



Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

January 2, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Community National Bank
Charter Number: 1368

4811 US Route 5
Derby, VT 05829

Office of the Comptroller of the Currency

75 Federal Street
Suite 805
Boston, MA 02110

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.

Table of Contents

Overall Community Reinvestment Act (CRA) Rating.....	2
Description of Institution.....	3
Scope of the Evaluation.....	4
Discriminatory or Other Illegal Credit Practices Review.....	6
State Rating.....	7
State of Vermont (VT).....	7
Community Development (CD) Test.....	14
Appendix A: Scope of Examination.....	A-1
Appendix B: Summary of State Ratings.....	B-1
Appendix C: Definitions and Common Abbreviations.....	C-1
Appendix D: Tables of Performance Data.....	D-1

Overall CRA Rating

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

The Lending Test is rated: Outstanding.

The Community Development Test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on Community National Bank's ('CNB' or 'