	137,159	1,431	50,368	876,858	26.1	33.4
Greenville CSA	55,850	16,252	100	2,947	75,149	2.2	6.4
Jacksonville MSA	21,475	8,303	0	1,059	30,837	0.9	2
Myrtle Beach MSA	382,075	8,564	0	1,250	391,889	11.6	4
NC Non-MSA	217,340	58,726	2,536	2,510	281,112	8.4	18.8
New Bern MSA	8,895	1,453	0	0	10,348	0.3	1
Raleigh CSA	976,490	141,972	99	73,769	1,192,330	35.4	22.9
Wilmington MSA	243,895	43,912	0	25,135	312,942	9.3	6.1
Total	2,744,555	444,693	4,166	171,355	3,364,769	100.0	100.0
Statewide/Regional Loans with Direct Benefit	0	0	0	5,000	5,000	0	0
Statewide/Regional Loans with Indirect Benefit	0	0		40,600	40,600	0	0

Greensboro CSA

Lending levels reflected good responsiveness to AA credit needs.

Based on the June 30, 2023, FDIC Summary of Deposit Market Share Report, the bank ranked sixth out of 30 FDIC-insured depository institutions (top 20 percent) with a 6.1 percent deposit market share.

For home mortgage loans, the bank's market share of 2.1 percent ranked 10th out of 602 lenders (top two percent). The top three lenders were State Employees' Credit Union with 14 percent market share, Truliant Federal Credit Union with 5.4 percent market share, and Rocket Mortgage with 5 percent market share.

For small loans to businesses, the bank's market share of 0.7 percent ranked 18th out of 140 lenders (top 13 percent). The top three lenders were American Express with 22.4 percent market share, Synchrony Bank with 10 percent market share, and Truist Bank with 8 percent market share. The top two small business lenders were institutions with large business credit card portfolios with average loan sizes of \$13,000 or less. The bank's average small business loan size was \$140,000.

Raleigh CSA

Lending levels reflected excellent responsiveness to AA credit needs.

Based on the June 30, 2023 FDIC Summary of Deposit Market Share Report, the bank ranked ninth out of 40 FDIC-insured depository institutions (top 23 percent) with a 1.4 percent deposit market share.

For home mortgage loans, the bank's market share of 1.3 percent ranked 17th out of 700 lenders (top three percent). The top three lenders were State Employees' Credit Union with 14.4 percent market share, Coastal Federal Credit Union with 4.7 percent market share, and Truist Bank with 4.2 percent market share.

For small loans to businesses, the bank's market share of 0.4 percent ranked 22nd out of 164 lenders (top 14 percent). The top three lenders were American Express with 24.3 percent market share, JPMorgan Chase Bank with 13 percent market share, and Bank of America with 8.3 percent market share. The top two small business lenders were institutions with large business credit card portfolios with average loan sizes of \$15,000 or less. The bank's average small business loan size was \$170,000.

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AAs. Examiners generally placed more emphasis on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units and small businesses.

Home Mortgage Loans

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.

The overall geographic distribution of home mortgage loans was poor.

Greensboro CSA

The geographic distribution of home mortgage loans was poor.

2021

The percentage of home mortgage loans originated or purchased in low-income geographies was significantly below the percentage of owner-occupied housing units located in those geographies and was well below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies was well below the percentage of owner-occupied housing units located in those geographies and was below the aggregate percentage of all reporting lenders.

2022-2023

The percentage of home mortgage loans originated or purchased in low-income geographies was well below the percentage of owner-occupied housing units located in those geographies and was significantly below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies was well below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

Raleigh CSA

The geographic distribution of home mortgage loans was poor.

2021

The percentage of home mortgage loans originated or purchased in low-income geographies was significantly below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income was well below both the percentage of owner-occupied housing units located in those geographies and was below the aggregate percentage of all reporting lenders.

2022

The percentage of home mortgage loans originated or purchased in low-income geographies was significantly below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies was well below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

2023

The percentage of home mortgage loans originated or purchased in low-income geographies was well below the percentage of owner-occupied housing units located in those geographies and was significantly below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies was below the percentage of owner-occupied housing units located in those geographies and was well below the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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.

The geographic distribution of small loans to businesses was good.

Greensboro CSA

The geographic distribution of small loans to businesses was good.

2021

The percentage of small loans to businesses originated or purchased in low-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded the percentage of businesses located in those geographies and approximated the aggregate percentage of all reporting lenders.

2022-2023

The percentage of small loans to businesses originated or purchased in low-income geographies was well below both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies was below both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

Raleigh CSA

The geographic distribution of small loans to businesses was good.

2021

The percentage of small loans to businesses originated or purchased in low-income geographies approximated the percentage of businesses located in those geographies and exceeded the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies was below both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

2022

The percentage of small loans to businesses originated or purchased in low-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies was near to the percentage of businesses located in those geographies and was below the aggregate percentage of all reporting lenders.

2023

The percentage of small loans to businesses originated or purchased in low-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

Lending Gap Analysis

The OCC reviewed summary reports, maps, and home mortgage and small business lending activity to identify gaps in the geographic distribution of loans in the full-scope AA. The OCC did not identify any unexplained conspicuous gaps in the full-scope area reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an adequate distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

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.

The distribution of home mortgage loans among individuals of different income levels was adequate. Examiners considered the housing costs in relation to the median family incomes and the increase in home values during the evaluation period, which limited the affordability for low-income borrowers.

Greensboro CSA

The distribution of home mortgage loans among individuals of different income levels was adequate.

2021

The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below the percentage of those families and was below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers was below both the percentage of those families and the aggregate percentage of all reporting lenders.

2022-2023

The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below the percentage of those families but was near to the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers was below both the percentage of those families and the aggregate percentage of all reporting lenders.

Raleigh CSA

The distribution of home mortgage loans among individuals of different income levels was poor.

2021

The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below both the percentage of those families and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers was well below both the percentage of those families and the aggregate percentage of all reporting lenders.

2022

The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below both the percentage of those families and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers was significantly below both the percentage of those families and the aggregate percentage of all reporting lenders.

2023

The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below both the percentage of those families and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers was well below both the percentage of those families and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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.

The distribution of loans to businesses of different sizes was good.

Greensboro CSA

The distribution of loans to businesses of different sizes was good.

2021

The percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with revenues of \$1 million or less but exceeded the aggregate percentage of all reporting lenders.

2022-2023

The percentage of small loans to businesses with revenues of \$1 million or less was well below the percentage of businesses with revenues of \$1 million or less but exceeded the aggregate percentage of all reporting lenders.

Raleigh CSA

The distribution of loans to businesses of different sizes was good.

2021

The percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with revenues of \$1 million or less but exceeded the aggregate percentage of all reporting lenders.

2022

The percentage of small loans to businesses with revenues of \$1 million or less was well below the percentage of businesses with revenues of \$1 million or less but exceeded the aggregate percentage of all reporting lenders.

2023

The percentage of small loans to businesses with revenues of \$1 million or less was well below the percentage of businesses with revenues of \$1 million or less but exceeded the aggregate percentage of all reporting lenders.

Community Development Lending

The institution was a leader in making CD loans.

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.

Greensboro CSA

The volume of CD lending was excellent and had a positive impact on the Lending Test conclusion. During the evaluation period, the bank originated 15 CD loans totaling \$50.4 million or 22.7 percent of allocated tier 1 capital. The bank's CD loans were responsive to community needs. By dollar volume, 71.9 percent funded economic development, 6.6 percent funded affordable housing, 19.3 percent funded revitalization and stabilization efforts, and 2.2 percent funded community services.

The following examples demonstrate the bank's use of responsive CD loans:

- A \$1.9 million loan to finance the purchase and renovation of a multifamily housing complex in a moderate-income geography. The renovation of the 48-unit affordable housing complex included drainage improvements, replacement of retaining walls, and installation of water conservation features in units. All units had rents below the FDIC Affordable Rents limit for the AA.
- A \$1.1 million loan to a local government agency to finance capital projects that provided essential infrastructure and improvements to a moderate-income geography. The projects included a paving project and improvements to public facilities including upgrading HVAC systems in the county jail and updates to the agency's 911 software.
- The bank's participation in the PPP resulted in four CRA qualified SBA loans totaling \$7 million. These loans were made for a qualified CD purpose and/or to nonprofits providing CD activities and services in the AA.

Raleigh CSA

The volume of CD lending was excellent and had a positive impact on the Lending Test conclusion. During the evaluation period, the bank originated 18 CD loans totaling \$73.8 million or 48.6 percent of allocated tier 1 capital. The bank's CD loans were responsive to community needs. By dollar volume, 73 percent funded economic development, 16.7 percent funded affordable housing, 3.4 percent funded revitalization and stabilization efforts, and 6.9 percent funded community services.

The following examples demonstrate the bank's use of responsive CD loans:

- A \$3.7 million loan to finance the purchase of a shopping center located in a moderate-income geography, retaining 50 jobs for primarily LMI individuals.
- A \$1.4 million loan to finance the acquisition of undeveloped land and construct two charter schools and athletic fields in a low-income geography.
- The bank's participation in the PPP resulted in four CRA qualified SBA loans totaling \$5.1 million. These loans were made for a qualified CD purpose and/or to nonprofits providing CD activities and services in the AA.

Broader Statewide or Regional area

The bank originated one CD loan totaling \$5 million in the broader regional area that has a P/M/F that includes serving the AA. The bank originated 20 CD loans totaling \$40.6 million in the statewide area that do not have a P/M/F of serving the bank's AAs. The CD lending further supported the overall High Satisfactory rating for the State of North Carolina.

Product Innovation and Flexibility

The institution made limited use of innovative and/or flexible lending practices to serve AA credit needs. For a description of these products see the "Innovative and Flexible Product" section of the Overall Description of institution.

Greensboro CSA

As shown in the table below, the bank originated or purchased 71 loans under its flexible lending programs totaling \$14.4 million.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
FHA	19	4,617
FNB Homeownership Program	29	4,449
Home Possible Freddie Mac	8	1,156
Home Ready Fannie Mae	2	330
U.S. Department of Agriculture	5	1,029
U.S. Department of Veterans Affairs	8	2,854
Total	71	14,435

Raleigh CSA

As shown in the table below, the bank originated or purchased 30 loans under its flexible lending programs totaling \$9.1 million.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
FNB Homeownership Program	20	5,747
Home Ready Fannie Mae	2	557
U.S. Department of Veterans Affairs	8	2,791
Total	30	9,095

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Asheville MSA, Fayetteville CSA, Myrtle Beach MSA, NC Non-MSA, and Wilmington MSA was consistent with the bank's overall performance under the Lending Test in the full-scope areas. The bank's performance under the Lending Test in the Jacksonville MSA was stronger than the bank's overall performance under the Lending Test in the full-scope areas due to a stronger geographic distribution. The bank's performance under the Lending Test in the Goldsboro MSA, Greenville CSA, and New Bern MSA was weaker than the bank's overall performance under the Lending Test in the full-scope areas. The Goldsboro MSA did not have a sufficient number of home mortgage loans or small loans to businesses to conduct a meaningful geographic or borrower analysis, but the level of CD lending was consistent with the full-scope areas. The weaker performance in the Greenville CSA was due to a weaker geographic distribution. The weaker performance in the New Bern MSA was due to weaker geographic

and borrower distributions and no CD lending. Performance in the limited-scope AA had a neutral impact on the overall Lending Test conclusion for the State of North Carolina.

Refer to Tables O through T 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 the State of North Carolina is rated Outstanding. Performance in the limited-scope AAs had a neutral impact on the Investment Test conclusion for the State of North Carolina.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Greensboro CSA and Raleigh CSA is excellent.

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	0	0	4	5	4	1.7	5	0.0	0	0
Fayetteville CSA	6	4,519	5	9	11	4.7	4,528	8.3	2	67
Goldsboro MSA	0	0	0	0	0	0.0	0	0.0	0	0
Greensboro CSA	12	7,595	57	7,895	69	29.7	15,490	28.5	7	1,196
Greenville CSA	0	0	5	2,664	5	2.2	2,664	4.9	0	0
Jacksonville MSA	0	0	6	366	6	2.6	366	0.7	0	0
Myrtle Beach MSA	1	85	1	5	2	0.9	90	0.2	1	266
NC Non-MSA	1	85	31	552	32	13.8	637	1.2	1	266
New Bern MSA	1	1,930	0	0	1	0.4	1,930	3.6	1	118
Raleigh CSA	10	8,334	68	17,607	78	33.6	25,941	47.7	4	462
Wilmington MSA	2	465	22	2,254	24	10.3	2,719	5.0	1	266
Total	33	23,013	199	31,357	232	100	54,370	100	17	2,641

The tables present the data for the entire rating area. The narrative below addresses performance in full-scope areas only.

** 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 bank's financial reporting system.*

Greensboro CSA

The institution has an excellent level of qualified CD investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution occasionally uses innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

The dollar volume of current- and prior- period investments represented 7 percent of allocated tier 1 capital. Current period investments included 53 qualifying grants and donations totaling \$170,760 to 30 organizations. By dollar volume, 19 percent of these investments funded affordable housing, 13.2 percent funded economic development, and 67.8 percent funded community services targeted to LMI individuals.

Examples of community development investments include:

- A \$2.5 million investment in a LIHTC supporting the development of 50 affordable housing units located in one residential building. The project will provide four studios, 36 one-bedroom units, and 10 two-bedroom units for seniors aged 55 years and older earning between 40 percent and 60 percent of area median income.
- A \$4 million investment in a LIHTC supporting the development of 100 affordable housing units located in a six-story residential building. The project will provide one-bedroom, two-bedroom, three-bedroom, and four-bedroom units for seniors earning less than 80 percent of area median income.
- A \$352,400 investment in a LIHTC supporting the redevelopment of 70 affordable housing units. The project will provide units for residents earning less than 80 percent of area median income.

Raleigh CSA

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

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution occasionally uses innovative and/or complex investments to support CD initiatives.

The dollar volume of current- and prior- period investments represented 17.1 percent of allocated tier 1 capital. Total qualified investments included 57 qualifying grants and donations totaling \$273,660 to 35 organizations. By dollar volume, 28.6 percent of these investments funded affordable housing, 10.6 percent funded economic development, 3.7 percent funded revitalization and stabilization efforts, and 57.1 percent funded community services targeted to LMI individuals.

Examples of community development investments include:

- A \$2 million investment in a LIHTC supporting the development of 180 affordable housing units located in eight buildings. The property will set aside tax credit units at 30 percent to 70 percent, of area median income.
- A \$1 million investment in a LIHTC supporting the development of 84 affordable housing units located in four garden style residential buildings. There will be 24 one-bedroom units and 60 two-bedroom units; 21 units will be leased to families at or below 30 percent of area median income and 63 leased to families at or below 60 percent area median income.
- A \$5,000 grant for the renovation of an apartment building with 297 affordable housing units for low-income seniors.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Fayetteville CSA, Greenville NC CSA, New Bern MSA, and Wilmington MSA is stronger than the bank's overall performance under the Investment Test in the full-scope areas due to a higher volume of qualified investments. Performance in the Asheville MSA, Goldsboro MSA, Jacksonville MSA, Myrtle Beach MSA, and NC Non-MSA is weaker than the bank's overall performance under the Investment Test in the full-scope areas due to a lower volume of qualified investments. Performance in the limited-scope AAs had a neutral impact with no change in the overall Investment Test conclusion.

Broader Statewide and Regional Investments

The bank was responsive to community development needs and opportunities in its AAs, and examiners considered 18 CD investments totaling \$20.2 million in the broader statewide and regional areas that include the bank's AAs but do not have a P/M/F to specifically serve those AAs. These investments had a neutral impact on the Investment Test rating.

SERVICE TEST

The institution's performance under the Service Test in North Carolina is rated High Satisfactory. Performance in the limited-scope AAs had a neutral impact on the Service Test conclusion for the State of North Carolina.

Based on a full-scope review, the institution's performance in the Greensboro CSA and Raleigh CSA is good.

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits % of Rated Area Deposits in AA	Branches						Population					
		# 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	NA	Lo w	Mod	Mid	Upp	NA
Asheville MSA	0.5	1	1.3	0.0	0.0	100.0	0.0	0.0	1.7	17.8	51.8	28.7	0.0
Fayette CSA	4.0	3	3.8	0.0	0.0	66.7	33.3	0.0	1.1	26.4	47.1	24.5	0.9
Goldsboro MSA	0.9	1	1.3	0.0	0.0	100.0	0.0	0.0	5.7	19.1	48.5	24.5	2.1
Greensboro CSA	33.4	24	30.8	8.3	16.7	50.0	25.0	0.0	7.2	19.3	42.9	30.2	0.4
Greenville CSA	6.4	5	6.4	20.0	20.0	60.0	0.0	0.0	4.3	15.6	47.1	27.0	6.0
Jacksonville MSA	2.0	1	1.3	0.0	100.0	0.0	0.0	0.0	0.2	19.3	47.2	25.1	8.2
Myrtle Beach MSA	4.0	3	3.8	0.0	0.0	100.0	0.0	0.0	2.1	5.2	54.4	38.3	0.0
NC Non-MSA	18.8	14	17.9	0.0	14.3	64.3	14.3	7.1	1.3	9.0	52.0	36.5	1.2
New Bern MSA	1.0	1	1.3	0.0	0.0	0.0	100.0	0.0	0.0	19.3	42.8	32.9	5.0
Raleigh CSA	22.9	21	26.9	14.3	14.3	42.8	28.6	0.0	7.7	22.0	36.1	32.3	1.9
Wilmington MSA	6.1	4	5.1	25.0	0.0	50.0	25.0	0.0	3.7	27.2	37.8	29.4	1.9

Greensboro CSA

The bank has 24 branches within the AA, with two branches in a low-income CTs and four branches in moderate-income CTs. The bank's distribution of branches in low-income geographies exceeded, and in moderate-income geographies was below, the percentage of the population living within those geographies. Examiners also considered four branches in a middle- and upper-income CTs that benefited LMI customers based on data provided by the bank. These branches had a neutral impact on the service delivery system conclusion.

The bank offered several ADS options including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options which provided additional delivery availability and access to banking services to both retail and business customers. The bank operated 25 deposit-taking ATMs in the AA with 8.3 percent in low-income geographies and 16.7 percent in moderate-income geographies. The bank provided data on customer digital usage. The data analysis had a neutral impact on the Service Test conclusion.

Raleigh CSA

The bank has 21 branches within the AA, with three branches in low-income CTs and three branches in moderate-income CTs. The bank's distribution of branches in low-income geographies exceeded, and in moderate-income geographies was below, the percentage of the population living within those geographies. Examiners considered three branches in middle- and upper-income CTs that were "across

the street” and benefited LMI customers based on data provided by the bank. These branches had a neutral impact on the service delivery system conclusion.

The bank offered several ADS options including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options which provided additional delivery availability and access to banking services to both retail and business customers. The bank operated 21 deposit-taking ATMs in the AA with 14.3 percent in low-income geographies and 14.3 percent in moderate-income geographies. The bank provided data on customer digital usage. The data analysis had a minimal impact on the Service Test conclusion.

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
Fayette CSA	0	1	0	0	-1	0
Goldsboro MSA	1	0	0	0	1	0
Greensboro CSA	0	3	0	0	-3	0
Greenville CSA	0	3	0	0	-2	-1
Jacksonville MSA	1	0	0	1	0	0
Myrtle Beach MSA	0	0	0	0	0	0
NC Non-MSA	0	0	0	0	0	0
New Bern MSA	1	0	0	0	0	1
Raleigh CSA	1	0	0	0	1	0
Wilmington MSA	0	0	0	0	0	0

Greensboro CSA

To the extent changes have been made, the institution’s opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.

During the evaluation period, the bank closed three branches, none of which were in LMI geographies. The bank did not open any branches during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. Branches were generally open from 9:00 a.m. to 5:00 p.m. on Monday through Thursday, 9:00 a.m. to 6:00 p.m. on Fridays, and 9:00 a.m. to 12:00 p.m. on Saturday.

Raleigh CSA

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.

During the evaluation period, the bank opened one branch in a middle-income CT. The bank did not close any branches during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. Branches were generally open from 9:00 a.m. to 5:00 p.m. on Monday through Thursday, 9:00 a.m. to 6:00 p.m. on Fridays, and 9:00 a.m. to 12:00 p.m. on Saturday.

Community Development Services

The institution provided an adequate level of CD services.

Greensboro CSA

Bank employees provided 54 qualified CD service activities to 21 organizations with 450 qualified hours within this AA during the evaluation period. Leadership was evident through board or committee participation in 26 of these activities with the bank executives providing 335 service hours. The bank's assistance was responsive to identified needs in the AA, particularly through assisting LMI families as they deal with cost burdens of housing and food pricing increases.

Service activity examples during the evaluation period include:

- One bank employee provided 157 hours teaching students financial literacy and assisting in event planning. The organization reaches students in classrooms and after-school locations. A majority of the programs reach a majority of students in LMI communities.
- A bank employee provided 30 hours serving as co-chair of the board for a local community service organization. The organization assists in the issue of food insecurity for LMI families in the surrounding area by providing a food pantry and assistance with utilities and medicine.

Raleigh CSA

Bank employees provided 48 qualified CD service activities to 11 organizations with 305 qualified hours within this AA during the evaluation period. Leadership was evident through board or committee participation in 14 of these activities with bank executives providing 228 service hours. The bank's assistance was responsive to identified needs in the AA, particularly through assisting in providing access to affordable housing the State of North Carolina.

Service activity examples during the evaluation period include:

- A bank employee provided 80 hours assisting in job preparation activities for local community members and serving on the board of the CDC. The organization's mission included working to eradicate the root causes of poverty and empowering individuals and communities through comprehensive education and support.

- A bank employee provided 15 hours serving as a board member for a local chapter of a nationwide organization. The organization helped locate affordable housing in LMI areas as well as provided homeless shelters to those in need. They also provided summer camps for students, afterschool programs, and services for the aging population in the communities they service.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance in the Greenville CSA is stronger than the bank's overall performance. Stronger performance is due to excellent distribution of branches in LMI geographies. The bank's performance under the Service Test in the remaining limited-scope areas is weaker than the bank's overall performance under the Service Test in the full-scope areas. The weaker performance is due to adequate branch distribution in LMI geographies. Performance in the limited-scope AAs had neutral impact on the Service Test conclusion.

State Rating

State of Ohio

CRA rating for the State of Ohio⁷: Satisfactory

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Needs to Improve

The major factors that support this rating include:

- Lending levels reflected good responsiveness to AA credit needs.
- The geographic distribution of the bank's loans was adequate.
- The distribution of the bank's loans among individuals of different income levels and businesses of different sizes was adequate.
- The bank was a leader in making CD loans. CD lending in the AA and the statewide area had a positive impact on the Lending Test rating.
- Qualified investments were excellent in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations. The institution occasionally uses innovative and/or complex investments to support CD initiatives.
- Service delivery systems were unreasonably inaccessible to geographies and individuals of different income levels in the bank's AAs.
- The bank provided an adequate level of CD services. CD services were responsive in addressing community needs.

Description of Institution's Operations in Ohio

Cleveland CSA

The Cleveland CSA represents 2.6 percent of deposits, 5.2 percent of branches, and 8.4 percent of all bank loans. Home mortgages represented 73.8 percent and loans to small businesses represented 26.2 percent of lending in the AA. The bank chose full counties in the AA. FNB PA offers a full range of loan and deposit products and services in its AA through its branches. There are 37 financial institutions in the AA and the three largest represent 66.9 percent of deposits.

The bank's AA in the Cleveland CSA consists of Cuyahoga, Geauga, Lake, Lorain, Medina, Portage, and Summit counties. The bank closed the lone branch in Summit County, OH on April 21, 2023, removing Summit County, OH from the bank's Cleveland CSA for all of 2023. The removal

⁷ 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.

of Summit county required a separate analysis period for data analyzed from January 1, 2023 through December 31, 2023. The Akron, OH MSA and Cleveland-Elyria, OH MSA were combined to form the Cleveland CSA for analysis and conclusions on performance. The AA meets the requirements of the CRA and does not arbitrarily exclude any LMI geographies. Refer to Appendix A: Scope of the Examination – List of Assessment Areas and Type of Examination for the counties used to form the AAs.

Based on FDIC deposit market share data as of June 30, 2023, the bank had \$899 million in deposits representing a 0.7 percent deposit market share and is ranked 14 out of 37 financial institutions doing business in the AA. The largest depository institutions include Key Bank, NA and The Huntington National Bank.

The evaluation period considers demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for each analysis period.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Cleveland CSA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	808	18.3	22.4	33.8	24.0	1.5
Population by Geography	2,768,227	11.9	19.9	36.2	31.7	0.3
Housing Units by Geography	1,269,259	13.5	22.1	35.6	28.4	0.5
Owner-Occupied Units by Geography	741,333	6.3	16.6	39.6	37.3	0.1
Occupied Rental Units by Geography	388,232	22.1	29.8	31.3	15.9	0.9
Vacant Units by Geography	139,694	28.1	29.4	26.0	15.5	1.0
Businesses by Geography	214,166	9.1	16.4	33.6	40.2	0.7
Farms by Geography	5,505	4.2	11.8	43.0	40.9	0.1
Family Distribution by Income Level	699,389	22.4	16.7	19.7	41.1	0.0
Household Distribution by Income Level	1,129,565	25.6	15.4	16.9	42.1	0.0
Median Family Income MSA - 10420 Akron, OH MSA		\$65,716	Median Housing Value			\$138,355
Median Family Income MSA - 17460 Cleveland-Elyria, OH MSA		\$65,821	Median Gross Rent			\$765
			Families Below Poverty Level			11.3%
<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>						

Table A – Demographic Information of the Assessment Area**Assessment Area: Cleveland CSA 2022**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	807	13.8	21.1	34.6	27.0	3.6
Population by Geography	2,790,470	9.5	18.6	37.0	33.3	1.5
Housing Units by Geography	1,278,809	11.5	20.9	36.1	29.6	1.8
Owner-Occupied Units by Geography	758,041	5.5	15.6	40.7	37.5	0.7
Occupied Rental Units by Geography	402,597	19.4	29.1	30.2	18.0	3.3
Vacant Units by Geography	118,171	22.7	27.6	27.3	18.5	3.9
Businesses by Geography	398,283	11.6	15.4	28.6	42.1	2.3
Farms by Geography	8,455	9.4	13.3	37.3	39.5	0.6
Family Distribution by Income Level	692,272	21.9	17.3	19.9	40.9	0.0
Household Distribution by Income Level	1,160,638	24.9	15.8	17.0	42.2	0.0
Median Family Income MSA - 10420 Akron, OH MSA		\$76,842	Median Housing Value			\$154,584
Median Family Income MSA - 17460 Cleveland-Elyria, OH MSA		\$76,766	Median Gross Rent			\$856
			Families Below Poverty Level			9.6%

Source: 2020 U.S. Census and 2022 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						
Assessment Area: Cleveland CSA 2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	669	13.3	20.8	35.3	26.8	3.9
Population by Geography	2,250,042	9.2	18.3	37.8	33.1	1.6
Housing Units by Geography	1,032,646	11.4	20.6	36.5	29.6	2.0
Owner-Occupied Units by Geography	607,454	5.3	15.0	41.6	37.3	0.8
Occupied Rental Units by Geography	326,463	19.2	29.1	29.8	18.4	3.5
Vacant Units by Geography	98,729	23.0	27.4	26.8	18.7	4.1
Businesses by Geography	369,702	8.9	16.2	29.6	43.6	1.7
Farms by Geography	8,085	5.6	14.1	39.6	40.2	0.6
Family Distribution by Income Level	554,483	22.0	17.3	19.6	41.1	0.0
Household Distribution by Income Level	933,917	25.0	15.7	16.9	42.3	0.0
Median Family Income MSA - 10420 Akron, OH MSA		\$76,842	Median Housing Value			\$155,528
Median Family Income MSA - 17460 Cleveland-Elyria, OH MSA		\$76,766	Median Gross Rent			\$855
			Families Below Poverty Level			9.7%
<i>Source: 2020 U.S. Census and 2023 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>						

Cleveland, OH

According to the 2023 Moody's Analytics report, the MSA's strengths included its manufacturing infrastructure, specialized factory labor, and world-class clinical and research healthcare institutions. The MSA's total payroll growth outpaced the rest of the state and nation due to changes in the healthcare, education, and leisure/hospitality sectors. The 2023 unemployment rate for the MSA was 3.9 percent compared to 5.7 percent in 2021. The leading industries by wage tier included management of companies and enterprises, insurance carriers, federal government, computer systems design and related services, and local government. Major employers included the Cleveland Clinic Foundation, University Hospitals, U.S. Office of Personnel Management, Minute Men Cos., and Group Management Services, Inc.

Akron, OH

According to the 2023 Moody's Analytics report, the MSA's strengths included its relatively low business and living costs and prime location for staffing business outsourcing and HR support roles. The MSA's growth remained relatively flat, with only significant changes in local and state government employment. The 2023 unemployment rate for the MSA was 3.8 percent compared to 5.3 percent in 2021. The leading industries by wage tier included management of companies and enterprises, offices of physicians, insurance carriers, computer systems design and related services, and local government. Major employers included Summa Health System, Akron Children's Hospital, Cleveland Clinic, Minute Men HR Management Services, and FirstEnergy Corporation.

Community Contacts

Examiners reviewed six community contacts completed during the review period with organizations serving the area. These organizations focus on affordable housing, economic development, revitalization

and stabilization efforts, and community services targeted to LMI individuals. Contacts noted that much of the housing stock is older and in need of repairs. A community development organization contact noted there are significant opportunities to provide services including health care, housing, education, and access to food due to the significant poverty levels.

Credit and CD needs identified include:

- Affordable housing for rent and purchase
- Home repair and rehabilitation financing
- Serving underbanked and unbanked individuals

Opportunities for participation by financial institutions include the following:

- Providing financial products for home repairs, rehabilitation, and purchases
- Providing checking accounts to the underbanked and unbanked
- Providing general operating support for nonprofit organizations

Scope of Evaluation in Ohio

Examiners conducted a full-scope review of the Cleveland CSA. The AA was chosen for a full-scope review because it represents all lending, deposits, and branches in the rating area. Home mortgage loans were given more weight than small business loans when arriving at the bank’s overall lending performance based on the volume of loans.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO

LENDING TEST

The bank’s performance under the Lending Test in Ohio is rated Outstanding. CD lending in the statewide area had a positive impact on the Lending Test rating.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Cleveland CSA was good.

Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Cleveland CSA	3,931	1,394	0	27	5,352	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* (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Cleveland CSA	946,465	186,525	0	97,627	1,230,617	100.0	100.0

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

Based on the June 30, 2023 FDIC Summary of Deposit Market Share Report, the bank ranked 14th out of 37 FDIC-insured depository institutions (top 38 percent) with a 0.7 percent deposit market share.

For home mortgage loans, the bank's market share of 1.8 percent ranked 16th out of 559 lenders (top three percent). The top three lenders were Huntington National Bank with 11.2 percent market share, Third Federal Savings and Loan with 9.0 percent market share, and Cross Country Mortgage with 5.8 percent market share.

For small loans to businesses, the bank's market share of 0.4 percent ranked 22nd out of 161 lenders (top 14 percent). The top three lenders were American Express with 23.6 percent market share, JPMorgan Chase Bank with 18.2 percent market share, and Capital One with 8.7 percent market share. The top three small business lenders were institutions with large business credit card portfolios with average loan sizes of \$17,000 or less.

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AA. Examiners generally placed more emphasis on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units and small businesses.

Home Mortgage Loans

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.

The overall geographic distribution of home mortgage loans was poor.

2021

The percentage of home mortgage loans originated or purchased in low-income geographies was significantly below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies was significantly below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

2022

The percentage of home mortgage loans originated or purchased in low-income geographies was significantly below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies was significantly below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

2023

The percentage of home mortgage loans originated or purchased in low-income geographies was significantly below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies was well below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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.

The geographic distribution of small loans to businesses was good.

2021

The percentage of small loans to businesses originated or purchased in low-income geographies was near to both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies approximated both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

2022

The percentage of small loans to businesses originated or purchased in low-income geographies was well below the percentage of businesses located in those geographies and was below the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

2023

The percentage of small loans to businesses originated or purchased in low-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies was near to both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

Lending Gap Analysis

The OCC reviewed summary reports, maps, and home mortgage and small business lending activity to identify gaps in the geographic distribution of loans in the full-scope AA. The OCC did not identify any unexplained conspicuous gaps in the full-scope area reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an adequate distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

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.

The distribution of home mortgage loans among individuals of different income levels was poor. Examiners considered the housing costs in relation to the median family incomes and the increase in home values during the evaluation period, which limited the affordability for low-income borrowers.

2021

The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below both the percentage of those families and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers was well below both the percentage of those families and the aggregate percentage of all reporting lenders.

2022

The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below both the percentage of those families and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers was well below the percentage of those families and was significantly below the aggregate percentage of all reporting lenders.

2023

The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below the percentage of those families and was well below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers was below the percentage of those families and was well below the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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.

The distribution of loans to businesses of different sizes was good.

2021

The percentage of small loans to businesses with revenues of \$1 million or less was near to the percentage of businesses with revenues of \$1 million or less but exceeded the aggregate percentage of all reporting lenders.

2022

The percentage of small loans to businesses with revenues of \$1 million or less was near to the percentage of businesses with revenues of \$1 million or less but exceeded the aggregate percentage of all reporting lenders.

2023

The percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with revenues of \$1 million or less but exceeded the aggregate percentage of all reporting lenders.

Community Development Lending

The institution was a leader in making CD loans.

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.

The volume of CD lending was excellent and had a positive impact on the Lending Test conclusion. During the evaluation period, the bank originated 27 CD loans totaling \$97.6 million or 98.1 percent of allocated tier 1 capital. The bank's CD loans were responsive to community needs. The institution did not utilize complex or innovative CD loans. By dollar volume, 49.2 percent funded economic development, 18.4 percent funded affordable housing, 30.7 percent funded revitalization and stabilization efforts, and 1.7 percent funded community services.

The following examples demonstrate the bank's use of responsive CD loans:

- A \$13.3 million loan for the purchase and renovation of a manufacturing facility for a small business. The facility will be in a moderate-income geography and will retain 150 LMI jobs.
- A \$12.8 million loan to purchase and redevelop a historical building. The project will have a transformational economic impact by turning the building into a mixed-use structure consisting of 155 apartments and retail and office space. The construction of the project will revitalize a downtown business district that is part of the City of Cleveland's redevelopment plan.
- The bank's participation in the PPP resulted in 15 CRA qualified SBA loans totaling \$24.1 million. These loans were made for a qualified CD purpose and/or to nonprofits providing CD activities and services in the AA.

Broader Statewide Area

The bank originated six CD loans totaling \$123.7 million in the statewide area that do not have a P/M/F of serving the bank's AAs. The level of CD lending was significant and had a positive impact on the Lending Test rating.

Product Innovation and Flexibility

The institution made extensive use of innovative and/or flexible lending practices to serve AA credit needs. As shown in the table below, the bank originated or purchased 172 loans under its flexible lending programs totaling \$30.1 million. For a description of these products see the "Innovative and Flexible Product" section of the Overall Description of institution.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
FHA	28	6,544
FNB Home Rehabilitation Program	6	982
FNB Homeownership Program	115	17,505
Home Possible Freddie Mac	2	257
Home Ready Fannie Mae	6	600
U.S. Department of Veterans Affairs	15	4,197
Total	172	30,085

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Cleveland CSA is excellent.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Cleveland CSA	21	23,867	71	29,934	92	100	53,801	100	4	1,010
Total	21	23,867	71	29,934	92	100	53,801	100	4	1,010

The tables present the data for the entire rating area. The narrative below addresses performance in full-scope areas only.

** 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 bank's financial reporting system.*

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

The institution exhibits excellent responsiveness to credit and community economic development needs. It occasionally uses innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

The dollar volume of current- and prior- period investments represented 54 percent of allocated tier 1 capital. Current period investments included 58 qualifying grants and donations totaling \$296,360 to 35 organizations. By dollar volume, 30.7 percent of these investments funded affordable housing, 10.1 percent funded economic development, and 59.2 percent funded community services targeted to LMI individuals.

Examples of community development investments include:

- A \$3 million investment in a LIHTC supporting the development of 240 affordable housing units located in a 13-story residential building. The property consists of one-bedroom and two-bedroom apartment units limited to seniors aged 55 years or older and the non-elderly disabled. Resident's income is limited to 60 percent, 50 percent, and 30 percent of area median income.

- A \$2 million investment to support the development in a LIHTC funded project providing 74 affordable housing units. All units in the project are Section 8 housing.
- A \$2 million investment in a LIHTC supporting the development of 40 affordable housing units. The property consists of units limited to residents with incomes less than 60 percent of area median income.

Broader Statewide and Regional Investments

The bank was responsive to community development needs and opportunities in its AAs and examiners considered 20 CD investments totaling \$56 million in the broader statewide and regional areas that include the bank's AAs but do not have a P/M/F to specifically serve those AAs. These investments had a neutral impact on the Investment Test rating.

SERVICE TEST

The institution's performance under the Service Test in the Cleveland CSA is rated Needs to Improve.

Based on a full-scope review, the institution's performance in the Cleveland CSA is poor.

Retail Banking Services

Service delivery systems were unreasonably inaccessible to portions of the institution's AA, particularly LMI geographies and LMI individuals.

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	NA
Cleveland CSA	100	18	100.0	0.0	0.0	22.2	77.8	9.2	18.3	37.8	33.1	1.6

The bank has 18 branches within the AA, with no branches in LMI CTs. The bank's distribution of branches in LMI geographies was significantly below the percentage of the population living within those geographies. Examiners considered three branches in a middle- and upper-income CTs that benefited LMI customers based on data provided by the bank. These branches had a neutral impact on the service delivery system conclusion.

The bank offered several ADS options including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options which provided additional delivery availability and access to banking services to both retail and business customers. The bank operated 20 deposit-taking ATMs in the AA with none being in LMI geographies. The bank provided data on customer digital usage. The data analysis had minimal impact on the Service Test conclusion.

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
Cleveland CSA	0	1	0	0	0	-1

To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.

During the evaluation period, the bank closed one branch located in an upper-income CT. The bank did not open any branches during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. Branches were open from 9:00 a.m. to 4:30 p.m. on Monday through Thursday, 9:00 a.m. to 5:00 p.m. on Fridays, and 9:00 a.m. to 12:00 p.m. on Saturday.

Community Development Services

The institution provided an adequate level of CD services.

Bank employees provided 20 qualified CD service activities to 11 organizations with 379 qualified hours within this AA during the evaluation period. Leadership was evident through board or committee participation in 12 of these activities with bank executives providing 343 service hours. The bank's assistance was responsive to identified needs in the AA, particularly through assisting in providing affordable housing.

Service activity examples during the evaluation period include:

- A bank employee provided 100 hours serving on the board of a housing and economic development corporation that provided housing rehab and development for LMI individuals. The development corporation carried out community revitalization through the development of affordable and market rate housing.
- A bank employee provided 156 hours serving as a board member of a local organization that provided youth development training and services. The employee participated in job skill development, youth career development, and coaching with students.
- A bank employee provided 25 hours of services as a board chairperson. The board organized an event supporting emergency assistance programs for the local community. The organization has a Healthy Housing Initiative where they support affordable housing policies across the country and provide emergency shelter and long-term assistance to vulnerable populations.

State Rating

State of Pennsylvania

CRA rating for the State of Pennsylvania⁸: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected good responsiveness to AA credit needs.
- The geographic distribution of the bank's loans was good.
- The distribution of the bank's loans among individuals of different income levels and businesses of different sizes was adequate.
- The bank was a leader in making CD loans. CD lending had a positive impact on the Lending Test rating.
- Qualified investments were excellent in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations. The institution occasionally uses innovative and/or complex investments to support CD initiatives.
- Service delivery systems were accessible to geographies and individuals of different income levels in the bank's AAs.
- The bank provided a low level of CD services. CD services were responsive in addressing community needs.

Description of Institution's Operations in Pennsylvania

The bank's AA in the Altoona CSA consists of Blair and Huntington Counties. The AA in the East Stroudsburg MSA consists of Monroe County. The AA in the Erie CSA consists of Crawford and Erie Counties. The AA in the Harrisburg CSA consists of Cumberland Dauphin, Lebanon, and York Counties. The AA in the Johnstown CSA consists of Cambria and Somerset Counties. The AA in the Lancaster MSA consists of Lancaster County.

The bank's AA in the PA Non-MSA consists of Bedford, Greene, Juniata, Mifflin, Northumberland, Schuylkill, Snyder, Susquehanna, Union, and Venango counties. The AA in the Scranton MSA consists of Lackawanna, Luzerne, and Wyoming Counties. The AA in the State College MSA consists of Centre County. The bank's AA in the Williamsport CSA consists of Clinton and Lycoming Counties.

⁸ 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.

The Altoona, PA MSA and a Non-MSA County were combined to form the Altoona CSA. The Erie, PA MSA and a Non-MSA County were combined to form the Erie CSA. The Lebanon, PA MSA, Harrisburg-Carlisle, PA MSA, and York-Hanover, PA MSA were combined to form the Harrisburg CSA for analysis and conclusions on performance. The Johnstown, PA MSA and a Non-MSA County were combined to form the Johnstown CSA. The Williamsport, PA MSA and a Non-MSA County were combined to form the Williamsport CSA. The AAs meet the requirements of the CRA and do not arbitrarily exclude any LMI geographies. Refer to Appendix A: Scope of the Examination – List of Assessment Areas and Type of Examination for the counties used to form the AAs.

Harrisburg CSA

The Harrisburg CSA represents 7 percent of deposits, 4.9 percent of branches, and 5.7 percent of all bank loans. Home mortgages represented 26.9 percent, loans to small businesses represented 19.4 percent, and small loans to farms represented 3.4 percent of lending in the State of PA rating area. Home mortgages represented 69.7 percent, loans to small businesses represented 30.2 percent, and small loans to farms represented 0.1 percent of lending in the Harrisburg CSA. The bank chose full counties in the AA. FNB PA offers a full range of loan and deposit products and services in its AA through its branches. There are 30 financial institutions in the AA and the three largest represent 44.8 percent of deposits.

Based on FDIC deposit market share data as of June 30, 2023, the bank had \$2.4 billion in deposits representing a 7.6 percent deposit market share and is ranked fourth out of 30 financial institutions doing business in the AA. The largest depository institutions include PNC Bank, Manufacturers and Traders Trust Company, and Fulton.

The evaluation period considers demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for each analysis period.

Table A – Demographic Information of the Assessment Area**Assessment Area: Harrisburg CSA 2021**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	235	10.6	16.6	54.0	17.9	0.9
Population by Geography	1,087,957	6.7	13.0	59.0	20.7	0.6
Housing Units by Geography	459,846	7.2	14.2	59.0	19.6	0.0
Owner-Occupied Units by Geography	298,504	2.9	10.0	63.1	24.0	0.0
Occupied Rental Units by Geography	126,752	14.8	22.5	51.4	11.3	0.0
Vacant Units by Geography	34,590	16.5	20.2	51.0	12.3	0.0
Businesses by Geography	100,738	6.9	14.8	56.9	21.4	0.0
Farms by Geography	3,598	1.4	5.5	71.4	21.7	0.0
Family Distribution by Income Level	284,003	19.4	18.3	22.3	40.0	0.0
Household Distribution by Income Level	425,256	22.4	16.9	19.6	41.1	0.0
Median Family Income MSA - 25420 Harrisburg-Carlisle, PA MSA		\$71,723	Median Housing Value			\$166,518
Median Family Income MSA - 30140 Lebanon, PA MSA		\$65,676	Median Gross Rent			\$849
Median Family Income MSA - 49620 York-Hanover, PA MSA		\$69,846	Families Below Poverty Level			7.8%

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						
Assessment Area: Harrisburg CSA 2022 - 2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	263	9.1	14.4	54.4	21.3	0.8
Population by Geography	1,145,565	6.6	12.6	56.3	24.0	0.5
Housing Units by Geography	474,764	6.7	13.6	56.9	22.7	0.0
Owner-Occupied Units by Geography	311,117	2.8	9.8	60.2	27.2	0.0
Occupied Rental Units by Geography	132,100	14.2	21.3	50.6	13.8	0.0
Vacant Units by Geography	31,547	14.3	18.6	51.2	15.9	0.0
Businesses by Geography	121,597	6.6	14.7	53.7	24.9	0.0
Farms by Geography	4,302	1.5	7.5	68.4	22.6	0.0
Family Distribution by Income Level	291,236	18.9	18.7	23.2	39.1	0.0
Household Distribution by Income Level	443,217	22.3	16.8	19.8	41.1	0.0
Median Family Income MSA - 25420 Harrisburg-Carlisle, PA MSA		\$84,347	Median Housing Value			\$183,614
Median Family Income MSA - 30140 Lebanon, PA MSA		\$76,282	Median Gross Rent			\$973
Median Family Income MSA - 49620 York-Hanover, PA MSA		\$82,154	Families Below Poverty Level			6.4%
<i>Source: 2020 U.S. Census and 2023 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>						

Harrisburg, PA

According to the 2023 Moody's Analytics report, the MSA's strengths included its central location in the state with strong transportation and distribution assets, low cost of doing business and living in comparison to other large northeastern metropolitans, and positive population and migration trends. The MSA's employment growth was outpacing the Northeast and nation, specifically with gains in the healthcare, leisure/hospitality, and transportation/warehousing sectors. The 2023 unemployment rate for the MSA was 3.4 percent compared to 5.2 percent in 2021. The leading industries by wage tier included general medical and surgical hospitals, management of companies and enterprises, federal government, offices of physicians, and state government. Major employers included UPMC, The Hershey Company, Penn State Health, Harrisburg Area Community College, and Hershey Entertainment and Resorts.

Lebanon, PA

According to the 2023 Moody's Analytics report, the MSA's strengths included its proximity to the large southeastern Pennsylvania market, good transportation infrastructure, affordable housing with a low cost of living, and positive migration trends. Gains in nonfarm payrolls, including the manufacturing and construction sectors, and the moderation of single-family house prices contributed to the MSA's growth. The 2023 unemployment rate for the MSA was 3.4 percent compared to 5.2 percent in 2021. The leading industries by wage tier included federal government, pharmaceutical and medicine manufacturing, management of companies and enterprises, other food manufacturing, and local government. Major employers included Sechler Family Foods, Lebanon VA Medical Center, Wellspan Good Samaritan Hospital, Good Samaritan Health System, and Lebanon Valley College.

York, PA

According to the 2023 Moody's Analytics report, the MSA's strengths included its establishment of large firms, strong transportation linkages, and reliable work for military contractors and manufacturing. The MSA's growth lagged both the state and nation and is expected to continue the trend. The MSA's lower unemployment rate was in direct correlation to its shrinking workforce. The 2023 unemployment rate for the MSA was 3.6 percent compared to 5.2 percent in 2021. The leading industries by wage tier included offices of physicians, federal government, management of companies and enterprises, converted paper product manufacturing, and local government. Major employers included Wellspan Medical Group, Rutter's Holdings, Inc., Stewart Group, Inc., Kingsley Construction, Inc., and Spiritrust Lutheran.

Community Contacts

Examiners reviewed five community contacts completed during the review period with organizations serving the area. These organizations focus on affordable housing, economic development, and community services targeted to LMI individuals. In addition to monetary credit and investment needs, contacts expressed the need for products and services that serve as entry points for underbanked and unbanked individuals.

Credit and CD needs identified include:

- Affordable housing for rent and purchase
- Economic development benefitting LMI communities
- Serving underbanked and unbanked individuals

Opportunities for participation by financial institutions include the following:

- Providing financing for purchasing and renting affordable housing
- Providing financing to small businesses
- Providing banking products for underbanked and unbanked individuals

PA Non-MSA

The PA Non-MSA represents 4 percent of deposits, 5.2 percent of branches, and 3.9 percent of all bank loans. Home mortgages represented 16 percent, loans to small businesses represented 16.2 percent, and small loans to farms represented 30.3 percent of lending in the State of Pennsylvania rating area. Home mortgages represented 61.2 percent, loans to small businesses represented 37.3 percent, and small loans to farms represented 1.5 percent of lending in the PA Non-MSA. The bank chose full counties in the AA. The bank offers a full range of loan and deposit products and services in its AA through its branches. There are 45 financial institutions in the AA and the three largest represent 28.5 percent of deposits.

Non-MSA counties that were not included in a CSA were combined into the PA Non-MSA AA for analysis and conclusions on performance. Refer to Appendix A: Scope of the Examination – List of Assessment Areas and Type of Examination for the counties used to form the AAs.

Based on FDIC deposit market share data as of June 30, 2023, the bank had \$1.4 billion in deposits in the AA representing a 10.6 percent deposit market share. It is ranked first out of 45 financial institutions doing business in the AA.

The evaluation period considers demographic information from both the 2010 U.S. Census with 2015 American Community Survey (ACS) data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for each analysis period.

Table A – Demographic Information of the Assessment Area						
Assessment Area: PA Non-MSA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	146	0.0	15.1	73.3	8.9	2.7
Population by Geography	580,173	0.0	11.2	77.1	9.9	1.8
Housing Units by Geography	270,556	0.0	12.7	78.2	9.0	0.1
Owner-Occupied Units by Geography	170,359	0.0	8.9	80.4	10.6	0.0
Occupied Rental Units by Geography	59,045	0.0	21.2	71.5	7.2	0.1
Vacant Units by Geography	41,152	0.0	16.1	78.7	5.2	0.1
Businesses by Geography	39,436	0.0	11.8	75.1	13.0	0.1
Farms by Geography	2,348	0.0	2.0	84.3	13.6	0.0
Family Distribution by Income Level	152,938	19.3	18.9	21.8	40.0	0.0
Household Distribution by Income Level	229,404	22.7	17.1	18.1	42.1	0.0
Median Family Income Non-MSAs - PA		\$56,172	Median Housing Value			\$111,553
			Median Gross Rent			\$634
			Families Below Poverty Level			9.6%
<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>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: PA Non-MSA 2022 - 2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	156	1.3	12.8	71.8	11.5	2.6
Population by Geography	559,184	1.4	9.6	74.7	13.2	1.1
Housing Units by Geography	274,728	1.8	11.1	75.1	11.5	0.5
Owner-Occupied Units by Geography	170,124	1.1	7.9	77.0	13.6	0.3
Occupied Rental Units by Geography	59,174	2.7	17.7	71.2	7.4	1.0
Vacant Units by Geography	45,430	2.8	14.5	73.2	8.9	0.6
Businesses by Geography	46,173	1.3	8.8	74.4	14.3	1.2
Farms by Geography	2,751	0.0	2.3	82.1	15.2	0.4
Family Distribution by Income Level	150,958	18.9	18.5	21.8	40.8	0.0
Household Distribution by Income Level	229,298	23.1	16.3	17.8	42.8	0.0
Median Family Income Non-MSAs - PA		\$65,202	Median Housing Value			\$128,527
			Median Gross Rent			\$702
			Families Below Poverty Level			8.5%
<i>Source: 2020 U.S. Census and 2023 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>						

Community Contacts

Examiners reviewed five community contacts completed during the review period with organizations serving the area. These organizations focus on economic development, affordable housing, revitalization and stabilization efforts, and community services targeted to LMI individuals. In addition to monetary credit and investment needs, contacts noted a need for workforce development programs including entrepreneurial development activities. Contacts noted nonprofit organizations are looking to collaborate with banks to keep programs funded and increase opportunities to assist additional small businesses.

Credit and CD needs identified include:

- Economic development supporting LMI communities
- Affordable housing for rent and purchase
- Revitalization and stabilization efforts benefitting LMI communities

Opportunities for participation by financial institutions include the following:

- Providing small business financing
- Providing financing for affordable housing
- Providing financing for revitalization and stabilization efforts

Scope of Evaluation in Pennsylvania

Examiners conducted a full-scope review of the Harrisburg CSA and PA Non-MSA. The AAs were chosen for full-scope reviews because they represent more than 39.4 percent of lending, deposits, and

branches in the rating area. While the Harrisburg CSA and PA Non-MSA represent a large portion of the state, the overall conclusions and rating for the state consider all activities within all assessment areas. Home mortgage loans were given more weight than small business loans when arriving at the bank's overall lending performance based on the volume of loans in all AAs except the East Stroudsburg MSA where small business loans were given more weight than home mortgage loans.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN PENNSYLVANIA

LENDING TEST

The bank's performance under the Lending Test in Pennsylvania is rated Outstanding. Performance in the limited-scope AAs had a neutral impact on the overall Lending Test conclusion for the State of Pennsylvania.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in both the Harrisburg CSA and in the PA Non-MSA was excellent.

Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Altoona CSA	859	586	12	5	1,462	9.7	9.8
East Stroudsburg MSA	57	67	1	0	125	0.9	0.6
Erie CSA	1,087	881	11	9	1,988	13.1	15.5
Harrisburg CSA	2,517	1,089	4	13	3,623	23.9	25.0
Johnstown CSA	1,355	657	13	7	2,032	13.4	12.1
Lancaster MSA	506	358	1	7	872	5.8	4.7
PA Non-MSA	1,492	911	36	6	2,445	16.1	14.4
Scranton MSA	630	431	0	2	1,063	7.0	6.7
State College MSA	619	461	19	4	1,103	7.3	8.8
Williamsport CSA	223	186	22	0	431	2.8	2.4
Total	9,345	5,627	119	53	15,144	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* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Altoona CSA	106,035	50,879	464	11,209	168,587	7.1	9.8
East Stroudsburg MSA	12,355	11,399	68	0	23,822	1.0	0.6
Erie CSA	148,395	116,828	696	21,716	287,635	12	15.5
Harrisburg CSA	591,545	122,135	469	47,011	761,160	31.9	25.0
Johnstown CSA	144,015	57,861	293	21,888	224,057	9.4	12.1
Lancaster MSA	131,120	60,296	315	10,235	201,966	8.5	4.7
PA Non-MSA	182,310	92,769	1,761	12,269	289,109	12.1	14.4
Scranton MSA	107,070	53,876	0	31,589	192,535	8.1	6.7
State College MSA	115,655	44,212	1,917	23,541	185,325	7.8	8.8
Williamsport CSA	32,385	14,604	1,916	0	48,905	2.1	2.4
Total	1,570,885	624,859	7,899	179,458	2,383,101	100.0	100.0

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

Harrisburg CSA

Lending levels reflected good responsiveness to AA credit needs.

Based on the June 30, 2023, FDIC Summary of Deposit Market Share Report, the bank ranked fourth out of 30 FDIC-insured depository institutions (top 14 percent) with a 7.6 percent deposit market share.

For home mortgage loans, the bank's market share of 2.6 percent ranked eighth out of 518 lenders (top two percent). The top three lenders were Members First Federal Credit Union with 12.3 percent market share, PA State Employees' Credit Union with 5.1 percent market share, and Rocket Mortgage with 3.9 percent market share.

For small loans to businesses, the bank's market share of 0.8 percent ranked 20th out of 136 lenders (top 15 percent). The top three lenders were American Express with 20.7 percent market share, JPMorgan Chase with 11.4 percent market share, and US Bank with 10.3 percent market share. The top three small business lenders were institutions with large business credit card portfolios with average loan sizes of \$13,000 or less. The bank's average small business loan size was \$170,000.

PA Non-MSA

Lending levels reflected good responsiveness to AA credit needs.

Based on the June 30, 2023, FDIC Summary of Deposit Market Share Report, the bank ranked first out of 45 FDIC-insured depository institutions with a 10.6 percent deposit market share.

For home mortgage loans, the bank's market share of 4 percent ranked third out of 413 lenders. The top two lenders were Rocket Mortgage with 6.2 percent market share, and PA State Employees' Credit Union with 5.6 percent market share.

For small loans to businesses, the bank's market share of 2.3 percent ranked 10th out of 111 lenders. The top three lenders were American Express with 16.3 percent market share, Synchrony Bank with 10.7 percent market share, and JPMorgan Chase Bank with 10.6 percent market share. The top three small business lenders were institutions with large business credit card portfolios with average loan sizes of \$11,000 or less. The bank's average small business loan size was \$132,000.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AAs. Examiners generally placed more emphasis on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units and small businesses.

Home Mortgage Loans

Refer to Table O in the State of Pennsylvania 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.

The overall geographic distribution of home mortgage loans was adequate.

Harrisburg CSA

The geographic distribution of home mortgage loans was adequate.

2021

The percentage of home mortgage loans originated or purchased in low-income geographies was below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies was below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

2022-2023

The percentage of home mortgage loans originated or purchased in low-income geographies was well below the percentage of owner-occupied housing units located in those geographies and was significantly below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies was near to the percentage of owner-occupied housing units located in those geographies and was below the aggregate percentage of all reporting lenders.

PA Non-MSA

The geographic distribution of home mortgage loans was good.

2021

There were no geographies designated as low-income during the 2021 period. The percentage of home mortgage loans originated or purchased in moderate-income geographies was near to the percentage of owner-occupied housing units located in those geographies but exceeded the aggregate percentage of all reporting lenders.

2022-2023

There were only two low-income geographies in the AA and both were in Schuylkill County. Only 1.1 percent of owner-occupied housing units were in the two low-income geographies. Examiners considered the limited number of owner-occupied housing units in low-income geographies, which constrained the ability of the bank and other lenders to make loans in those geographies. The percentage of home mortgage loans originated or purchased in low-income geographies was significantly below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in

moderate-income geographies exceeded the percentage of owner-occupied housing units located in those geographies and approximated the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table Q in the State of Pennsylvania 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.

The geographic distribution of small loans to businesses was excellent.

Harrisburg CSA

The geographic distribution of small loans to businesses was excellent.

2021

The percentage of small loans to businesses originated or purchased in low-income geographies approximated the percentage of businesses located in those geographies and exceeded the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

2022-2023

The percentage of small loans to businesses originated or purchased in low-income geographies was below the percentage of businesses located in those geographies but exceeded the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies was below the percentage of businesses located in those geographies but approximated the aggregate percentage of all reporting lenders.

PA Non-MSA

The geographic distribution of small loans to businesses was good.

2021

There were no geographies designated as low-income during the 2021 period. The percentage of small loans to businesses originated or purchased in moderate-income geographies was below the percentage of businesses located in those geographies but equaled the aggregate percentage of all reporting lenders.

2022-2023

There were only two low-income geographies in the AA, and both were in Schuylkill County. Only 1.3 percent of the businesses in the AA were in these two low-income geographies. Examiners considered the limited number of businesses in low-income geographies, which constrained the ability of the bank and other lenders to make loans in those geographies. The percentage of small loans to businesses originated or purchased in low-income geographies was well below the percentage of businesses located in those geographies but equaled the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies was significantly below the percentage of businesses located in those geographies and was well below the aggregate percentage of all reporting lenders.

Lending Gap Analysis

The OCC reviewed summary reports, maps, and home mortgage and small business lending activity to identify gaps in the geographic distribution of loans in the full-scope AA. The OCC did not identify any unexplained conspicuous gaps in the full-scope area reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an adequate distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

Refer to Table P in the State of Pennsylvania 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.

The distribution of home mortgage loans among individuals of different income levels was adequate.

Harrisburg CSA

The distribution of home mortgage loans among individuals of different income levels was adequate. Examiners considered the housing costs in relation to the median family incomes and the increase in home values during the evaluation period, which limited the affordability for some low-income borrowers.

2021

The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below the percentage of those families and was below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers was near to both the percentage of those families and the aggregate percentage of all reporting lenders.

2022-2023

The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below the percentage of those families and was below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers was near to the percentage of those families and was below the aggregate percentage of all reporting lenders.

PA Non-MSA

The distribution of home mortgage loans among individuals of different income levels was good. Examiners considered the housing costs in relation to the median family incomes and the increase in home values during the evaluation period. Based on this analysis, housing is affordable for LMI borrowers.

2021

The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below the percentage of those families but was near to the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers was near to the percentage of those families and approximated the aggregate percentage of all reporting lenders.

2022-2023

The percentage of home mortgage loans originated or purchased to low-income borrowers was well below the percentage of those families but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded the percentage of those families and was near to the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table R in the State of Pennsylvania 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.

The distribution of loans to businesses of different sizes was good.

Harrisburg CSA

The distribution of loans to businesses of different sizes was good.

2021

The percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with revenues of \$1 million or less but exceeded the aggregate percentage of all reporting lenders.

2022-2023

The percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with revenues of \$1 million or less but exceeded the aggregate percentage of all reporting lenders.

PA Non-MSA

The distribution of loans to businesses of different sizes was good.

2021

The percentage of small loans to businesses with revenues of \$1 million or less was near to the percentage of businesses with revenues of \$1 million or less but exceeded the aggregate percentage of all reporting lenders.

2022-2023

The percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with revenues of \$1 million or less but exceeded the aggregate percentage of all reporting lenders.

Community Development Lending

The bank was a leader in making CD loans.

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.

Harrisburg CSA

The volume of CD lending was excellent and had a positive impact on the Lending Test conclusion. During the evaluation period, the bank originated 13 CD loans totaling \$47 million or 17.9 percent of allocated tier 1 capital. The bank's CD loans were responsive to community needs. The institution did not utilize complex or innovative CD loans. By dollar volume, 32.6 percent funded economic development, 46.1 percent funded affordable housing, and 21.3 percent funded community services.

The following are examples of the bank's CD loans that illustrate the complexity or responsiveness of the bank's CD lending:

- A \$10 million loan to finance the demolition of 32 structures and the construction of an apartment complex. The project includes all 50 units of affordable housing and a community center. LIHTC restrictions limiting households to those earning 60 percent or less of the area median income secured all units. This loan was part of a complex financing package consisting of multiple sources.
- A \$9.8 million loan to finance the construction of a new apartment complex. The project included the demolition of a dilapidated public housing project to be replaced with 50 units of affordable housing apartments. LIHTC restrictions limiting households to those earning 80 percent or less of the area median income secured all units, with the majority (90 percent) of units reserved for individuals earning 60 percent or less of the area median income. This project was responsive to the identified need for affordable housing and involved complex financing, including LIHTCs.
- A \$1.9 million commercial mortgage loan to preserve 55-units of naturally occurring affordable housing in a moderate-income geography. More than half of the units are single-room occupancy or studio units with rents below the HUD Fair Market Rents for the County.
- The bank's participation in the PPP resulted in six CRA qualified SBA loans totaling \$36.2 million. These loans were made for a qualified CD purpose and/or to nonprofits providing CD activities and services in the AA.

PA Non-MSA

The volume of CD lending was excellent and had a positive impact on the Lending Test conclusion. During the evaluation period, the bank originated six CD loans totaling \$12.3 million or 8.1 percent of allocated tier 1 capital. The bank's CD loans were responsive to community needs. The institution did not utilize complex or innovative CD loans. By dollar volume, 75.5 percent funded economic development and 24.5 percent funded affordable housing.

The following are examples of the bank's CD loans that illustrate the responsiveness of the bank's CD lending:

- A \$3 million loan to renovate facilities for a nonprofit organization supporting LMI youths. The organization specialized in providing residential services, counseling, and education to at-risk youths.
- The bank's participation in the PPP resulted in four CRA qualified SBA loans totaling \$6.4 million. These loans were made for a qualified CD purpose and/or to nonprofits providing CD activities and services in the AA.

Broader Statewide Area

The bank originated eight CD loans totaling \$21.9 million in the statewide area that do not have a P/M/F of serving the bank’s AAs. The CD lending further supported the overall Outstanding Lending Test rating for the State of Pennsylvania.

Product Innovation and Flexibility

The institution made extensive use of innovative and/or flexible lending practices to serve AA credit needs. For a description of these products see the “Innovative and Flexible Product” section of the Overall Description of institution.

Harrisburg CSA

As shown in the table below, the bank originated or purchased 131 loans under its flexible lending programs totaling \$28.6 million.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
FHA	17	3,737
FNB Home Rehabilitation Program	2	291
FNB Homeownership Program	70	11,991
Home Possible Freddie Mac	2	361
Home Ready Fannie Mae	16	2,691
U.S. Department of Agriculture	1	158
U.S. Department of Veterans Affairs	23	9,328
Total	131	28,557

PA Non-MSA

As shown in the table below, the bank originated or purchased 71 loans under its flexible lending programs totaling \$9 million.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
FHA	9	1,669
FNB Home Rehabilitation Program	1	51
FNB Homeownership Program	47	4,862
Home Possible Freddie Mac	4	785
Home Ready Fannie Mae	1	78
U.S. Department of Agriculture	5	585
U.S. Department of Veterans Affairs	4	959
Total	71	8,989

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s performance under the Lending Test in the Johnstown CSA, Lancaster MSA, and State College MSA was consistent with the bank’s overall performance under the Lending Test in the full-scope areas. The bank’s performance under the Lending Test in the Altoona CSA, East Stroudsburg MSA, Erie CSA, Scranton MSA, and Williamsport CSA was weaker than the bank’s overall performance under the Lending Test in the full-scope areas. The weaker performance in the Altoona CSA, Erie CSA, and Scranton MSA and was due to a weaker geographic distribution. The

weaker performance in the East Stroudsburg MSA was due to no CD lending in the AA. The weaker performance in the Williamsport CSA was due to a weaker geographic distribution and no CD lending in the AA. Performance in the limited-scope AAs had a neutral impact on the overall Lending Test conclusion for the State of Pennsylvania.

Refer to Tables O through T in the State of Pennsylvania section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Pennsylvania is rated Outstanding. Performance in the limited-scope AAs had a neutral impact on the Investment Test conclusion for the State of Pennsylvania.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Harrisburg CSA and PA Non-MSA is excellent.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Altoona CSA	5	1,830	14	35	19	8.8	1,865	2.2	1	49
East Stroudsburg MSA	0	0	0	0	0	0.0	0	0.0	0	0
Erie CSA	13	11,170	34	5,020	47	21.7	16,191	19.4	4	2,439
Harrisburg CSA	16	8,769	46	11,636	62	28.6	20,405	24.4	3	979
Johnstown CSA	7	5,028	0	0	7	3.2	5,028	6.0	2	1,263
Lancaster MSA	7	10,852	20	960	27	12.4	11,812	14.1	0	0
PA Non-MSA	7	4,858	15	6,684	22	10.1	11,542	13.8	1	43
Scranton MSA	1	3,821	8	29	9	4.1	3,841	4.6	0	0
State College MSA	3	6,843	17	6,045	20	9.2	12,888	15.5	2	816
Williamsport CSA	1	17	3	2	4	1.9	18	0.0	0	0
Total	60	53,188	157	30,411	217	100	83,590	100	13	5,5890

The tables present the data for the entire rating area. The narrative below addresses performance in full-scope areas only.

** 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 bank's financial reporting system.*

Harrisburg CSA

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

The institution exhibits good responsiveness to credit and community economic development needs. The institution occasionally uses innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

The dollar volume of current- and prior- period investments represented 7.8 percent of allocated tier 1 capital. Current period investments included 40 qualifying grants and donations totaling \$189,750 to 27 organizations. By dollar volume, 7.9 percent of these investments funded affordable housing, 18.2 percent funded economic development, and 73.9 percent funded community services targeted to LMI individuals.

Examples of community development investments include:

- A complex and responsive \$6.2 million investment in a LIHTC and provided financing to support the development of 50 affordable housing units. The property will set aside units at 20 percent, 50 percent, and 60 percent of area median income. All units are available to those 55 years and older. The investment supports a three-story garden-style walk-up residential building that will include one-bedroom, two-bedroom, and three-bedroom units.
- A \$2.6 million investment in a LIHTC supporting the development of 16 affordable housing units located in a 17 unit garden apartment development for families making less than 80 percent of the area median income.
- A \$15,000 investment in a nonprofit organization providing affordable housing to LMI individuals and families. The investment will support the construction of six new affordable townhomes for families with incomes less than 80 percent of the area median income.

PA Non-MSA

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

The institution exhibits good responsiveness to credit and community economic development needs. The institution occasionally uses innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

The dollar volume of current- and prior- period investments represented 7.6 percent of allocated tier 1 capital. Total qualified investments included 14 qualifying grants and donations totaling \$69,325 to 10 organizations. By dollar volume, 0.1 percent of these investments funded affordable housing, 20.2 percent funded economic development, and 79.7 percent funded community services targeted to LMI individuals.

Examples of community development investments include:

- The bank provided a \$6.6 million investment in a LIHTC to support the development of 44 affordable housing units. The property will provide 21 units of affordable housing for households earning at or below 60 percent of the area median income, 16 are accessible to those at or below 50 percent of the area median income, four at or below 30 percent of the area median income, and three at or below 20 percent of the area median income. The units will include 39 one-bedroom and five two-bedroom units designed to serve seniors aged 62 and older.

- A \$150,000 investment in a nonprofit organization supporting the responsible and efficient use of land in the State of Pennsylvania. The investment will improve conditions as part of a neighborhood revitalization plan.
- A \$10,000 investment in a nonprofit organization supporting the redevelopment of a pedestrian business district. The investment will support the creation of a 25 space parking lot in the business district which will benefit local small businesses allowing for increased foot traffic.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Johnston CSA is consistent with the bank's overall performance under the investment test in the full-scope areas. Based on limited-scope reviews, the bank's performance under the Investment Test in the Erie CSA and State College MSA is stronger than the bank's overall performance under the Investment Test in the full-scope areas due to a higher volume of qualified investments. Based on limited-scope reviews, the bank's performance under the investment test in the Altoona CSA, East Stroudsburg MSA, Lancaster MSA, Scranton MSA, and Williamsport CSA is weaker than the bank's overall performance under the Investment Test in the full-scope areas due to a lower volume of qualified investments. The bank's performance under the Investment Test in the limited-scope areas had a neutral impact on the bank's overall Investment Test rating for the State of Pennsylvania.

Broader Statewide and Regional Investments

The bank was responsive to community development needs and opportunities in its AAs and examiners considered 11 CD investments totaling \$ 12.1 million in the broader statewide and regional areas that include the bank's AAs but do not have a P/M/F to specifically serve those AAs. These investments had a neutral impact on the Investment Test rating.

SERVICE TEST

The bank's performance under the Service Test in Pennsylvania is rated High Satisfactory. Performance in the limited-scope AAs had a neutral impact on the Service Test conclusion for the State of Pennsylvania.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Harrisburg CSA was excellent and the PA Non-MSA AAs was good.

Retail Banking Services

Service delivery systems were accessible to geographies and individuals of different income levels in the institution'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	NA	Low	Mod	Mid	Upp	NA	
Altoona CSA	9.8	7	7.6	0.0	28.6	42.8	28.6	0.0	1.9	20.1	58.0	20.0	0.0	
East Stroudsburg MSA	0.6	1	1.1	0.0	0.0	0.0	100.0	0.0	0.0	7.5	76.8	14.6	1.1	
Erie CSA	15.5	11	12.0	9.0	18.2	36.4	36.4	0.0	8.1	18.9	41.0	30.2	1.8	
Harrisburg CSA	25.0	17	18.5	5.9	23.5	52.9	17.7	0.0	6.6	12.6	56.3	24.0	0.0	
Johnstown CSA	12.1	14	15.2	7.1	14.3	57.1	21.4	0.0	3.8	10.6	61.3	24.3	0.0	
Lancaster MSA	4.7	4	4.3	0.0	0.0	25.0	75.0	0.0	2.9	12.8	71.4	12.9	0.0	
PA Non-MSA	14.4	18	19.6	0.0	22.2	77.8	0.0	0.0	1.4	9.6	74.7	13.2	1.1	
Scranton MSA	6.7	9	9.8	11.2	22.2	44.4	22.2	0.0	3.0	26.1	45.6	24.8	0.5	
State College MSA	8.8	8	8.7	0.0	12.5	12.5	25.0	50.0	3.6	14.8	49.2	20.8	11.6	
Williamsport CSA	2.4	3	3.3	0.0	0.0	66.7	0.0	33.3	3.4	5.1	71.8	17.7	2.0	

Harrisburg CSA

The bank has 17 branches within the AA, with one branch in a low-income CTs and four branches in moderate-income CTs. The bank's distribution of branches in low-income geographies was near to, and in moderate-income geographies exceeded, the percentage of the population living within those geographies. Examiners considered two branches in a middle-income CTs that benefited LMI customers based on data provided by the bank. These branches had a neutral impact on the service delivery system conclusion.

The bank offered several ADS options including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options which provided additional delivery availability and access to banking services to both retail and business customers. The bank operated 20 deposit-taking ATMs in the AA with 5.9 percent in low-income geographies and 23.5 percent in moderate-income geographies. The bank provided data on customer digital usage. The data analysis had minimal impact on the Service Test conclusion.

PA Non-MSA

The bank has 18 branches within the AA, with four branches in moderate-income CTs. The bank's distribution of branches in low-income geographies was significantly below, and in moderate-income geographies exceeded, the percentage of the population living within those geographies. Examiners considered one branch in an upper-income CT that was "across the street" and benefited LMI customers.

based on data provided by the bank. This branch had a neutral impact on the service delivery system conclusion.

The bank offered several ADS options including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options which provided additional delivery availability and access to banking services to both retail and business customers. The bank operated 24 deposit-taking ATMs in the AA with 22.2 percent in moderate-income geographies. The bank provided data on customer digital usage. The data analysis had a minimal impact on the Service Test conclusion.

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
Altoona CSA	0	2	0	0	-2	0
East Stroudsburg MSA	0	0	0	0	0	0
Erie CSA	0	2	0	0	-2	0
Harrisburg CSA	0	4	0	0	-4	0
Johnstown CSA	0	2	0	-1	-1	0
Lancaster MSA	0	0	0	0	0	0
PA Non-MSA	0	4	0	-1	-3	0
Scranton MSA	0	1	0	0	-1	0
State College MSA	0	2	0	0	0	-2
Williamsport CSA	0	1	0	0	-1	0

Harrisburg CSA

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.

During the evaluation period, the bank closed four branches, none of which were in LMI geographies. The bank did not open any branches during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. Branches were generally open from 9:00 a.m. to 5:00 p.m. on Monday through Thursday, 9:00 a.m. to 6:00 p.m. on Fridays, and 9:00 a.m. to 12:00 p.m. on Saturday.

PA Non-MSA

To the extent changes have been made, the institution's opening and closing of branches has adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.

During the evaluation period, the bank closed four branches, with one branch located in a moderate-income geography and three located in middle-income geographies. The bank did not open any branches during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. Most branches were open from 8:30 a.m. to 4:00 p.m. on Monday through Thursday, 9:00 a.m. to 6:00 p.m. on Fridays, and 8:30 a.m. to 12:00 p.m. on Saturday. Of the five branches not opened on Saturdays, only one was in a moderate-income geography.

Community Development Services

The institution provided a low level of CD services.

Harrisburg CSA

The institution provided a low level of CD services.

Bank employees provided 13 qualified CD service activities to six organizations with 101 qualified hours within this AA during the evaluation period. Leadership was evident through board or committee participation in three of these activities with bank executives providing four service hours. The bank's assistance was responsive to identified needs in the AA, particularly through community services and economic development.

Service activity examples during the evaluation period include:

- A bank employee provided 30 hours serving as a board member for a nonprofit organization that supports LMI individuals with transportation assistance, vouchers for clothing and household goods, and a food pantry. The organization provides access to Emergency Food Pantries and Soup Kitchens to help those facing food insecurity.

PA Non-MSA

The institution provided a low level of CD services.

Bank employees provided 22 qualified CD service activities to 13 organizations with 143 qualified hours within this AA during the evaluation period. Leadership was evident through board or committee participation in 19 of these activities with bank executives providing 115 service hours. The bank's assistance was responsive to identified needs in the AA, particularly community services and economic development.

Service activity examples during the evaluation period include:

- A bank employee served as the board treasurer and provided 12 hours to an organization that provides a food pantry and summer lunch program to LMI individuals.
- A bank employee served as a board member and provided 12 hours to an organization that primarily focused on supportive services to assist disabled and/or disadvantaged individuals. The organization offers programs and services such as job training, job placement, and mental health services.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance in the Erie CSA and Johnstown CSA is stronger than the bank's overall performance. Stronger performance is due to excellent distribution of branches in LMI geographies. The bank's performance in the Altoona MSA and Scranton MSA is consistent with the bank's overall performance under the Service Test in the full-scope areas. The bank's performance under the Service Test in the East Stroudsburg MSA, Lancaster MSA, State College MSA and Williamsport MSA is weaker than the bank's overall performance under the Service Test in the full-scope areas. The weaker performance is due to branch distribution in LMI geographies. Performance in the limited-scope AAs had a neutral impact with no change in the overall service test conclusion.

State Rating

State of South Carolina

CRA rating for the State of South Carolina⁹: Satisfactory

The Lending Test is rated: Outstanding

The Investment Test is rated: High Satisfactory

The Service Test is rated: Needs to Improve

The major factors that support this rating include:

- Lending levels reflected good responsiveness to AA credit needs.
- The geographic distribution of the bank’s loans was adequate. Performance in the limited-scope AA had a positive impact on the overall geographic distribution.
- The distribution of the bank’s loans among individuals of different income levels and businesses of different sizes was adequate. Performance in the limited-scope AA had a positive impact on the overall borrower distribution.
- The bank was a leader in making CD loans. CD lending had a positive impact on the Lending Test rating.
- Qualified investments were excellent in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations. The institution rarely uses innovative and/or complex investments to support CD initiatives. Performance in the limited-scope AA had a negative impact on the Investment Test conclusion for the State of South Carolina.
- Service delivery systems were unreasonably inaccessible to geographies and individuals of different income levels in the bank’s AAs.
- The bank provided an adequate level of CD services. CD services were responsive in addressing community needs.

Description of Institution’s Operations in South Carolina

The bank’s AA in the Charleston MSA consists of Charleston County. The AA in the Greenville SC CSA consists of Cherokee and Greenville (added to the AA in 2023) Counties. The AA meets the requirements of the CRA and does not arbitrarily exclude any LMI geographies. Refer to Appendix A: Scope of the Examination – List of Assessment Areas and Type of Examination for the counties used to form the AAs.

⁹ 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.

Charleston MSA

The Charleston MSA represents 0.3 percent of deposits, 0.9 percent of branches, and 1.1 percent of all bank loans. Home mortgages represented 88.2 percent and loans to small businesses represented 69.5 percent of lending in the State of South Carolina rating area. Home mortgages represented 81.6 percent and loans to small businesses represented 18.4 percent of lending in the Charleston MSA. The bank chose full counties in the AA. The bank offers a full range of loan and deposit products and services in its AA through its branches. There are 30 financial institutions in the AA and the three largest represent 48.3 percent of deposits.

Based on FDIC deposit market share data as of June 30, 2023, the bank had \$90 million in deposits representing a 0.6 percent deposit market share and is ranked 23 out of 30 financial institutions doing business in the AA. The largest depository institutions include Wells Fargo Bank, NA, Bank of America, NA, Southstate Bank, NA, and Truist Bank.

The evaluation period considers demographic information from both the 2010 U.S. Census with 2015 American Community Survey (ACS) data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for each analysis period.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Charleston MSA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	86	16.3	17.4	26.7	36.0	3.5
Population by Geography	372,904	12.7	17.2	29.8	38.7	1.5
Housing Units by Geography	175,607	11.9	17.2	29.2	40.3	1.4
Owner-Occupied Units by Geography	89,750	6.4	14.8	31.4	46.9	0.5
Occupied Rental Units by Geography	58,268	20.3	21.1	29.7	26.6	2.3
Vacant Units by Geography	27,589	11.8	17.1	20.9	47.8	2.4
Businesses by Geography	40,086	11.5	16.5	25.6	44.1	2.3
Farms by Geography	904	5.6	15.3	39.0	39.3	0.8
Family Distribution by Income Level	87,214	22.8	15.2	17.6	44.4	0.0
Household Distribution by Income Level	148,018	26.0	15.0	16.4	42.6	0.0
Median Family Income MSA - 16700 Charleston-North Charleston, SC MSA		\$65,558	Median Housing Value			\$299,955
			Median Gross Rent			\$1,044
			Families Below Poverty Level			12.2%
<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>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Charleston MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	99	8.1	20.2	26.3	41.4	4.0
Population by Geography	408,235	7.7	19.9	25.5	45.3	1.7
Housing Units by Geography	191,521	7.1	19.9	25.5	44.9	2.6
Owner-Occupied Units by Geography	101,589	4.4	15.9	25.6	52.9	1.2
Occupied Rental Units by Geography	61,822	11.6	28.4	27.9	29.8	2.3
Vacant Units by Geography	28,110	6.7	15.9	20.1	49.0	8.3
Businesses by Geography	102,143	8.1	19.9	22.3	48.0	1.7
Farms by Geography	2,049	6.3	23.6	30.1	38.9	1.0
Family Distribution by Income Level	93,812	21.2	15.4	18.1	45.3	0.0
Household Distribution by Income Level	163,411	24.7	15.3	16.6	43.4	0.0
Median Family Income MSA - 16700 Charleston-North Charleston, SC MSA		\$82,122	Median Housing Value			\$391,798
			Median Gross Rent			\$1,286
			Families Below Poverty Level			7.7%
<i>Source: 2020 U.S. Census and 2023 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>						

Charleston, SC

According to the 2023 Moody's Analytics report, the MSA's strengths included a highly diverse economy with a modern port, positive migration trends, and the location of an aerospace products and parts manufacturing hub serving Boeing's production line. The MSA's job growth was among the top in the nation, with significant gains in the healthcare, tourism, and accounting sectors. The 2023 unemployment rate for the MSA was 2.7 percent compared to 3.6 percent in 2021. The leading industries by wage tier included federal government, offices of physicians, computer systems design and related services, aerospace product and parts manufacturing, and state government. Major employers included Joint Base Charleston, Medical University of South Carolina, Roper St. Frances Healthcare, The Boeing Company, and Trident Health System.

Community Contacts

Examiners reviewed three community contacts completed during the review period with organizations serving the area. These organizations focus on affordable housing, economic development, and community services targeted to LMI individuals. Contacts noted there is strong need for affordable housing as the increasing population and economic growth has increased the demand for housing.

Credit and CD needs identified include:

- Affordable housing for rent and purchase
- Financial literacy education
- Economic development benefitting LMI communities

Opportunities for participation by financial institutions include the following:

- Providing financing for affordable housing
- Providing financial literacy education to clients of nonprofit organizations
- Increasing cooperation with CD financial institutions

Scope of Evaluation in South Carolina

Examiners conducted a full-scope review of the Charleston MSA. The AA was chosen for full-scope review because it represents more than 60 percent of lending and branches in the rating area. Home mortgage loans were given more weight than small business loans when arriving at the bank’s overall lending performance based on the volume of loans in all AAs.

The Greenville-Anderson, SC MSA and one non-MSA County were combined into the Greenville SC CSA for analysis and conclusions on performance.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SOUTH CAROLINA

LENDING TEST

The bank’s performance under the Lending Test in South Carolina is rated Outstanding. Performance in the limited-scope review AA had a positive impact on the bank’s overall Lending Test rating for the State of South Carolina.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Charleston MSA was good.

Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Charleston MSA	547	123	0	11	681	83.8	49.1
Greenville CSA	73	54	0	5	132	16.2	50.9
Total	620	177	0	16	813	100.0	100.0

Dollar Volume of Loans* (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Charleston MSA	357,045	20,223	0	37,136	414,404	89.6	49.1
Greenville CSA	26,125	3,276	0	18,575	47,976	10.4	50.9
Total	383,170	23,499	0	55,711	462,080	100.0	100.0

Based on the June 30, 2023 FDIC Summary of Deposit Market Share Report, the bank ranked 23rd out of 30 FDIC-insured depository institutions (top 77 percent) with a 0.6 percent deposit market share.

For home mortgage loans, the bank's market share of 1.4 percent ranked 19th out of 493 lenders (top four percent). The top three lenders were Southstate Bank with 4.9 percent market share, First Citizens Bank and Trust with 4.7 percent market share, and Rocket Mortgage with 3.7 percent market share.

For small loans to businesses, the bank's market share of 0.1 percent ranked 39th out of 115 lenders (top 34 percent). The top three lenders were American Express with 28.3 percent market share, JPMorgan Chase Bank with 11.5 percent market share, and Bank of America with 9.3 percent market share. The top three small business lenders were institutions with large business credit card portfolios with average loan sizes of \$21,000 or less. The bank's average small business loan size was \$190,000.

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AA. Examiners generally placed more emphasis on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units and small businesses.

Home Mortgage Loans

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.

The overall geographic distribution of home mortgage loans was poor.

2021

The percentage of home mortgage loans originated or purchased in low-income geographies was significantly below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies was well below the percentage of owner-occupied housing units located in those geographies but was below the aggregate percentage of all reporting lenders.

2022-2023

The percentage of home mortgage loans originated or purchased in low-income geographies was well below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies was significantly below both the percentage of owner-

occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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.

The geographic distribution of small loans to businesses was excellent.

2021

The percentage of small loans to businesses originated or purchased in low-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies was near to the percentage of businesses located in those geographies and exceeded the aggregate percentage of all reporting lenders.

2022-2023

The percentage of small loans to businesses originated or purchased in low-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

Lending Gap Analysis

The OCC reviewed summary reports, maps, and home mortgage and small business lending activity to identify gaps in the geographic distribution of loans in the full-scope AA. The OCC did not identify any unexplained conspicuous gaps in the full-scope area reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an adequate distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

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.

The distribution of home mortgage loans among individuals of different income levels was poor. Examiners considered the housing costs in relation to the median family incomes and the increase in home values during the evaluation period, which limited the affordability for both LMI borrowers. LMI borrowers would have difficulty affording a mortgage in this AA.

2021

The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below the percentage of those families and was well below the aggregate percentage of all

reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers was significantly below the percentage of those families and was well below the aggregate percentage of all reporting lenders.

2022-2023

The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below both the percentage of those families and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers was significantly below the percentage of those families and was well below the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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.

The distribution of loans to businesses of different sizes was good.

2021

The percentage of small loans to businesses with revenues of \$1 million or less was near to the percentage of businesses with revenues of \$1 million or less but significantly exceeded the aggregate percentage of all reporting lenders.

2022-2023

The percentage of small loans to businesses with revenues of \$1 million or less was well below the percentage of businesses with revenues of \$1 million or less but was near to the aggregate percentage of all reporting lenders.

Community Development Lending

The institution was a leader in making CD loans.

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.

The volume of CD lending was excellent and had a positive impact on the Lending Test performance. During the evaluation period, the bank originated 11 CD loans totaling \$37.1 million or over 100 percent of allocated tier 1 capital. The bank's CD loans were responsive to community needs. The institution did not utilize complex or innovative CD loans. By dollar volume, 61.7 percent funded economic development, 21.5 percent funded affordable housing, and 16.8 percent funded revitalization and stabilization efforts.

The following examples demonstrate the bank's use of responsive CD loans:

- A \$7 million loan to a local college to assist low-income attendees and underprivileged students attain a high-quality education and bridge the gaps in educational achievement.

- The bank’s participation in the PPP resulted in two CRA qualified SBA loans totaling \$2.3 million. These loans were made for a qualified CD purpose and/or to nonprofits providing CD activities and services in the AA.

Broader Statewide or Regional area

The bank originated seven CD loans totaling \$14.2 million that do not have a P/M/F of serving the bank’s AAs. This CD lending further supported an Outstanding Lending Test rating for the State of South Carolina.

Product Innovation and Flexibility

The institution made limited use of innovative and/or flexible lending practices to serve AA credit needs. As shown in the table below, the bank originated or purchased 10 loans under its flexible lending programs totaling \$2.8 million. For a description of these products see the “Innovative and Flexible Product” section of the Overall Description of institution.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
FHA	5	1,768
Home Ready Fannie Mae	3	510
U.S. Department of Veterans Affairs	2	558
Total	10	2,836

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank’s performance under the Lending Test in the Greenville CSA was stronger than the bank’s overall performance under the Lending Test in the full-scope area. The bank’s geographic and borrower distributions were stronger than the full-scope area. Performance in the limited-scope review AA had a positive impact on the bank’s overall Lending Test rating for the State of South Carolina.

Refer to Tables O through T 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 the State of South Carolina is rated High Satisfactory. Performance in the limited-scope AA had a negative impact on the Investment Test conclusion for the State of South Carolina.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Charleston MSA is excellent.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Charleston MSA	1	3,751	8	1,312	9	52.9	5,064	99.5	0	0
Greenville SC CSA	0	0	8	27	8	47.1	27	0.5	0	0
Total	1	3,751	16	1,339	17	100	5,091	100	0	0

The tables present the data for the entire rating area. The narrative below addresses performance in full-scope areas only.

** 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 bank's financial reporting system.*

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

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution rarely uses innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

The dollar volume of current- and prior- period investments represented 50.7 percent of allocated tier 1 capital. Current period investments included 7 qualifying grants and donations totaling \$25,950 to five organizations. By dollar volume, 52 percent funded economic development and 48 percent funded community services targeted to LMI individuals.

Examples of community development investments include:

- A \$1.3 million investment to support the development of 12 affordable housing units to households earning at or below 30 percent of the area median income. The units will include 12 one-bedroom units.
- The purchase of two MBS pool investments totaling \$5 million. The investments include home mortgage loans to LMI individuals located in LMI geographies within the AA. The MBSs provided 63 affordable units.
- A \$10,000 investment supporting a designated SBA Women's Business Center and the development of entrepreneurship and start-up businesses.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Greenville SC CSA is weaker than the bank's overall performance under the Investment Test in the full-scope area due to a lower volume of qualified investments. Performance in the limited-scope AA had a negative impact on the overall Investment Test rating.

Broader Statewide and Regional Investments

The bank was responsive to community development needs and opportunities in its AAs, and examiners considered 6 CD investments totaling \$7.5 million in the broader statewide and regional areas that

include the bank’s AAs but do not have a P/M/F to specifically serve those AAs. These investments were consistent with the Investment Test rating in the rating area.

SERVICE TEST

The institution’s performance under the Service Test in the Charleston MSA is rated Needs to Improve. Performance in the limited-scope AA had a neutral impact on the Service Test conclusion for the State of South Carolina.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the institution’s performance in the Charleston MSA is poor.

Retail Banking Services

Service delivery systems were unreasonably inaccessible to portions of the AA, particularly LMI geographies and/or LMI individuals.

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	NA
Charleston MSA	49.1	3	60.0	0.0	0.0	0.0	100.0	7.7	19.9	25.5	45.3	1.7
Greenville CSA	50.9	2	40.0	0.0	0.0	50.0	50.0	3.8	18.6	35.3	41.7	0.6

Charleston MSA

The bank has three branches within the AA, with none located in LMI geographies. The bank’s distribution of branches in LMI geographies was significantly below the percentage of the population living within those geographies.

The bank offered several ADS options including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options which provided additional delivery availability and access to banking services to both retail and business customers. The bank operated 9 deposit-taking ATMs in the AA with none located in LMI geographies. The bank provided data on customer digital usage. The data analysis had neutral impact on the Service Test conclusion.

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
Charleston MSA	1	0	0	0	0	1
Greenville CSA	1	0	0	0	0	1

Charleston MSA

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.

During the evaluation period, the bank opened one branch, with none being in LMI geographies. The bank did not close any branches.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. Branches were generally open from 9:00 a.m. to 5:00 p.m. on Monday through Thursday, 9:00 a.m. to 6:00 p.m. on Fridays. None of the branches offer Saturday hours.

Community Development Services

The institution provided an adequate level of CD services.

Charleston MSA

The bank employees provided 12 qualified CD service activities to seven organizations with 111 qualified hours within this AA during the evaluation period. Leadership was evident through board or committee participation in seven of these activities with bank executives providing 70 service hours. The bank's assistance was responsive to identified needs in the AA, particularly through outreach to Hispanic populations in the community who are disproportionately burdened with significant housing problems.

Service activity examples during the evaluation period include:

- A bank employee served on the board of a local CDC. The employee spent a total of 90 minutes monthly serving as a board member. The organization's mission included outreach to the local Hispanic and Latin community. The CDC advocates for and supports Hispanic entrepreneurs in the area.
- A bank employee provided 54 hours serving on the board of a local CDC. The regional development organization's mission was to help businesses and entrepreneurs locate and expand in the greater

local community. The CDC streamlines the process and assists with talent acquisition, financing, and providing connectivity to supply chains.

- An additional bank employee served as a mentor to local LMI youth. The employee provided eight hours per quarter mentoring students in the local community. The organization's mission includes supporting local youth to build relationships with caring adults who empower them to reach their full potential.

Conclusions for Area Receiving a Limited-Scope Review

Based on limited-scope review, the bank's performance in the Greenville CSA is consistent with the bank's overall performance. Performance in the limited-scope AA had a neutral impact on the bank's overall Lending Test rating for the State of South Carolina.

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, 2021 through December 31, 2023 HMDA and Small business January 1, 2021 through December 31, 2023 Community development loans, investments, and services	
Bank Products Reviewed:	Home mortgage, small business, small farm Community development loans, qualified investments, community development services	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		
Charlotte MMSA	Full-scope	NC Iredell – 097, Mecklenburg – 119, Rowan – 159, Union – 179 SC - York - 91
Philadelphia CSA	Full-scope	PA - Berks (011) MD - Cecil - 015
Pittsburgh CSA	Full-scope	OH Jefferson - 081 PA Allegheny - 003 Armstrong - 005 Beaver - 007 Butler - 019 Fayette - 051 Washington - 125 Westmoreland - 129 Indiana - 063 Lawrence - 073 WV Brooke - 009
Washington DC CSA	Full-scope	DC District of Columbia - 001 MD Ann-Arundel - 003 Baltimore - 005 Harford - 025 Howard - 027 Queen Anne's - 035 Baltimore City - 510 Montgomery - 031 VA Fairfax - 059
Youngstown MMSA	Full-scope	OH Mahoning - 099 Trumbull - 155 PA

		Mercer - 085
NC		
Asheville MSA	Limited-scope	Buncombe - 021
Fayetteville CSA	Limited-scope	Cumberland - 051 Lee - 105 Moore - 125
Goldsboro MSA	Limited-scope	Wayne – 191 (2023)
Greensboro CSA	Full-scope	Alamance - 001 Guilford - 081 Rockingham - 157 Davidson - 057 Forsyth - 067 Stokes - 169 Yadkin - 197 Surry - 171
Greenville CSA	Limited-scope	Pitt - 147 Beaufort - 013 Lenoir - 107 (2023)
Jacksonville MSA	Limited-scope	Onslow - 133
Myrtle Beach MSA	Limited-scope	Brunswick - 019
NC Non-MSA	Limited-scope	Ashe - 009 Avery - 011 (2021-2022) Dare - 055 Hyde - 095 Martin - 117 Perquimans – 143 Tyrrell - 177 Watauga - 189 Wilkes - 193
New Bern MSA	Limited-scope	Craven – 049 (2023)
Raleigh CSA	Full-scope	Durham - 063 Granville - 077 (2023) Orange - 135 Person - 145 (2023) Franklin - 069 (2023) Johnston - 101 Wake - 183 Vance - 181 (2023)
Wilmington MSA	Limited-scope	New Hanover - 129 Pender - 141
OH		
Cleveland CSA	Full-scope	Cuyahoga - 035 Geauga - 055 Lake - 085 Lorain - 093 Medina - 103 Portage - 133 Summit – 153 (2021-2022)
PA		
Altoona CSA	Limited-scope	Blair - 013 Huntingdon - 061
East Stroudsburg MSA	Limited-scope	Monroe - 089
Erie CSA	Limited-scope	Erie - 049 Crawford - 039

Harrisburg CSA	Full-scope	Cumberland - 041 Dauphin - 043 Lebanon - 075 York - 133
Johnstown CSA	Limited-scope	Cambria - 021
Lancaster MSA	Limited-scope	Lancaster - 071
PA Non-MSA	Full-scope	Bedford - 009 Greene - 059 Juniata - 067 Mifflin - 087 Northumberland - 097 Schuylkill - 107 Snyder - 109 Susquehanna - 115 Union - 119 Venango - 121
Scranton MSA	Limited-scope	Lackawanna - 069 Luzerne - 079 Wyoming - 131
State College MSA	Limited-scope	Centre - 027
Williamsport CSA	Limited-scope	Lycoming - 081 Clinton - 035
SC		
Charleston MSA	Full-scope	Charleston - 019
Greenville CSA	Limited-scope	Greenville – 045 (2023) Cherokee – 021

Appendix B: Summary of MMSA and State Ratings

RATINGS FNBPA				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
FNBPA	Outstanding	Outstanding	High Satisfactory	Satisfactory
MMSA or State:				
Charlotte MMSA	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Philadelphia CSA	Outstanding	Outstanding	Low Satisfactory	Outstanding
Pittsburgh CSA	Outstanding	Outstanding	Outstanding	Outstanding
Washington DC CSA	High Satisfactory	Outstanding	Outstanding	Outstanding
Youngstown MMSA	Outstanding	Outstanding	High Satisfactory	Outstanding
State of North Carolina	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
State of Ohio	Outstanding	Outstanding	Needs to Improve	Satisfactory
State of Pennsylvania	Outstanding	Outstanding	High Satisfactory	Outstanding
State of South Carolina	Outstanding	High Satisfactory	Needs to Improve	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 set10:

- 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.
- Table U. Assessment Area Distribution of Consumer 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 households in those geographies.
- Table V. Assessment Area Distribution of Consumer 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 households by income level in each MMSA/assessment area.

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 MMSA	714	270,010,000	100.0	139,391	3.3	1.7	2.8	17.3	10.9	13.8	36.0	32.4	30.4	43.5	55.0	53.0	0.0	0.0	0.1
Total	714	270,010,000	100.0	139,391	3.3	1.7	2.8	17.3	10.9	13.8	36.0	32.4	30.4	43.5	55.0	53.0	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 O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2022-23**

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 MMSA	1,122	479,140,000	100.0	58,742	1.8	1.0	2.8	22.7	15.1	21.3	34.5	25.6	36.7	40.7	58.1	39.0	0.3	0.3	0.3
Total	1,122	479,140,000	100.0	58,742	1.8	1.0	2.8	22.7	15.1	21.3	34.5	25.6	36.7	40.7	58.1	39.0	0.3	0.3	0.3

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 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	
Charlotte MMSA	714	270,010,000	100.0	139,391	21.7	3.4	4.4	16.3	9.2	13.7	18.5	14.8	18.7	43.5	64.1	47.7	0.0	8.4	15.5	
Total	714	270,010,000	100.0	139,391	21.7	3.4	4.4	16.3	9.2	13.7	18.5	14.8	18.7	43.5	64.1	47.7	0.0	8.4	15.5	

*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																				2022-23
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	
Charlotte MMSA	1,122	479,140,000	100.0	58,742	20.3	3.7	5.5	17.4	6.8	15.4	19.2	16.0	21.1	43.1	63.2	42.1	0.0	10.3	15.9	
Total	1,122	479,140,000	100.0	58,742	20.3	3.7	5.5	17.4	6.8	15.4	19.2	16.0	21.1	43.1	63.2	42.1	0.0	10.3	15.9	

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 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 **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 MMSA	659	80,561	100.0	68,601	7.1	7.6	7.0	16.9	20.3	16.6	28.1	32.2	29.0	47.2	38.7	46.9	0.7	1.2	0.5
Total	659	80,561	100.0	68,601	7.1	7.6	7.0	16.9	20.3	16.6	28.1	32.2	29.0	47.2	38.7	46.9	0.7	1.2	0.5

*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 Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022-23**

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 MMSA	392	87,455	100.0	67,822	4.2	3.8	3.9	23.6	22.7	22.9	27.8	29.8	29.9	42.6	42.9	42.0	1.7	0.8	1.3
Total	392	87,455	100.0	67,822	4.2	3.8	3.9	23.6	22.7	22.9	27.8	29.8	29.9	42.6	42.9	42.0	1.7	0.8	1.3

*Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 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 **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 MMSA	659	80,561	100.0	68,601	88.7	65.7	47.2	3.4	31.1	7.9	3.2
Total	659	80,561	100.0	68,601	88.7	65.7	47.2	3.4	31.1	7.9	3.2

*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 R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2022-23**

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 MMSA	392	87,455	100.0	67,822	92.2	59.2	52.5	2.1	36.2	5.7	4.6
Total	392	87,455	100.0	67,822	92.2	59.2	52.5	2.1	36.2	5.7	4.6

*Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 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 MMSA	1	285	100.0	354	4.6	0.0	1.4	16.0	0.0	13.3	43.8	100.0	62.4	35.4	0.0	22.9	0.2	0.0	0.0
Total	1	285	100.0	354	4.6	0.0	1.4	16.0	0.0	13.3	43.8	100.0	62.4	35.4	0.0	22.9	0.2	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 S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2022-23**

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 MMSA	3	562	100.0	348	2.7	0.0	0.6	25.4	0.0	31.6	38.9	0.0	50.3	32.5	100.0	17.5	0.5	0.0	0.0
Total	3	562	100.0	348	2.7	0.0	0.6	25.4	0.0	31.6	38.9	0.0	50.3	32.5	100.0	17.5	0.5	0.0	0.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 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 MMSA	1	285	100.0	354	96.4	100.0	50.0	2.2	0.0	1.4	0.0
Total	1	285	100.0	354	96.4	100.0	50.0	2.2	0.0	1.4	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 **2022-23**

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 MMSA	3	562	100.0	348	97.4	100.0	51.4	1.4	0.0	1.3	0.0
Total	3	562	100.0	348	97.4	100.0	51.4	1.4	0.0	1.3	0.0

*Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA 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
Philadelphia CSA	269	51,945,000	100.0	24,999	6.2	10.4	4.2	3.9	6.3	3.6	64.0	51.3	64.5	25.9	32.0	27.6	0.0	0.0	0.0
Total	269	51,945,000	100.0	24,999	6.2	10.4	4.2	3.9	6.3	3.6	64.0	51.3	64.5	25.9	32.0	27.6	0.0	0.0	0.0

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 O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2022-23

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
Philadelphia CSA	442	76,610,000	100.0	11,722	3.2	5.2	4.4	9.6	14.0	13.6	62.1	51.8	57.6	25.1	29.0	24.5	0.0	0.0	0.0
Total	442	76,610,000	100.0	11,722	3.2	5.2	4.4	9.6	14.0	13.6	62.1	51.8	57.6	25.1	29.0	24.5	0.0	0.0	0.0

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 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
Philadelphia CSA	269	51,945,000	100.0	24,999	21.3	10.0	8.4	17.3	19.0	19.9	21.6	16.4	22.3	39.8	42.0	30.3	0.0	12.6	19.0
Total	269	51,945,000	100.0	24,999	21.3	10.0	8.4	17.3	19.0	19.9	21.6	16.4	22.3	39.8	42.0	30.3	0.0	12.6	19.0

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 **2022-23**

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
Philadelphia CSA	442	76,610,000	100.0	11,722	20.6	10.4	9.7	17.6	22.9	22.0	22.5	21.3	23.7	39.3	35.3	29.4	0.0	10.2	15.2
Total	442	76,610,000	100.0	11,722	20.6	10.4	9.7	17.6	22.9	22.0	22.5	21.3	23.7	39.3	35.3	29.4	0.0	10.2	15.2

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 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 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
Philadelphia CSA	246	22,343	100.0	10,806	11.1	13.4	8.9	5.0	6.9	4.7	58.9	55.7	59.8	25.0	24.0	26.6	0.0	0.0	0.0
Total	246	22,343	100.0	10,806	11.1	13.4	8.9	5.0	6.9	4.7	58.9	55.7	59.8	25.0	24.0	26.6	0.0	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 Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2022-23

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
Philadelphia CSA	141	22,299	100.0	9,945	9.2	7.8	6.6	14.7	15.6	13.6	52.2	53.9	53.6	23.9	22.7	26.1	0.0	0.0	0.0
Total	141	22,299	100.0	9,945	9.2	7.8	6.6	14.7	15.6	13.6	52.2	53.9	53.6	23.9	22.7	26.1	0.0	0.0	0.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 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 **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
Philadelphia CSA	246	22,343	100.0	10,806	87.7	82.9	49.6	4.0	15.9	8.3	1.2
Total	246	22,343	100.0	10,806	87.7	82.9	49.6	4.0	15.9	8.3	1.2

*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 R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2022-23**

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
Philadelphia CSA	141	22,299	100.0	9,945	89.6	70.2	54.9	3.2	26.2	7.2	3.5
Total	141	22,299	100.0	9,945	89.6	70.2	54.9	3.2	26.2	7.2	3.5

*Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 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
Philadelphia CSA	0	0	0.0	436	1.9	0.0	0.5	1.5	0.0	0.0	69.7	0.0	86.5	26.8	0.0	13.1	0.0	0.0	0.0
Total	0	0	0.0	436	1.9	0.0	0.5	1.5	0.0	0.0	69.7	0.0	86.5	26.8	0.0	13.1	0.0	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 S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2022-23**

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
Philadelphia CSA	0	0	0.0	413	1.7	0.0	0.0	5.9	0.0	5.8	69.0	0.0	77.0	23.4	0.0	17.2	0.0	0.0	0.0
Total	0	0	0.0	413	1.7	0.0	0.0	5.9	0.0	5.8	69.0	0.0	77.0	23.4	0.0	17.2	0.0	0.0	0.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 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
Philadelphia CSA	--	--	--	436	96.3	--	72.5	2.3	--	1.4	--
Total	--	--	--	436	96.3	--	72.5	2.3	--	1.4	--

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 2022-23

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
Philadelphia CSA	--	--	--	413	96.7	--	71.9	2.0	--	1.4	--
Total	--	--	--	413	96.7	--	71.9	2.0	--	1.4	--

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA 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
Pittsburgh CSA	4,015	736,505,000	100.0	118,102	2.6	1.2	1.3	16.5	10.7	12.0	53.6	47.5	48.9	27.3	40.5	37.8	0.0	0.0	0.0
Total	4,015	736,505,000	100.0	118,102	2.6	1.2	1.3	16.5	10.7	12.0	53.6	47.5	48.9	27.3	40.5	37.8	0.0	0.0	0.0

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 O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2022-23**

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
Pittsburgh CSA	5,342	902,840,000	100.0	56,295	2.5	1.5	2.2	18.5	13.6	16.1	49.0	43.7	46.3	29.8	41.0	35.1	0.2	0.2	0.2
Total	5,342	902,840,000	100.0	56,295	2.5	1.5	2.2	18.5	13.6	16.1	49.0	43.7	46.3	29.8	41.0	35.1	0.2	0.2	0.2

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 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
Pittsburgh CSA	4,015	736,505,000	100.0	118,102	21.0	6.0	8.6	17.4	14.7	17.9	20.7	19.6	21.2	40.8	49.4	37.1	0.0	10.3	15.2
Total	4,015	736,505,000	100.0	118,102	21.0	6.0	8.6	17.4	14.7	17.9	20.7	19.6	21.2	40.8	49.4	37.1	0.0	10.3	15.2

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																			2022-23
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
Pittsburgh CSA	5,342	902,840,000	100.0	56,295	20.2	8.5	11.8	18.1	16.8	21.6	21.3	20.3	20.8	40.4	39.1	30.1	0.0	15.3	15.7
Total	5,342	902,840,000	100.0	56,295	20.2	8.5	11.8	18.1	16.8	21.6	21.3	20.3	20.8	40.4	39.1	30.1	0.0	15.3	15.7

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 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 **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
Pittsburgh CSA	3,500	361,790	100.0	60,351	4.9	3.9	3.9	15.7	15.2	14.3	43.2	46.4	42.0	35.3	34.0	32.5	0.8	0.4	7.3
Total	3,500	361,790	100.0	60,351	4.9	3.9	3.9	15.7	15.2	14.3	43.2	46.4	42.0	35.3	34.0	32.5	0.8	0.4	7.3

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%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022-23**

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
Pittsburgh CSA	1,490	257,754	100.0	50,584	5.5	2.6	4.1	16.3	16.2	16.2	39.9	45.2	41.7	36.6	35.0	34.7	1.7	1.1	3.3
Total	1,490	257,754	100.0	50,584	5.5	2.6	4.1	16.3	16.2	16.2	39.9	45.2	41.7	36.6	35.0	34.7	1.7	1.1	3.3

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 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												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	
Pittsburgh CSA	3,500	361,790	100.0	60,351	85.9	68.2	48.4	4.4	26.3	9.7	5.5	
Total	3,500	361,790	100.0	60,351	85.9	68.2	48.4	4.4	26.3	9.7	5.5	
<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 R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2022-23
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	
Pittsburgh CSA	1,490	257,754	100.0	50,584	88.0	54.6	50.1	3.6	40.9	8.4	4.4	
Total	1,490	257,754	100.0	50,584	88.0	54.6	50.1	3.6	40.9	8.4	4.4	
<i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 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																				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	
Pittsburgh CSA	12	874	100.0	355	2.0	0.0	1.1	12.5	16.7	13.5	59.6	66.7	68.7	25.8	16.7	16.6	0.1	0.0	0.0	
Total	12	874	100.0	355	2.0	0.0	1.1	12.5	16.7	13.5	59.6	66.7	68.7	25.8	16.7	16.6	0.1	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 S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																				2022-23
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	
Pittsburgh CSA	9	728	100.0	349	2.2	0.0	0.0	15.2	11.1	14.0	54.9	66.7	65.9	27.3	22.2	20.1	0.4	0.0	0.0	
Total	9	728	100.0	349	2.2	0.0	0.0	15.2	11.1	14.0	54.9	66.7	65.9	27.3	22.2	20.1	0.4	0.0	0.0	

*Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 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
Pittsburgh CSA	12	874	100.0	355	97.4	83.3	54.6	1.6	16.7	1.1	0.0
Total	12	874	100.0	355	97.4	83.3	54.6	1.6	16.7	1.1	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 **2022-23**

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
Pittsburgh CSA	9	728	100.0	349	97.8	77.8	60.7	1.1	22.2	1.1	0.0
Total	9	728	100.0	349	97.8	77.8	60.7	1.1	22.2	1.1	0.0

*Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA 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
Washington DC CSA	2,137	892,705,000	100.0	362,279	5.0	1.9	4.3	15.2	8.2	13.3	34.7	31.2	35.1	44.9	58.6	47.0	0.2	0.2	0.3
Total	2,137	892,705,000	100.0	362,279	5.0	1.9	4.3	15.2	8.2	13.3	34.7	31.2	35.1	44.9	58.6	47.0	0.2	0.2	0.3

*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 O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2022-23**

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
Washington DC CSA	3,152	1,199,050,000	100.0	102,128	4.5	1.3	5.9	16.6	10.6	18.1	34.8	32.1	35.3	43.9	55.8	40.2	0.3	0.2	0.4
Total	3,152	1,199,050,000	100.0	102,128	4.5	1.3	5.9	16.6	10.6	18.1	34.8	32.1	35.3	43.9	55.8	40.2	0.3	0.2	0.4

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 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
Washington DC CSA	2,137	892,705,000	100.0	362,279	22.2	3.6	6.7	16.0	8.9	16.4	19.1	13.8	19.8	42.7	54.0	36.1	0.0	19.7	20.9
Total	2,137	892,705,000	100.0	362,279	22.2	3.6	6.7	16.0	8.9	16.4	19.1	13.8	19.8	42.7	54.0	36.1	0.0	19.7	20.9

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																			2022-23
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
Washington DC CSA	3,152	1,199,050,000	100.0	102,128	21.6	4.5	8.4	16.0	10.4	20.0	19.7	17.4	21.2	42.7	52.1	33.7	0.0	15.5	16.7
Total	3,152	1,199,050,000	100.0	102,128	21.6	4.5	8.4	16.0	10.4	20.0	19.7	17.4	21.2	42.7	52.1	33.7	0.0	15.5	16.7

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 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 **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
Washington DC CSA	1,624	173,888	100.0	174,383	5.6	4.2	5.2	16.2	16.7	15.5	34.5	37.7	35.5	42.9	40.9	43.4	0.8	0.5	0.5
Total	1,624	173,888	100.0	174,383	5.6	4.2	5.2	16.2	16.7	15.5	34.5	37.7	35.5	42.9	40.9	43.4	0.8	0.5	0.5

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 Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022-23**

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
Washington DC CSA	747	149,636	100.0	159,446	5.5	3.7	4.6	18.4	14.6	16.6	34.1	40.8	34.8	41.2	40.6	43.4	0.9	0.3	0.6
Total	747	149,636	100.0	159,446	5.5	3.7	4.6	18.4	14.6	16.6	34.1	40.8	34.8	41.2	40.6	43.4	0.9	0.3	0.6

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 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												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	
Washington DC CSA	1,624	173,888	100.0	174,383	88.4	69.2	46.9	4.1	25.9	7.5	5.0	
Total	1,624	173,888	100.0	174,383	88.4	69.2	46.9	4.1	25.9	7.5	5.0	
<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 R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2022-23
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	
Washington DC CSA	747	149,636	100.0	159,446	90.4	56.9	51.7	3.1	39.2	6.5	3.9	
Total	747	149,636	100.0	159,446	90.4	56.9	51.7	3.1	39.2	6.5	3.9	
<i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 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 **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
Washington DC CSA	1	55	100.0	414	3.3	0.0	1.4	14.0	0.0	6.0	35.6	100.0	40.8	46.9	0.0	51.7	0.2	0.0	0.0
Total	1	55	100.0	414	3.3	0.0	1.4	14.0	0.0	6.0	35.6	100.0	40.8	46.9	0.0	51.7	0.2	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 S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2022-23**

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
Washington DC CSA	2	140	100.0	459	3.4	0.0	1.7	15.8	100.0	15.5	35.6	0.0	29.6	44.8	0.0	53.2	0.5	0.0	0.0
Total	2	140	100.0	459	3.4	0.0	1.7	15.8	100.0	15.5	35.6	0.0	29.6	44.8	0.0	53.2	0.5	0.0	0.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 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
Washington DC CSA	1	55	100.0	414	95.3	100.0	57.7	2.8	0.0	2.0	0.0
Total	1	55	100.0	414	95.3	100.0	57.7	2.8	0.0	2.0	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 **2022-23**

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
Washington DC CSA	2	140	100.0	459	96.2	100.0	54.7	2.0	0.0	1.8	0.0
Total	2	140	100.0	459	96.2	100.0	54.7	2.0	0.0	1.8	0.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA 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	
Youngstown MMSA	868	109,270,000	100.0	20,593	5.1	0.8	1.1	12.5	5.5	7.6	53.0	57.8	55.0	29.3	35.8	36.3	0.0	0.0	0.0	
Total	868	109,270,000	100.0	20,593	5.1	0.8	1.1	12.5	5.5	7.6	53.0	57.8	55.0	29.3	35.8	36.3	0.0	0.0	0.0	

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 O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2022-23
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	
Youngstown MMSA	1,172	135,970,000	100.0	11,353	3.5	1.4	1.8	16.0	11.3	14.5	51.6	51.2	52.3	28.6	36.2	31.3	0.4	0.0	0.2	
Total	1,172	135,970,000	100.0	11,353	3.5	1.4	1.8	16.0	11.3	14.5	51.6	51.2	52.3	28.6	36.2	31.3	0.4	0.0	0.2	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 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
Youngstown MMSA	868	109,270,000	100.0	20,593	20.5	4.7	7.9	18.4	18.8	21.4	20.6	19.7	22.4	40.5	49.1	32.9	0.0	7.7	15.3
Total	868	109,270,000	100.0	20,593	20.5	4.7	7.9	18.4	18.8	21.4	20.6	19.7	22.4	40.5	49.1	32.9	0.0	7.7	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 P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2022-23**

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
Youngstown MMSA	1,172	135,970,000	100.0	11,353	22.1	9.2	10.5	16.8	16.8	24.0	21.1	21.8	23.7	40.0	43.3	28.8	0.0	9.0	12.9
Total	1,172	135,970,000	100.0	11,353	22.1	9.2	10.5	16.8	16.8	24.0	21.1	21.8	23.7	40.0	43.3	28.8	0.0	9.0	12.9

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 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 **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
Youngstown MMSA	701	67,143	100.0	10,091	7.9	8.0	7.5	12.6	11.4	11.1	44.8	49.9	43.3	34.7	30.7	38.2	0.0	0.0	0.0
Total	701	67,143	100.0	10,091	7.9	8.0	7.5	12.6	11.4	11.1	44.8	49.9	43.3	34.7	30.7	38.2	0.0	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 Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022-23**

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
Youngstown MMSA	317	51,211	100.0	9,097	6.2	4.4	4.6	16.5	9.5	13.3	42.8	51.1	46.4	34.2	34.7	35.2	0.4	0.3	0.5
Total	317	51,211	100.0	9,097	6.2	4.4	4.6	16.5	9.5	13.3	42.8	51.1	46.4	34.2	34.7	35.2	0.4	0.3	0.5

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 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												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	
Youngstown MMSA	701	67,143	100.0	10,091	81.6	73.9	49.4	5.7	23.5	12.7	2.6	
Total	701	67,143	100.0	10,091	81.6	73.9	49.4	5.7	23.5	12.7	2.6	
<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 R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2022-23
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	
Youngstown MMSA	317	51,211	100.0	9,097	88.6	63.1	53.6	3.3	33.4	8.1	3.5	
Total	317	51,211	100.0	9,097	88.6	63.1	53.6	3.3	33.4	8.1	3.5	
<i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 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 **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
Youngstown MMSA	4	359	100.0	178	2.2	0.0	1.7	6.6	0.0	0.0	58.3	75.0	64.0	32.9	25.0	34.3	0.0	0.0	0.0
Total	4	359	100.0	178	2.2	0.0	1.7	6.6	0.0	0.0	58.3	75.0	64.0	32.9	25.0	34.3	0.0	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 S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2022-23**

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
Youngstown MMSA	3	95	100.0	185	2.2	0.0	1.1	12.9	0.0	8.6	53.2	33.3	66.5	31.6	66.7	23.8	0.1	0.0	0.0
Total	3	95	100.0	185	2.2	0.0	1.1	12.9	0.0	8.6	53.2	33.3	66.5	31.6	66.7	23.8	0.1	0.0	0.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 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
Youngstown MMSA	4	359	100.0	178	97.8	75.0	54.5	1.3	25.0	0.9	0.0
Total	4	359	100.0	178	97.8	75.0	54.5	1.3	25.0	0.9	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 **2022-23**

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
Youngstown MMSA	3	95	100.0	185	98.4	100.0	59.5	0.8	0.0	0.8	0.0
Total	3	95	100.0	185	98.4	100.0	59.5	0.8	0.0	0.8	0.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA 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
Asheville MSA	27	12,305,000	0.8	15,931	0.7	0.0	0.8	9.7	7.4	9.7	66.1	48.1	64.0	23.5	44.4	25.4	0.0	0.0	0.0
Fayetteville CSA	149	35,945,000	4.4	28,324	0.5	0.0	0.1	9.4	7.4	7.0	54.8	18.8	50.6	35.3	73.8	42.3	0.0	0.0	0.0
Greensboro CSA	1,019	239,015,000	30.3	70,130	2.9	0.9	1.8	17.6	11.1	13.4	44.0	48.1	40.8	35.4	39.8	43.9	0.0	0.1	0.0
Greenville NC CSA	139	27,055,000	4.1	9,539	3.3	0.0	4.7	15.9	5.0	10.4	43.2	52.5	44.3	37.6	42.4	40.6	0.0	0.0	0.0
Jacksonville MSA	26	6,420,000	0.8	15,319	0.0	0.0	0.0	3.8	3.8	2.7	76.3	61.5	79.4	19.9	34.6	17.9	0.0	0.0	0.0
Myrtle Beach MSA	384	147,200,000	11.4	15,598	0.0	0.0	0.0	19.0	10.7	12.1	52.9	43.2	50.7	28.1	46.1	37.1	0.0	0.0	0.0
NC non-MSA	441	96,685,000	13.1	14,487	0.0	0.0	0.0	8.5	4.8	3.4	58.8	43.3	36.1	32.6	51.9	60.5	0.0	0.0	0.0
Raleigh CSA	884	323,350,000	26.3	136,238	2.3	0.8	2.3	22.2	12.6	19.3	35.1	30.4	35.9	40.4	56.2	42.6	0.0	0.0	0.0
Wilmington MSA	289	87,845,000	8.6	22,969	4.9	2.1	4.4	14.4	6.6	7.8	44.4	40.5	47.1	36.3	50.9	40.7	0.0	0.0	0.0
Total	3,358	975,820,000	100.0	328,535	2.2	0.7	1.8	16.7	9.7	13.6	45.5	40.6	43.4	35.6	49.0	41.2	0.0	0.0	0.0

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 O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2022**

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
Greensville NC CSA	84	14,440,000	6.3	6,212	1.0	0.0	1.0	10.1	4.8	9.7	50.6	47.6	50.4	36.5	47.6	37.5	1.7	0.0	1.4
NC non-MSA	360	76,570,000	27.0	9,047	0.0	0.0	0.0	6.3	4.4	3.6	64.7	61.1	49.9	28.1	33.1	45.5	0.8	1.4	1.1
Raleigh CSA	889	369,655,000	66.7	77,684	4.4	1.9	4.3	17.1	8.9	18.0	37.1	32.2	39.8	40.5	55.9	36.8	1.0	1.1	1.0
Total	1,333	460,665,000	100.0	92,943	3.5	1.3	3.7	14.9	7.4	16.0	42.1	41.0	41.5	38.4	49.2	37.7	1.0	1.1	1.0

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 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 **2022-23**

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	85	34,375,000	2.8	5,831	1.4	1.2	1.9	15.3	9.4	16.9	49.8	49.4	50.6	33.5	40.0	30.6	0.0	0.0	0.0
Fayetteville CSA	237	67,485,000	7.7	14,581	0.6	0.0	0.3	12.3	3.8	13.9	41.5	22.4	39.7	44.7	70.9	45.2	0.9	3.0	0.9
Greensboro CSA	1,687	448,885,000	55.0	36,052	3.4	1.8	3.9	15.2	9.6	15.8	46.7	51.2	45.7	34.5	37.3	34.5	0.2	0.1	0.2
Jacksonville MSA	45	15,055,000	1.5	7,234	0.0	0.0	0.0	11.3	6.7	11.7	53.3	26.7	50.8	35.4	66.7	37.4	0.0	0.0	0.0
Myrtle Beach MSA	573	234,875,000	18.7	8,122	1.5	0.7	1.0	4.8	8.4	4.2	53.0	35.3	49.9	40.7	55.7	44.9	0.0	0.0	0.0
Wilmington MSA	440	156,050,000	14.3	9,426	1.8	0.0	1.2	24.3	19.1	21.4	38.4	36.4	44.2	34.9	43.2	32.7	0.7	1.4	0.5
Total	3,067	956,725,000	100.0	81,246	2.3	1.2	2.2	14.8	10.2	14.6	46.1	43.4	45.7	36.5	44.7	37.2	0.3	0.5	0.3

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 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 **2023**

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
Goldsboro MSA	5	525,000	0.4	2,597	3.1	0.0	4.9	17.0	0.0	13.4	52.3	40.0	49.8	26.8	60.0	31.2	0.9	0.0	0.8
Greenville NC CSA	91	14,355,000	8.0	5,800	1.5	1.1	3.0	9.6	1.1	8.1	56.7	60.4	56.4	30.8	35.2	31.2	1.3	2.2	1.3
NC non-MSA	219	44,085,000	19.2	5,430	0.0	0.0	0.0	6.8	6.8	4.3	63.4	62.1	51.8	28.9	29.7	42.8	0.9	1.4	1.1
New Bern MSA	59	8,895,000	5.2	2,953	0.0	0.0	0.0	18.2	27.1	12.7	42.8	39.0	43.0	37.5	33.9	43.1	1.5	0.0	1.3
Raleigh CSA	767	283,485,000	67.2	59,217	4.2	2.3	5.6	20.7	13.6	21.4	37.7	36.0	40.7	36.5	47.6	31.2	0.9	0.5	1.1
Total	1,141	351,345,000	100.0	75,997	3.3	1.7	4.8	17.9	11.9	18.5	43.1	43.1	43.1	34.8	42.5	32.5	0.9	0.8	1.1

Source: 2020 U.S. Census; 01/01/2023 - 12/31/2023 Bank Data, 2023 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
Asheville MSA	27	12,305,000	0.8	15,931	19.6	0.0	5.2	18.7	0.0	15.7	19.8	11.1	20.8	41.9	59.3	45.0	0.0	29.6	13.2
Fayetteville CSA	149	35,945,000	4.4	28,324	19.5	0.7	2.0	16.5	6.7	8.6	19.1	19.5	15.5	44.9	66.4	38.5	0.0	6.7	35.4
Greensboro CSA	1,019	239,015,000	30.3	70,130	22.0	4.0	5.4	17.8	11.7	16.9	18.3	21.1	20.8	41.8	58.4	41.8	0.0	4.8	15.1
Greenville NC CSA	139	27,055,000	4.1	9,539	22.6	1.4	2.5	16.3	7.2	11.0	18.2	14.4	19.1	42.9	71.2	49.6	0.0	5.8	17.9
Jacksonville MSA	26	6,420,000	0.8	15,319	18.2	0.0	2.0	18.6	7.7	9.9	23.9	15.4	19.4	39.3	65.4	30.4	0.0	11.5	38.4
Myrtle Beach MSA	384	147,200,000	11.4	15,598	18.6	2.9	2.8	17.3	7.3	11.4	20.3	12.8	16.9	43.7	72.7	52.9	0.0	4.4	15.9
NC non-MSA	441	96,685,000	13.1	14,487	20.1	1.1	1.5	17.2	8.2	7.4	19.5	13.8	13.0	43.3	66.2	65.3	0.0	10.7	12.8
Raleigh CSA	884	323,350,000	26.3	136,238	21.8	1.4	5.8	16.8	10.0	16.2	18.6	12.7	20.4	42.8	65.4	42.8	0.0	10.6	14.7
Wilmington MSA	289	87,845,000	8.6	22,969	22.7	2.1	4.0	17.6	6.9	14.0	18.4	12.5	18.0	41.3	68.9	46.4	0.0	9.7	17.7
Total	3,358	975,820,000	100.0	328,535	21.3	2.3	4.6	17.3	9.3	14.5	18.9	15.8	19.3	42.5	64.7	43.7	0.0	7.9	17.9

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 **2022**

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
Greensville NC CSA	84	14,440,000	6.3	6,212	21.7	3.6	4.6	17.0	8.3	15.1	19.2	17.9	21.2	42.1	61.9	44.8	0.0	8.3	14.4
NC non-MSA	360	76,570,000	27.0	9,047	18.9	4.4	3.3	17.2	10.8	10.0	20.5	18.3	15.7	43.4	60.6	60.5	0.0	5.8	10.5
Raleigh CSA	889	369,655,000	66.7	77,684	21.4	2.6	7.5	16.3	7.5	17.8	20.2	16.9	23.3	42.1	67.9	40.7	0.0	5.1	10.8
Total	1,333	460,665,000	100.0	92,943	21.2	3.2	6.9	16.5	8.5	16.8	20.1	17.3	22.4	42.2	65.6	42.9	0.0	5.5	11.0

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 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 **2022-23**

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	85	34,375,000	2.8	5,831	19.2	0.0	4.9	18.3	4.7	13.9	20.6	7.1	20.4	41.9	68.2	49.0	0.0	20.0	11.8
Fayetteville CSA	237	67,485,000	7.7	14,581	20.4	2.5	3.0	16.9	11.0	11.5	19.3	8.9	21.5	43.3	68.4	40.9	0.0	9.3	23.0
Greensboro CSA	1,687	448,885,000	55.0	36,052	21.9	6.2	7.0	17.2	14.2	20.3	19.2	18.2	23.3	41.6	54.8	36.7	0.0	6.7	12.8
Jacksonville MSA	45	15,055,000	1.5	7,234	18.3	0.0	1.9	18.7	4.4	11.5	22.1	8.9	24.5	40.9	68.9	39.7	0.0	17.8	22.4
Myrtle Beach MSA	573	234,875,000	18.7	8,122	15.8	1.9	2.9	16.6	6.5	11.6	22.2	12.9	18.2	45.4	73.3	50.2	0.0	5.4	17.2
Wilmington MSA	440	156,050,000	14.3	9,426	22.2	2.0	4.8	17.4	8.2	15.1	19.6	11.8	19.4	40.8	66.6	44.8	0.0	11.4	16.0
Total	3,067	956,725,000	100.0	81,246	20.9	4.2	5.0	17.4	11.2	16.0	19.8	15.1	21.9	42.0	61.6	40.9	0.0	7.9	16.2

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 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 **2023**

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
Goldsboro MSA	5	525,000	0.4	2,597	23.3	0.0	4.4	17.1	20.0	17.5	19.7	0.0	24.9	39.9	40.0	32.6	0.0	40.0	20.7
Greenville NC CSA	91	14,355,000	8.0	5,800	21.8	5.5	4.6	17.5	13.2	16.3	19.5	13.2	21.6	41.2	49.5	40.2	0.0	18.7	17.2
NC non-MSA	219	44,085,000	19.2	5,430	18.8	3.7	3.2	16.9	10.0	10.1	20.5	19.2	16.5	43.9	54.3	57.7	0.0	12.8	12.4
New Bern MSA	59	8,895,000	5.2	2,953	20.5	3.4	3.9	17.4	13.6	16.2	20.4	18.6	23.8	41.8	55.9	39.7	0.0	8.5	16.4
Raleigh CSA	767	283,485,000	67.2	59,217	22.4	2.5	6.9	16.8	9.5	18.7	20.5	17.2	23.5	40.3	60.0	36.7	0.0	10.8	14.2
Total	1,141	351,345,000	100.0	75,997	22.0	3.0	6.3	16.9	10.2	17.8	20.3	17.3	22.9	40.8	57.8	38.4	0.0	11.8	14.6

Source: 2020 U.S. Census; 01/01/2023 - 12/31/2023 Bank Data, 2023 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 **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
Asheville MSA	21	5,116	0.9	9,207	3.3	9.5	3.3	12.6	23.8	14.6	51.2	19.0	51.4	32.9	47.6	30.8	0.0	0.0	0.0
Fayetteville CSA	81	8,596	3.3	10,081	1.5	0.0	1.4	15.7	11.1	14.2	50.0	42.0	48.2	32.7	46.9	36.2	0.1	0.0	0.0
Greensboro CSA	856	69,304	34.7	36,493	4.8	5.0	4.5	20.0	20.1	20.4	36.8	45.1	38.3	38.1	29.6	36.6	0.3	0.2	0.3
Greenville NC CSA	91	7,214	3.7	4,745	12.6	5.5	10.1	17.1	14.3	17.0	39.9	51.6	41.5	30.3	28.6	31.4	0.0	0.0	0.0
Jacksonville MSA	56	4,696	2.3	3,010	0.0	0.0	0.0	11.1	12.5	8.6	68.7	83.9	71.7	19.5	3.6	19.6	0.7	0.0	0.1
Myrtle Beach MSA	56	3,552	2.3	3,868	0.0	0.0	0.0	19.2	32.1	18.9	47.0	35.7	49.8	33.8	32.1	31.2	0.0	0.0	0.0
NC non-MSA	524	33,405	21.2	6,796	0.0	0.0	0.0	7.1	6.5	5.8	46.5	50.6	43.5	46.4	42.9	50.7	0.0	0.0	0.0
Raleigh CSA	595	66,914	24.1	56,594	4.6	4.5	4.2	21.6	17.6	21.6	32.6	39.5	34.0	40.7	38.3	39.9	0.5	0.0	0.3
Wilmington MSA	188	19,604	7.6	11,214	12.2	23.9	11.4	11.1	18.6	11.3	34.9	21.8	38.6	41.6	34.6	38.5	0.3	1.1	0.2
Total	2,468	218,401	100.0	142,008	4.7	4.9	4.4	18.3	16.1	18.2	38.5	43.7	39.5	38.2	35.0	37.6	0.3	0.2	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 Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022**

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
Greensville NC CSA	33	4,192	9.5	4,579	3.2	0.0	1.8	16.1	9.1	13.0	45.5	48.5	49.3	31.3	24.2	32.1	3.9	18.2	3.8
NC non-MSA	119	14,019	34.3	6,083	0.0	0.0	0.0	6.3	5.0	5.1	47.0	61.3	48.8	41.7	29.4	42.3	5.0	4.2	3.9
Raleigh CSA	195	34,560	56.2	54,252	6.4	8.2	6.0	16.8	14.4	17.6	35.2	41.5	35.7	40.2	35.9	39.2	1.4	0.0	1.5
Total	347	52,771	100.0	64,914	5.7	4.6	5.2	15.9	10.7	16.1	36.9	49.0	37.9	39.6	32.6	39.0	1.9	3.2	1.9

*Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 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 **2022-23**

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	17	5,504	2.2	8,932	1.1	0.0	1.3	19.0	5.9	21.1	50.5	70.6	49.0	29.4	23.5	28.6	0.0	0.0	0.0
Fayetteville CSA	45	8,760	5.7	9,743	1.8	0.0	2.0	17.7	17.8	14.7	40.4	42.2	37.7	39.7	40.0	45.3	0.4	0.0	0.4
Greensboro CSA	479	67,855	61.1	33,660	7.2	3.8	6.8	17.3	14.4	17.2	38.8	46.6	41.5	36.4	35.3	34.3	0.3	0.0	0.2
Jacksonville MSA	28	3,607	3.6	3,383	0.1	0.0	0.1	19.9	14.3	15.4	47.0	42.9	44.6	32.4	42.9	39.9	0.6	0.0	0.1
Myrtle Beach MSA	42	5,012	5.4	4,114	2.2	2.4	2.0	3.4	2.4	3.7	52.3	47.6	56.0	42.1	47.6	38.3	0.0	0.0	0.0
Wilmington MSA	173	24,308	22.1	10,962	3.5	2.3	3.6	26.1	37.0	29.9	30.1	31.2	31.8	39.4	28.9	34.2	0.9	0.6	0.5
Total	784	115,046	100.0	70,794	4.6	2.9	4.3	18.3	18.8	18.4	40.3	43.4	41.4	36.5	34.8	35.6	0.4	0.1	0.2

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 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 **2023**

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
Goldsboro MSA	6	376	1.0	1,769	9.1	0.0	7.7	22.0	0.0	23.1	47.2	33.3	45.3	20.3	66.7	23.1	1.3	0.0	0.8
Greenville NC CSA	46	5,963	7.7	5,563	3.7	2.2	2.1	16.1	6.5	12.7	49.3	54.3	53.8	27.8	32.6	28.3	3.2	4.3	3.1
NC non-MSA	89	11,302	15.0	5,593	0.0	0.0	0.0	6.7	10.1	5.5	45.6	64.0	46.6	42.5	22.5	43.7	5.2	3.4	4.2
New Bern MSA	14	1,453	2.4	1,823	0.0	0.0	0.0	13.4	28.6	17.2	50.2	42.9	48.5	33.7	28.6	33.0	2.7	0.0	1.3
Raleigh CSA	244	40,498	41.1	58,152	6.3	7.4	5.9	19.1	32.4	19.3	35.6	35.2	36.4	37.6	24.6	37.0	1.3	0.4	1.4
Total	594	101,389	100.0	138,155	6.7	6.2	5.5	17.1	20.4	16.5	33.7	38.9	36.2	40.8	33.2	40.3	1.7	1.3	1.5

Source: 2023 D&B Data; 01/01/2023 - 12/31/2023 Bank Data; 2022 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 **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
Asheville MSA	21	5,116	0.9	9,207	90.1	47.6	48.0	3.0	38.1	6.9	14.3
Fayetteville CSA	81	8,596	3.3	10,081	87.7	76.5	49.9	3.1	21.0	9.2	2.5
Greensboro CSA	856	69,304	34.7	36,493	87.0	69.0	49.0	4.0	23.4	9.0	7.6
Greenville NC CSA	91	7,214	3.7	4,745	86.5	75.8	49.8	3.5	15.4	10.0	8.8
Jacksonville MSA	56	4,696	2.3	3,010	87.6	85.7	52.0	2.5	12.5	9.9	1.8
Myrtle Beach MSA	56	3,552	2.3	3,868	91.1	82.1	51.6	2.3	16.1	6.6	1.8
NC non-MSA	524	33,405	21.2	6,796	85.9	82.3	55.6	3.7	12.8	10.3	5.0
Raleigh CSA	595	66,914	24.1	56,594	89.2	67.7	46.8	3.1	29.4	7.7	2.9
Wilmington MSA	188	19,604	7.6	11,214	88.7	61.7	47.1	3.3	35.1	8.0	3.2
Total	2,468	218,401	100.0	142,008	88.3	72.0	48.5	3.3	22.8	8.3	5.2

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 R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2022**

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
Greensville NC CSA	33	4,192	9.5	4,579	89.3	54.5	55.5	2.6	42.4	8.1	3.0
NC non-MSA	119	14,019	34.3	6,083	88.6	67.2	58.0	2.8	30.3	8.6	2.5
Raleigh CSA	195	34,560	56.2	54,252	91.7	59.5	51.9	2.2	38.5	6.0	2.1
Total	347	52,771	100.0	64,914	91.3	61.7	52.7	2.3	36.0	6.4	2.3

*Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 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 **2022-23**

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	17	5,504	2.2	8,932	92.2	52.9	52.6	2.1	47.1	5.7	0.0
Fayetteville CSA	45	8,760	5.7	9,743	91.3	71.1	53.5	2.0	26.7	6.7	2.2
Greensboro CSA	479	67,855	61.1	33,660	90.5	60.5	53.4	2.6	37.0	6.9	2.5
Jacksonville MSA	28	3,607	3.6	3,383	91.1	85.7	59.5	1.6	10.7	7.3	3.6
Myrtle Beach MSA	42	5,012	5.4	4,114	93.2	69.0	53.8	1.6	31.0	5.3	0.0
Wilmington MSA	173	24,308	22.1	10,962	91.7	53.2	54.0	2.2	45.1	6.1	1.7
Total	784	115,046	100.0	70,794	91.1	60.7	53.8	2.3	37.1	6.6	2.2

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 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 **2023**

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
Goldsboro MSA	6	376	1.5	1,769	88.9	100.0	57.0	2.6	0.0	8.5	0.0
Greenville NC CSA	46	5,963	11.5	5,563	89.6	60.9	55.9	2.5	37.0	7.9	2.2
NC non-MSA	89	11,302	22.3	5,593	89.3	69.7	57.9	2.5	28.1	8.2	2.2
New Bern MSA	14	1,453	3.5	1,823	89.2	92.9	61.8	2.4	7.1	8.4	0.0
Raleigh CSA	244	40,498	61.2	58,152	92.2	63.1	52.0	2.0	34.4	5.8	2.5
Total	399	59,592	100.0	72,900	91.6	65.9	53.1	2.1	31.8	6.3	2.3

Source: 2023 D&B Data; 01/01/2023 - 12/31/2023 Bank Data; 2022 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
Asheville MSA	0	0	0.0	46	0.9	0.0	0.0	11.5	0.0	6.5	66.4	0.0	78.3	21.2	0.0	15.2	0.0	0.0	0.0
Fayetteville CSA	1	19	4.5	172	0.3	0.0	0.0	7.7	0.0	4.7	55.0	100.0	68.0	37.0	0.0	27.3	0.1	0.0	0.0
Greensboro CSA	6	921	27.3	482	2.1	0.0	0.6	15.8	16.7	18.5	47.5	83.3	64.1	34.5	0.0	16.8	0.1	0.0	0.0
Greenville NC CSA	1	100	4.5	216	3.2	0.0	0.9	11.9	0.0	8.3	52.8	100.0	65.7	32.0	0.0	25.0	0.0	0.0	0.0
Jacksonville MSA	0	0	0.0	48	0.0	0.0	0.0	6.2	0.0	0.0	76.8	0.0	100.0	16.9	0.0	0.0	0.0	0.0	0.0
Myrtle Beach MSA	0	0	0.0	27	0.0	0.0	0.0	30.7	0.0	14.8	48.5	0.0	81.5	20.8	0.0	3.7	0.0	0.0	0.0
NC non-MSA	12	928	54.5	416	0.0	0.0	0.0	10.3	0.0	15.4	59.3	91.7	66.6	30.4	8.3	18.0	0.0	0.0	0.0
Raleigh CSA	2	89	9.1	353	3.1	0.0	3.4	23.4	50.0	36.0	41.5	0.0	38.0	32.0	50.0	22.7	0.1	0.0	0.0
Wilmington MSA	0	0	0.0	105	8.3	0.0	12.4	22.9	0.0	45.7	38.5	0.0	21.9	30.2	0.0	20.0	0.1	0.0	0.0
Total	22	2,057	100.0	1,865	2.3	0.0	1.6	17.1	9.1	19.4	49.1	81.8	59.4	31.4	9.1	19.6	0.1	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 S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2022**

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
Greensville NC CSA	0	0	0.0	163	0.8	0.0	0.0	9.8	0.0	6.7	47.6	0.0	33.7	40.3	0.0	58.9	1.5	0.0	0.6
NC non-MSA	11	1,555	100.0	347	0.0	0.0	0.0	5.8	9.1	7.5	67.5	63.6	76.7	24.9	27.3	15.9	1.8	0.0	0.0
Raleigh CSA	0	0	0.0	353	7.5	0.0	6.2	18.1	0.0	38.2	40.0	0.0	28.9	33.1	0.0	24.4	1.4	0.0	2.3
Total	11	1,555	100.0	863	5.5	0.0	2.5	15.1	9.1	19.9	45.5	63.6	49.0	32.4	27.3	27.5	1.5	0.0	1.0

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 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 **2022-23**

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 MSA	0	0	0.0	61	1.2	0.0	0.0	18.1	0.0	16.4	52.2	0.0	54.1	28.4	0.0	29.5	0.0	0.0	0.0
Fayetteville CSA	0	0	0.0	155	0.8	0.0	0.0	10.5	0.0	11.0	40.9	0.0	43.2	47.3	0.0	45.8	0.5	0.0	0.0
Greensboro CSA	2	510	100.0	410	3.7	0.0	0.0	13.5	50.0	11.0	50.0	50.0	66.8	32.6	0.0	22.2	0.2	0.0	0.0
Jacksonville MSA	0	0	0.0	44	0.0	0.0	0.0	13.2	0.0	9.1	51.1	0.0	52.3	35.8	0.0	38.6	0.0	0.0	0.0
Myrtle Beach MSA	0	0	0.0	29	1.6	0.0	0.0	4.2	0.0	3.4	63.1	0.0	75.9	31.1	0.0	20.7	0.0	0.0	0.0
Wilmington MSA	0	0	0.0	85	1.8	0.0	1.2	36.6	0.0	51.8	32.1	0.0	30.6	28.6	0.0	16.5	0.8	0.0	0.0
Total	2	510	100.0	784	2.4	0.0	0.1	15.8	50.0	15.4	47.5	50.0	56.8	34.1	0.0	27.7	0.3	0.0	0.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 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 **2023**

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
Goldsboro MSA	0	0	0.0	123	2.7	0.0	1.6	18.6	0.0	27.6	55.4	0.0	56.1	22.8	0.0	14.6	0.5	0.0	0.0
Greenville NC CSA	0	0	0.0	244	1.2	0.0	0.4	8.0	0.0	4.5	59.2	0.0	54.9	30.4	0.0	39.8	1.2	0.0	0.4
NC non-MSA	2	53	66.7	322	0.0	0.0	0.0	6.3	0.0	8.1	64.7	50.0	75.8	27.0	50.0	16.1	2.0	0.0	0.0
New Bern MSA	0	0	0.0	34	0.0	0.0	0.0	27.8	0.0	50.0	39.7	0.0	32.4	31.3	0.0	17.6	1.2	0.0	0.0
Raleigh CSA	1	10	33.3	503	6.8	0.0	6.2	23.3	0.0	41.6	40.0	100.0	33.0	28.8	0.0	17.7	1.2	0.0	1.6
Total	3	63	100.0	1,226	4.9	0.0	2.8	19.5	0.0	24.2	45.9	66.7	50.9	28.5	33.3	21.4	1.2	0.0	0.7

Source: 2023 D&B Data; 01/01/2023 - 12/31/2023 Bank Data; 2022 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
Asheville MSA	--	--	--	46	98.2	--	60.9	0.9	--	0.9	--
Fayetteville CSA	1	19	4.5	172	96.9	100.0	66.9	1.3	0.0	1.8	0.0
Greensboro CSA	6	921	27.3	482	97.7	100.0	56.2	1.3	0.0	1.0	0.0
Greenville NC CSA	1	100	4.5	216	95.8	0.0	31.9	2.8	0.0	1.4	100.0
Jacksonville MSA	--	--	--	48	96.7	--	43.8	1.8	--	1.6	--
Myrtle Beach MSA	--	--	--	27	97.2	--	29.6	2.0	--	0.8	--
NC non-MSA	12	928	54.5	416	97.0	83.3	39.4	1.3	16.7	1.7	0.0
Raleigh CSA	2	89	9.1	353	96.1	100.0	54.1	2.2	0.0	1.7	0.0
Wilmington MSA	--	--	--	105	95.8	--	47.6	2.4	--	1.8	--
Total	22	2,057	100.0	1,865	96.8	86.4	49.2	1.7	9.1	1.4	4.5

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 **2022**

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
Greensville NC CSA	--	--	--	163	96.6	--	38.7	2.1	--	1.3	--
NC non-MSA	11	1,555	100.0	347	97.3	81.8	52.5	1.2	18.2	1.4	0.0
Raleigh CSA	--	--	--	353	96.7	--	54.4	1.7	--	1.6	--
Total	11	1,555	100.0	863	96.8	81.8	50.6	1.6	18.2	1.6	0.0

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 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 **2022-23**

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	--	--	--	61	98.3	--	59.0	0.7	--	0.9	--
Fayetteville CSA	--	--	--	155	97.8	--	60.6	0.7	--	1.5	--
Greensboro CSA	2	510	100.0	410	98.2	50.0	52.2	0.9	50.0	1.0	0.0
Jacksonville MSA	--	--	--	44	97.7	--	59.1	1.4	--	0.9	--
Myrtle Beach MSA	--	--	--	29	97.8	--	34.5	1.3	--	0.9	--
Wilmington MSA	--	--	--	85	97.2	--	44.7	1.3	--	1.5	--
Total	2	510	100.0	784	98.0	50.0	53.3	0.9	50.0	1.1	0.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 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 **2023**

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
Goldsboro MSA	--	--	--	123	97.3	--	37.4	2.2	--	0.5	--
Greenville NC CSA	--	--	--	244	97.1	--	43.0	1.7	--	1.2	--
NC non-MSA	2	53	66.7	322	97.5	100.0	50.9	1.1	0.0	1.4	0.0
New Bern MSA	--	--	--	34	97.4	--	47.1	0.9	--	1.6	--
Raleigh CSA	1	10	33.3	503	97.3	100.0	52.5	1.3	0.0	1.4	0.0
Total	3	63	100.0	1,226	97.3	100.0	48.5	1.4	0.0	1.3	0.0

Source: 2023 D&B Data; 01/01/2023 - 12/31/2023 Bank Data; 2022 CRA 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
Cleveland CSA	1,753	464,385,000	100.0	139,786	6.3	1.6	3.5	16.6	4.3	13.5	39.6	26.0	39.4	37.3	68.1	43.6	0.1	0.0	0.0
Total	1,753	464,385,000	100.0	139,786	6.3	1.6	3.5	16.6	4.3	13.5	39.6	26.0	39.4	37.3	68.1	43.6	0.1	0.0	0.0

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 O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2022**

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
Cleveland CSA	1,281	277,365,000	100.0	90,127	5.5	2.0	4.5	15.6	5.4	14.8	40.7	31.1	41.0	37.5	61.4	39.2	0.7	0.1	0.4
Total	1,281	277,365,000	100.0	90,127	5.5	2.0	4.5	15.6	5.4	14.8	40.7	31.1	41.0	37.5	61.4	39.2	0.7	0.1	0.4

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 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 **2023**

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
Cleveland CSA	897	204,715,000	100.0	51,164	5.3	1.7	4.8	15.0	8.0	15.5	41.6	33.0	42.4	37.3	56.9	36.8	0.8	0.4	0.6
Total	897	204,715,000	100.0	51,164	5.3	1.7	4.8	15.0	8.0	15.5	41.6	33.0	42.4	37.3	56.9	36.8	0.8	0.4	0.6

*Source: 2020 U.S. Census; 01/01/2023 - 12/31/2023 Bank Data, 2023 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	
Cleveland CSA	1,753	464,385,000	100.0	139,786	22.4	2.7	9.5	16.7	10.4	19.5	19.7	18.1	21.5	41.1	54.9	35.1	0.0	13.9	14.4	
Total	1,753	464,385,000	100.0	139,786	22.4	2.7	9.5	16.7	10.4	19.5	19.7	18.1	21.5	41.1	54.9	35.1	0.0	13.9	14.4	

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																				2022
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	
Cleveland CSA	1,281	277,365,000	100.0	90,127	21.9	2.7	9.7	17.3	9.9	21.2	19.9	15.5	21.3	40.9	55.1	33.7	0.0	16.7	14.0	
Total	1,281	277,365,000	100.0	90,127	21.9	2.7	9.7	17.3	9.9	21.2	19.9	15.5	21.3	40.9	55.1	33.7	0.0	16.7	14.0	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 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 **2023**

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
Cleveland CSA	897	204,715,000	100.0	51,164	22.0	4.2	10.4	17.3	12.7	22.5	19.6	14.6	20.6	41.1	44.8	31.4	0.0	23.6	15.1
Total	897	204,715,000	100.0	51,164	22.0	4.2	10.4	17.3	12.7	22.5	19.6	14.6	20.6	41.1	44.8	31.4	0.0	23.6	15.1

Source: 2020 U.S. Census; 01/01/2023 - 12/31/2023 Bank Data, 2023 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 **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
Cleveland CSA	938	102,622	100.0	67,965	9.1	8.4	8.5	16.4	17.6	16.2	33.6	28.6	32.9	40.2	44.9	41.7	0.7	0.5	0.6
Total	938	102,622	100.0	67,965	9.1	8.4	8.5	16.4	17.6	16.2	33.6	28.6	32.9	40.2	44.9	41.7	0.7	0.5	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 Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022**

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
Cleveland CSA	273	46,354	100.0	61,393	11.6	5.9	7.1	15.4	16.9	14.6	28.6	24.9	32.6	42.1	52.0	44.4	2.3	0.4	1.3
Total	273	46,354	100.0	61,393	11.6	5.9	7.1	15.4	16.9	14.6	28.6	24.9	32.6	42.1	52.0	44.4	2.3	0.4	1.3

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 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 **2023**

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
Cleveland CSA	183	37,549	100.0	49,579	8.9	9.8	6.9	16.2	14.2	14.7	29.6	28.4	32.9	43.6	46.4	44.2	1.7	1.1	1.2
Total	183	37,549	100.0	49,579	8.9	9.8	6.9	16.2	14.2	14.7	29.6	28.4	32.9	43.6	46.4	44.2	1.7	1.1	1.2

*Source: 2023 D&B Data; 01/01/2023 - 12/31/2023 Bank Data; 2022 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 **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
Cleveland CSA	938	102,622	100.0	67,965	83.6	76.8	49.1	6.0	21.2	10.4	2.0
Total	938	102,622	100.0	67,965	83.6	76.8	49.1	6.0	21.2	10.4	2.0

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 R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2022**

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
Cleveland CSA	273	46,354	100.0	61,393	91.0	78.4	50.4	3.2	18.7	5.8	2.9
Total	273	46,354	100.0	61,393	91.0	78.4	50.4	3.2	18.7	5.8	2.9

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 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 **2023**

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
Cleveland CSA	183	37,549	100.0	49,579	91.7	71.0	50.5	2.8	26.2	5.6	2.7
Total	183	37,549	100.0	49,579	91.7	71.0	50.5	2.8	26.2	5.6	2.7

*Source: 2023 D&B Data; 01/01/2023 - 12/31/2023 Bank Data; 2022 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
Cleveland CSA	0	0	0.0	439	4.2	0.0	1.1	11.8	0.0	6.8	43.0	0.0	51.9	40.9	0.0	40.1	0.1	0.0	0.0
Total	0	0	0.0	439	4.2	0.0	1.1	11.8	0.0	6.8	43.0	0.0	51.9	40.9	0.0	40.1	0.1	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 S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2022**

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
Cleveland CSA	0	0	0.0	405	9.4	0.0	2.0	13.3	0.0	5.7	37.3	0.0	57.8	39.5	0.0	34.3	0.6	0.0	0.2
Total	0	0	0.0	405	9.4	0.0	2.0	13.3	0.0	5.7	37.3	0.0	57.8	39.5	0.0	34.3	0.6	0.0	0.2

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 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 **2023**

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
Cleveland CSA	0	0	0.0	364	5.6	0.0	1.4	14.1	0.0	6.3	39.6	0.0	61.0	40.2	0.0	31.0	0.6	0.0	0.3
Total	0	0	0.0	364	5.6	0.0	1.4	14.1	0.0	6.3	39.6	0.0	61.0	40.2	0.0	31.0	0.6	0.0	0.3

*Source: 2023 D&B Data; 01/01/2023 - 12/31/2023 Bank Data; 2022 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
Cleveland CSA	--	--	--	439	95.9	--	65.4	2.4	--	1.7	--
Total	--	--	--	439	95.9	--	65.4	2.4	--	1.7	--

*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 **2022**

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
Cleveland CSA	--	--	--	405	97.3	--	68.9	1.5	--	1.1	--
Total	--	--	--	405	97.3	--	68.9	1.5	--	1.1	--

*Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 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 **2023**

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
Cleveland CSA	--	--	--	364	97.5	--	68.4	1.3	--	1.3	--
Total	--	--	--	364	97.5	--	68.4	1.3	--	1.3	--

*Source: 2023 D&B Data; 01/01/2023 - 12/31/2023 Bank Data; 2022 CRA 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
Altoona CSA	344	46,480,000	9.4	5,604	2.3	0.6	1.6	7.9	4.1	7.0	79.8	77.0	78.5	9.9	18.3	12.9	0.0	0.0	0.0
East Stroudsburg MSA	31	6,635,000	0.9	9,618	0.0	0.0	0.0	8.0	16.1	10.7	86.4	80.6	85.0	5.6	3.2	4.3	0.0	0.0	0.0
Erie CSA	429	56,915,000	11.8	10,877	3.9	0.7	2.0	7.5	3.5	6.8	61.0	62.0	56.3	27.7	33.8	34.9	0.0	0.0	0.0
Harrisburg CSA	921	208,755,000	25.3	59,778	2.9	2.3	2.8	10.0	7.4	8.9	63.1	52.4	60.4	24.0	37.9	27.9	0.0	0.0	0.0
Johnstown CSA	536	59,000,000	14.7	5,819	0.9	0.4	0.2	9.0	3.7	4.5	73.3	76.5	73.5	16.8	19.4	21.7	0.0	0.0	0.0
Lancaster MSA	195	52,505,000	5.3	24,681	1.6	2.1	2.2	8.8	9.7	10.3	76.1	60.5	72.6	13.5	27.7	14.9	0.0	0.0	0.0
PA non-MSA	579	77,425,000	15.9	14,897	0.0	0.0	0.0	8.9	7.8	6.7	80.4	83.6	78.6	10.6	8.6	14.7	0.0	0.0	0.0
Scranton MSA	264	48,630,000	7.2	19,384	1.6	0.0	1.5	14.2	10.6	13.6	56.5	40.5	51.8	27.6	48.5	33.0	0.0	0.4	0.1
State College MSA	258	50,290,000	7.1	5,658	0.0	0.0	0.0	16.0	18.2	15.7	51.7	46.5	46.1	31.5	34.9	36.9	0.8	0.4	1.4
Williamsport CSA	89	13,645,000	2.4	5,784	1.6	0.0	1.6	7.8	2.2	7.5	85.3	91.0	85.2	5.3	6.7	5.7	0.0	0.0	0.0
Total	3,646	620,280,000	100.0	162,100	1.8	0.9	1.8	9.9	7.2	9.4	69.2	64.7	65.6	19.1	27.2	23.2	0.0	0.1	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 O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2022-23**

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
Altoona CSA	515	59,555,000	9.0	2,868	1.1	0.4	0.8	12.5	6.8	13.8	67.9	64.3	65.5	18.5	28.5	19.9	0.0	0.0	0.0
East Stroudsburg MSA	26	5,720,000	0.5	4,645	0.0	0.0	0.0	6.7	7.7	8.2	77.4	73.1	77.8	14.9	19.2	12.4	1.0	0.0	1.7
Erie CSA	658	91,480,000	11.5	6,127	2.7	0.8	2.1	14.4	10.2	14.8	53.5	55.9	52.4	29.3	33.1	30.5	0.1	0.0	0.2
Harrisburg CSA	1,596	382,790,000	28.0	27,725	2.8	1.7	4.3	9.8	8.1	11.4	60.2	45.7	57.4	27.2	44.5	26.9	0.0	0.0	0.0
Johnstown CSA	819	85,015,000	14.4	3,656	2.0	1.0	1.1	7.7	4.6	5.2	69.7	73.6	72.3	20.7	20.8	21.3	0.0	0.0	0.0
Lancaster MSA	311	78,615,000	5.5	10,858	1.5	2.6	2.6	11.3	11.6	13.5	72.5	63.3	68.7	14.7	22.5	15.1	0.0	0.0	0.0
PA non-MSA	913	104,885,000	16.0	8,981	1.1	0.2	1.0	7.9	8.0	8.1	77.0	74.5	76.7	13.6	16.8	13.9	0.3	0.5	0.4
Scranton MSA	366	58,440,000	6.4	10,593	1.3	0.5	1.4	18.1	11.2	22.5	52.0	50.3	47.4	28.5	38.0	28.4	0.1	0.0	0.2
State College MSA	361	65,365,000	6.3	2,416	0.0	0.0	0.0	16.8	17.7	17.0	59.9	56.8	57.9	23.2	25.2	24.7	0.1	0.3	0.4
Williamsport CSA	134	18,740,000	2.4	3,359	1.0	0.7	1.6	3.9	2.2	4.5	77.7	79.1	74.9	17.2	17.9	18.9	0.2	0.0	0.1
Total	5,699	950,605,000	100.0	81,228	1.8	1.0	2.4	11.1	8.6	12.5	64.9	60.0	62.2	22.1	30.3	22.6	0.1	0.1	0.2

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 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
Altoona CSA	344	46,480,000	9.4	5,604	19.9	7.0	8.9	19.0	16.9	19.6	22.3	22.4	22.4	38.8	49.4	34.4	0.0	4.4	14.7
East Stroudsburg MSA	31	6,635,000	0.9	9,618	20.7	9.7	5.1	18.1	9.7	17.8	21.3	25.8	22.1	39.9	38.7	35.0	0.0	16.1	20.0
Erie CSA	429	56,915,000	11.8	10,877	20.9	3.0	6.4	17.9	14.5	18.3	21.1	18.2	22.5	40.0	55.5	39.5	0.0	8.9	13.3
Harrisburg CSA	921	208,755,000	25.3	59,778	19.4	6.0	7.8	18.3	17.0	19.2	22.3	17.6	22.2	40.0	54.0	32.6	0.0	5.4	18.2
Johnstown CSA	536	59,000,000	14.7	5,819	19.3	6.5	7.9	19.5	17.0	17.3	21.3	26.1	20.6	39.9	44.4	39.7	0.0	6.0	14.4
Lancaster MSA	195	52,505,000	5.3	24,681	18.3	3.1	7.0	19.2	10.3	21.2	23.1	18.5	24.0	39.4	59.5	33.7	0.0	8.7	14.0
PA non-MSA	579	77,425,000	15.9	14,897	19.3	5.9	6.4	18.9	17.8	18.1	21.8	26.1	23.0	40.0	48.2	37.0	0.0	2.1	15.5
Scranton MSA	264	48,630,000	7.2	19,384	21.3	3.8	8.2	17.6	15.2	18.0	20.5	21.2	20.5	40.6	54.9	34.4	0.0	4.9	18.9
State College MSA	258	50,290,000	7.1	5,658	19.6	9.3	7.1	18.5	19.0	17.2	21.5	25.2	23.8	40.3	42.6	40.2	0.0	3.9	11.7
Williamsport CSA	89	13,645,000	2.4	5,784	19.7	4.5	7.4	19.0	23.6	18.7	21.6	19.1	23.8	39.7	49.4	33.6	0.0	3.4	16.5
Total	3,646	620,280,000	100.0	162,100	19.7	5.7	7.4	18.5	16.6	19.0	21.8	21.7	22.4	39.9	50.7	34.6	0.0	5.3	16.6

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 **2022-23**

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
Altoona CSA	515	59,555,000	9.0	2,868	19.7	5.6	10.6	18.7	17.9	22.1	21.6	25.4	22.4	40.0	44.9	32.1	0.0	6.2	12.7
East Stroudsburg MSA	26	5,720,000	0.5	4,645	20.0	3.8	6.4	18.8	23.1	19.7	21.5	19.2	23.7	39.7	42.3	31.8	0.0	11.5	18.4
Erie CSA	658	91,480,000	11.5	6,127	20.2	6.2	10.1	18.3	19.5	22.8	21.7	21.7	24.5	39.8	43.0	31.3	0.0	9.6	11.4
Harrisburg CSA	1,596	382,790,000	28.0	27,725	18.9	6.4	9.8	18.7	17.7	22.7	23.2	22.9	23.3	39.1	46.9	29.8	0.0	6.1	14.3
Johnstown CSA	819	85,015,000	14.4	3,656	18.9	8.8	10.4	19.3	22.3	22.0	22.3	25.6	21.4	39.5	39.4	31.0	0.0	3.8	15.2
Lancaster MSA	311	78,615,000	5.5	10,858	17.4	4.2	6.9	19.3	17.4	22.6	24.6	21.2	25.6	38.8	49.8	34.5	0.0	7.4	10.5
PA non-MSA	913	104,885,000	16.0	8,981	18.9	9.2	8.7	18.5	20.6	22.1	21.8	25.5	23.8	40.8	39.0	31.8	0.0	5.7	13.7
Scranton MSA	366	58,440,000	6.4	10,593	21.6	6.6	11.1	17.3	16.7	21.6	20.5	21.3	21.2	40.6	50.5	27.1	0.0	4.9	19.0
State College MSA	361	65,365,000	6.3	2,416	18.2	14.1	13.2	19.0	21.3	22.6	23.2	24.9	23.1	39.5	36.8	31.8	0.0	2.8	9.3
Williamsport CSA	134	18,740,000	2.4	3,359	19.0	6.0	7.3	18.7	22.4	21.3	21.8	17.9	23.9	40.5	51.5	33.7	0.0	2.2	13.8
Total	5,699	950,605,000	100.0	81,228	19.2	7.5	9.4	18.6	19.3	22.2	22.5	23.6	23.4	39.7	43.8	30.9	0.0	5.8	14.2

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 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 **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
Altoona CSA	367	24,997	10.3	2,686	5.7	3.0	3.7	8.1	5.7	7.2	77.8	82.8	78.4	8.4	8.4	10.7	0.0	0.0	0.0
East Stroudsburg MSA	42	3,837	1.2	4,358	0.0	0.0	0.0	18.2	16.7	14.6	76.5	78.6	79.2	5.3	4.8	6.2	0.0	0.0	0.0
Erie CSA	555	65,015	15.6	5,849	12.4	6.8	10.3	10.9	8.1	9.7	52.4	62.5	54.1	24.3	22.5	26.0	0.0	0.0	0.0
Harrisburg CSA	761	68,379	21.4	21,481	6.9	6.6	5.5	14.8	16.6	12.3	56.9	55.7	59.8	21.4	21.2	22.3	0.0	0.0	0.0
Johnstown CSA	368	25,657	10.3	4,121	1.3	0.5	1.4	14.5	10.6	10.8	64.1	67.4	69.4	20.1	21.5	18.3	0.0	0.0	0.0
Lancaster MSA	226	31,685	6.4	13,518	4.1	5.3	3.6	11.0	22.1	9.9	72.4	57.1	73.7	12.4	15.5	12.8	0.0	0.0	0.0
PA non-MSA	529	42,801	14.9	8,809	0.0	0.0	0.0	11.8	9.5	9.5	75.1	83.7	75.8	13.0	6.8	14.6	0.1	0.0	0.0
Scranton MSA	275	30,060	7.7	11,665	2.8	1.8	2.3	19.4	18.9	17.1	51.2	49.5	52.6	24.6	28.4	26.5	2.1	1.5	1.5
State College MSA	322	26,724	9.1	2,677	1.6	0.0	0.0	18.3	22.1	18.4	38.5	42.9	42.1	31.9	24.8	30.9	9.6	10.2	8.7
Williamsport CSA	113	8,324	3.2	2,733	6.2	7.1	4.6	14.1	5.3	11.2	74.1	83.2	78.4	5.7	4.4	5.8	0.0	0.0	0.0
Total	3,558	327,479	100.0	77,897	4.7	3.5	3.6	14.3	13.1	12.1	62.0	64.5	64.8	18.4	17.8	18.9	0.7	1.0	0.5

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 Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022-23**

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
Altoona CSA	219	25,882	10.6	2,228	1.5	1.8	0.6	17.7	13.2	15.4	64.0	65.3	66.2	16.9	19.6	17.8	0.0	0.0	0.0
East Stroudsburg MSA	25	7,562	1.2	4,341	0.0	0.0	0.0	7.0	8.0	7.8	76.2	80.0	75.4	16.1	12.0	16.3	0.6	0.0	0.6
Erie CSA	326	51,813	15.8	4,926	7.9	3.4	6.4	19.2	16.3	16.2	44.5	53.7	46.5	26.7	24.8	28.9	1.7	1.8	2.0
Harrisburg CSA	328	53,756	15.9	19,824	6.6	4.6	4.4	14.7	11.6	11.8	53.7	50.0	58.7	24.9	33.8	25.1	0.0	0.0	0.0
Johnstown CSA	289	32,204	14.0	3,119	2.2	1.7	1.8	12.7	5.2	9.7	66.7	75.1	70.2	18.4	18.0	18.3	0.0	0.0	0.0
Lancaster MSA	132	28,611	6.4	12,170	3.7	4.5	2.6	11.4	12.9	10.4	69.1	72.7	71.9	15.8	9.8	15.2	0.0	0.0	0.0
PA non-MSA	382	49,968	18.5	8,231	1.3	0.8	0.8	8.8	3.4	6.4	74.4	82.2	76.7	14.3	13.6	15.3	1.2	0.0	0.8
Scranton MSA	156	23,816	7.5	10,356	4.8	3.8	3.9	24.5	14.1	22.0	42.9	42.9	44.7	27.5	39.1	29.1	0.4	0.0	0.4
State College MSA	139	17,488	6.7	2,273	1.4	0.0	0.0	16.7	31.7	15.9	48.1	54.0	54.0	26.8	11.5	25.4	7.0	2.9	4.6
Williamsport CSA	73	6,280	3.5	2,637	5.0	0.0	3.8	4.4	0.0	3.0	73.3	80.8	74.7	16.5	17.8	17.7	0.8	1.4	0.8
Total	2,069	297,380	100.0	70,105	4.5	2.4	3.1	14.7	11.3	12.3	58.5	64.3	62.4	21.6	21.5	21.7	0.7	0.5	0.5

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 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**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
Altoona CSA	367	24,997	10.3	2,686	83.8	78.5	53.3	4.7	20.2	11.5	1.4
East Stroudsburg MSA	42	3,837	1.2	4,358	90.7	64.3	48.1	2.5	31.0	6.9	4.8
Erie CSA	555	65,015	15.6	5,849	83.5	69.0	50.5	5.6	27.2	11.0	3.8
Harrisburg CSA	761	68,379	21.4	21,481	86.2	70.2	45.1	4.0	18.4	9.8	11.4
Johnstown CSA	368	25,657	10.3	4,121	82.4	73.4	45.3	5.0	22.8	12.5	3.8
Lancaster MSA	226	31,685	6.4	13,518	88.1	63.7	50.8	4.5	33.2	7.4	3.1
PA non-MSA	529	42,801	14.9	8,809	84.7	73.7	48.5	4.2	19.1	11.1	7.2
Scranton MSA	275	30,060	7.7	11,665	86.5	54.9	40.2	4.0	33.8	9.6	11.3
State College MSA	322	26,724	9.1	2,677	85.1	70.8	52.0	3.9	24.2	11.0	5.0
Williamsport CSA	113	8,324	3.2	2,733	84.7	80.5	47.5	4.2	16.8	11.1	2.7
Total	3,558	327,479	100.0	77,897	86.0	70.4	46.9	4.2	23.3	9.8	6.3

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%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2022-23**

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
Altoona CSA	219	25,882	10.6	2,228	85.6	67.6	54.6	4.0	31.1	10.4	1.4
East Stroudsburg MSA	25	7,562	1.2	4,341	92.5	80.0	55.0	1.8	20.0	5.7	0.0
Erie CSA	326	51,813	15.8	4,926	85.9	59.8	53.5	4.5	35.9	9.6	4.3
Harrisburg CSA	328	53,756	15.9	19,824	88.4	62.8	52.4	3.2	34.1	8.5	3.0
Johnstown CSA	289	32,204	14.0	3,119	84.6	59.9	56.8	4.3	37.4	11.2	2.8
Lancaster MSA	132	28,611	6.4	12,170	90.1	50.0	55.0	3.5	43.9	6.4	6.1
PA non-MSA	382	49,968	18.5	8,231	86.7	69.1	56.4	3.4	29.6	9.9	1.3
Scranton MSA	156	23,816	7.5	10,356	88.8	57.1	50.7	3.2	41.7	8.0	1.3
State College MSA	139	17,488	6.7	2,273	87.2	61.9	52.0	3.1	36.0	9.6	2.2
Williamsport CSA	73	6,280	3.5	2,637	86.7	83.6	52.5	3.5	15.1	9.8	1.4
Total	2,069	297,380	100.0	70,105	88.2	63.2	53.5	3.4	34.2	8.5	2.6

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 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

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
Altoona CSA	7	322	11.3	85	0.8	0.0	0.0	2.1	0.0	0.0	82.3	85.7	82.4	14.8	14.3	17.6	0.0	0.0	0.0
East Stroudsburg MSA	1	68	1.6	15	0.0	0.0	0.0	6.8	0.0	0.0	82.1	100.0	100.0	11.1	0.0	0.0	0.0	0.0	0.0
Erie CSA	6	435	9.7	97	2.5	0.0	1.0	5.3	0.0	8.2	66.6	83.3	77.3	25.6	16.7	13.4	0.0	0.0	0.0
Harrisburg CSA	2	398	3.2	637	1.4	0.0	0.6	5.5	0.0	1.9	71.4	50.0	86.8	21.7	50.0	10.7	0.0	0.0	0.0
Johnstown CSA	6	152	9.7	105	0.3	0.0	0.0	4.0	0.0	0.0	79.9	66.7	92.4	15.8	33.3	7.6	0.0	0.0	0.0
Lancaster MSA	1	315	1.6	1,231	0.8	0.0	0.0	3.2	0.0	0.2	86.5	100.0	95.0	9.5	0.0	4.8	0.0	0.0	0.0
PA non-MSA	18	971	29.0	503	0.0	0.0	0.0	2.0	5.6	0.6	84.3	94.4	87.5	13.6	0.0	11.9	0.0	0.0	0.0
Scranton MSA	0	0	0.0	54	1.8	0.0	0.0	10.4	0.0	3.7	54.1	0.0	66.7	33.5	0.0	27.8	0.3	0.0	1.9
State College MSA	7	571	11.3	77	0.2	0.0	0.0	16.0	85.7	40.3	55.7	0.0	45.5	27.1	14.3	14.3	1.0	0.0	0.0
Williamsport CSA	14	1,053	22.6	111	1.3	0.0	0.0	3.4	0.0	0.0	91.8	100.0	100.0	3.5	0.0	0.0	0.0	0.0	0.0
Total	62	4,285	100.0	2,915	1.0	0.0	0.2	5.0	11.3	2.0	76.0	79.0	89.2	17.9	9.7	8.5	0.1	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 S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2022-23**

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
Altoona CSA	5	142	8.8	82	0.2	0.0	0.0	6.4	0.0	0.0	74.5	80.0	81.7	18.9	20.0	18.3	0.0	0.0	0.0
East Stroudsburg MSA	0	0	0.0	12	0.0	0.0	0.0	4.6	0.0	0.0	82.9	0.0	83.3	12.0	0.0	16.7	0.4	0.0	0.0
Erie CSA	5	261	8.8	80	2.1	0.0	0.0	11.6	40.0	3.8	62.0	60.0	75.0	23.5	0.0	21.3	0.8	0.0	0.0
Harrisburg CSA	2	71	3.5	589	1.5	0.0	0.2	7.5	0.0	6.1	68.4	100.0	80.1	22.6	0.0	13.6	0.0	0.0	0.0
Johnstown CSA	7	141	12.3	117	0.8	0.0	0.0	5.4	0.0	8.5	77.0	85.7	82.1	16.8	14.3	9.4	0.0	0.0	0.0
Lancaster MSA	0	0	0.0	1,122	0.6	0.0	0.0	8.9	0.0	7.7	77.7	0.0	84.0	12.7	0.0	8.4	0.0	0.0	0.0
PA non-MSA	18	790	31.6	504	0.0	0.0	0.0	2.3	0.0	1.2	82.1	100.0	87.3	15.2	0.0	11.3	0.4	0.0	0.2
Scranton MSA	0	0	0.0	53	1.4	0.0	0.0	14.0	0.0	5.7	55.4	0.0	77.4	29.2	0.0	17.0	0.0	0.0	0.0
State College MSA	12	1,346	21.1	77	0.2	0.0	0.0	19.0	25.0	36.4	60.8	58.3	50.6	19.9	16.7	13.0	0.2	0.0	0.0
Williamsport CSA	8	863	14.0	102	1.1	0.0	1.0	0.8	0.0	2.0	83.2	87.5	89.2	14.4	12.5	7.8	0.5	0.0	0.0
Total	57	3,614	100.0	2,738	0.9	0.0	0.1	7.6	8.8	6.4	72.4	82.5	82.5	18.9	8.8	11.1	0.2	0.0	0.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 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
Altoona CSA	7	322	11.3	85	96.5	85.7	40.0	2.7	14.3	0.8	0.0
East Stroudsburg MSA	1	68	1.6	15	98.4	100.0	53.3	0.5	0.0	1.1	0.0
Erie CSA	6	435	9.7	97	95.9	100.0	54.6	2.6	0.0	1.5	0.0
Harrisburg CSA	2	398	3.2	637	97.6	100.0	66.2	1.3	0.0	1.2	0.0
Johnstown CSA	6	152	9.7	105	97.4	100.0	63.8	1.8	0.0	0.8	0.0
Lancaster MSA	1	315	1.6	1,231	96.7	100.0	80.5	2.4	0.0	1.0	0.0
PA non-MSA	18	971	29.0	503	97.9	88.9	57.3	1.3	11.1	0.8	0.0
Scranton MSA	--	--	--	54	97.4	--	66.7	1.9	--	0.8	--
State College MSA	7	571	11.3	77	97.6	100.0	83.1	1.2	0.0	1.2	0.0
Williamsport CSA	14	1,053	22.6	111	97.6	100.0	73.9	1.5	0.0	0.9	0.0
Total	62	4,285	100.0	2,915	97.3	95.2	70.2	1.7	4.8	1.0	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 2022-23

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
Altoona CSA	5	142	8.8	82	96.9	80.0	52.4	2.3	20.0	0.9	0.0
East Stroudsburg MSA	--	--	--	12	98.7	--	75.0	0.4	--	0.8	--
Erie CSA	5	261	8.8	80	96.7	100.0	43.8	2.1	0.0	1.2	0.0
Harrisburg CSA	2	71	3.5	589	98.0	100.0	69.8	1.0	0.0	1.1	0.0
Johnstown CSA	7	141	12.3	117	97.8	100.0	57.3	1.4	0.0	0.8	0.0
Lancaster MSA	--	--	--	1,122	96.9	--	81.3	2.1	--	1.1	--
PA non-MSA	18	790	31.6	504	98.0	88.9	58.9	1.2	11.1	0.8	0.0
Scranton MSA	--	--	--	53	97.5	--	75.5	1.6	--	0.9	--
State College MSA	12	1,346	21.1	77	97.7	91.7	76.6	1.0	8.3	1.2	0.0
Williamsport CSA	8	863	14.0	102	98.1	100.0	57.8	1.1	0.0	0.8	0.0
Total	57	3,614	100.0	2,738	97.6	93.0	70.6	1.4	7.0	1.0	0.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA 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
Charleston MSA	195	104,645,000	95.1	33,101	6.4	2.1	4.5	14.8	8.7	10.4	31.4	26.2	32.3	46.9	60.5	52.1	0.5	2.6	0.7
Greenville SC CSA	10	830,000	4.9	1,366	0.0	0.0	0.0	23.1	30.0	15.7	52.8	60.0	54.0	24.0	10.0	30.2	0.0	0.0	0.0
Total	205	105,475,000	100.0	34,467	5.5	2.0	4.3	15.9	9.8	10.6	34.3	27.8	33.1	43.8	58.0	51.3	0.5	2.4	0.7

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 O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2022**

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 SC CSA	5	1,565,000	100.0	1,104	0.0	0.0	0.0	15.4	20.0	11.6	59.2	40.0	61.0	25.4	40.0	27.4	0.0	0.0	0.0
Total	5	1,565,000	100.0	1,104	0.0	0.0	0.0	15.4	20.0	11.6	59.2	40.0	61.0	25.4	40.0	27.4	0.0	0.0	0.0

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 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 **2022-23**

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
Charleston MSA	352	252,400,000	100.0	11,574	4.4	2.6	4.1	15.9	4.0	13.4	25.6	27.0	28.5	52.9	64.2	52.7	1.2	2.3	1.3
Total	352	252,400,000	100.0	11,574	4.4	2.6	4.1	15.9	4.0	13.4	25.6	27.0	28.5	52.9	64.2	52.7	1.2	2.3	1.3

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 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 **2023**

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 SC CSA	58	23,730,000	100.0	15,596	2.1	0.0	2.7	15.5	13.8	14.2	38.1	41.4	40.7	44.1	44.8	42.1	0.2	0.0	0.3
Total	58	23,730,000	100.0	15,596	2.1	0.0	2.7	15.5	13.8	14.2	38.1	41.4	40.7	44.1	44.8	42.1	0.2	0.0	0.3

Source: 2020 U.S. Census; 01/01/2023 - 12/31/2023 Bank Data, 2023 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
Charleston MSA	195	104,645,000	95.1	33,101	22.8	2.1	4.1	15.2	7.2	13.1	17.6	10.3	17.4	44.4	72.3	49.0	0.0	8.2	16.4
Greenville SC CSA	10	830,000	4.9	1,366	23.7	20.0	3.0	16.5	0.0	16.8	18.0	10.0	24.9	41.8	50.0	38.4	0.0	20.0	17.0
Total	205	105,475,000	100.0	34,467	22.9	2.9	4.0	15.3	6.8	13.3	17.7	10.2	17.7	44.1	71.2	48.5	0.0	8.8	16.5

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 **2022**

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 SC CSA	5	1,565,000	100.0	1,104	19.7	0.0	4.8	19.2	20.0	17.0	18.8	20.0	26.4	42.2	60.0	37.0	0.0	0.0	14.7
Total	5	1,565,000	100.0	1,104	19.7	0.0	4.8	19.2	20.0	17.0	18.8	20.0	26.4	42.2	60.0	37.0	0.0	0.0	14.7

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 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 **2022-23**

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
Charleston MSA	352	252,400,000	100.0	11,574	21.2	1.1	4.0	15.4	7.1	11.5	18.1	12.5	16.4	45.3	74.4	49.7	0.0	4.8	18.4
Total	352	252,400,000	100.0	11,574	21.2	1.1	4.0	15.4	7.1	11.5	18.1	12.5	16.4	45.3	74.4	49.7	0.0	4.8	18.4

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 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 **2023**

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 SC CSA	58	23,730,000	100.0	15,596	18.7	0.0	4.1	16.5	12.1	15.5	19.9	6.9	21.6	44.9	58.6	40.6	0.0	22.4	18.2
Total	58	23,730,000	100.0	15,596	18.7	0.0	4.1	16.5	12.1	15.5	19.9	6.9	21.6	44.9	58.6	40.6	0.0	22.4	18.2

Source: 2020 U.S. Census; 01/01/2023 - 12/31/2023 Bank Data, 2023 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 **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
Charleston MSA	88	13,423	71.5	17,360	11.5	19.3	10.2	16.5	14.8	13.9	25.6	17.0	26.2	44.1	47.7	47.2	2.3	1.1	2.4
Greenville SC CSA	35	4,238	28.5	733	0.0	0.0	0.0	22.2	37.1	20.5	60.5	45.7	59.2	17.4	17.1	20.3	0.0	0.0	0.0
Total	123	17,661	100.0	18,093	10.9	13.8	9.8	16.8	21.1	14.2	27.7	25.2	27.6	42.5	39.0	46.1	2.1	0.8	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%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022**

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 SC CSA	7	2,376	100.0	796	0.0	0.0	0.0	17.0	0.0	13.3	67.1	100.0	65.1	16.0	0.0	21.6	0.0	0.0	0.0
Total	7	2,376	100.0	796	0.0	0.0	0.0	17.0	0.0	13.3	67.1	100.0	65.1	16.0	0.0	21.6	0.0	0.0	0.0

*Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 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 **2022-23**

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
Charleston MSA	35	6,800	100.0	15,918	8.1	25.7	6.7	19.9	31.4	15.7	22.3	17.1	25.2	48.0	20.0	49.6	1.7	5.7	2.8
Total	35	6,800	100.0	15,918	8.1	25.7	6.7	19.9	31.4	15.7	22.3	17.1	25.2	48.0	20.0	49.6	1.7	5.7	2.8

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 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 **2023**

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 SC CSA	12	4,248	100.0	15,676	2.8	0.0	2.7	16.8	0.0	16.3	31.3	25.0	33.5	48.0	75.0	46.4	1.0	0.0	1.2
Total	12	4,248	100.0	15,676	2.8	0.0	2.7	16.8	0.0	16.3	31.3	25.0	33.5	48.0	75.0	46.4	1.0	0.0	1.2

Source: 2023 D&B Data; 01/01/2023 - 12/31/2023 Bank Data; 2022 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 **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
Charleston MSA	88	13,423	71.5	17,360	84.5	72.7	44.3	4.7	22.7	10.8	4.5
Greenville SC CSA	35	4,238	28.5	733	79.9	65.7	55.3	4.2	34.3	16.0	0.0
Total	123	17,661	100.0	18,093	84.2	70.7	44.7	4.6	26.0	11.1	3.3

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%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2022**

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 SC CSA	7	2,376	100.0	796	86.5	42.9	57.2	2.7	42.9	10.8	14.3
Total	7	2,376	100.0	796	86.5	42.9	57.2	2.7	42.9	10.8	14.3

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 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 **2022-23**

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
Charleston MSA	35	6,800	100.0	15,918	93.0	45.7	49.2	1.8	48.6	5.2	5.7
Total	35	6,800	100.0	15,918	93.0	45.7	49.2	1.8	48.6	5.2	5.7

*Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 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 **2023**

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 SC CSA	12	4,248	100.0	15,676	91.5	58.3	51.1	2.3	41.7	6.2	0.0
Total	12	4,248	100.0	15,676	91.5	58.3	51.1	2.3	41.7	6.2	0.0

*Source: 2023 D&B Data; 01/01/2023 - 12/31/2023 Bank Data; 2022 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
Charleston MSA	0	0	0.0	51	5.6	0.0	2.0	15.3	0.0	5.9	39.0	0.0	45.1	39.3	0.0	47.1	0.8	0.0	0.0
Greenville SC CSA	0	0	0.0	11	0.0	0.0	0.0	10.9	0.0	9.1	63.6	0.0	72.7	25.5	0.0	18.2	0.0	0.0	0.0
Total	0	0	0.0	62	5.0	0.0	1.6	14.8	0.0	6.5	41.7	0.0	50.0	37.8	0.0	41.9	0.7	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 S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2022**

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 SC CSA	0	0	0.0	9	0.0	0.0	0.0	6.2	0.0	0.0	70.4	0.0	77.8	23.5	0.0	22.2	0.0	0.0	0.0
Total	0	0	0.0	9	0.0	0.0	0.0	6.2	0.0	0.0	70.4	0.0	77.8	23.5	0.0	22.2	0.0	0.0	0.0

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 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 **2022-23**

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
Charleston MSA	0	0	0.0	43	6.3	0.0	0.0	23.6	0.0	14.0	30.1	0.0	32.6	38.9	0.0	53.5	1.0	0.0	0.0
Total	0	0	0.0	43	6.3	0.0	0.0	23.6	0.0	14.0	30.1	0.0	32.6	38.9	0.0	53.5	1.0	0.0	0.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 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 **2023**

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 SC CSA	0	0	0.0	60	2.5	0.0	0.0	16.8	0.0	15.0	39.6	0.0	40.0	40.4	0.0	45.0	0.7	0.0	0.0
Total	0	0	0.0	60	2.5	0.0	0.0	16.8	0.0	15.0	39.6	0.0	40.0	40.4	0.0	45.0	0.7	0.0	0.0

Source: 2023 D&B Data; 01/01/2023 - 12/31/2023 Bank Data; 2022 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
Charleston MSA	--	--	--	51	93.4	--	66.7	3.5	--	3.1	--
Greenville SC CSA	--	--	--	11	97.3	--	27.3	1.8	--	0.9	--
Total	--	--	--	62	93.8	--	59.7	3.4	--	2.9	--

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 **2022**

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 SC CSA	--	--	--	9	98.8	--	33.3	0.6	--	0.6	--
Total	--	--	--	9	98.8	--	33.3	0.6	--	0.6	--

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 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 **2022-23**

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
Charleston MSA	--	--	--	43	96.6	--	65.1	1.4	--	2.0	--
Total	--	--	--	43	96.6	--	65.1	1.4	--	2.0	--

*Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 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 **2023**

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 SC CSA	--	--	--	60	97.4	--	56.7	0.9	--	1.8	--
Total	--	--	--	60	97.4	--	56.7	0.9	--	1.8	--

*Source: 2023 D&B Data; 01/01/2023 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*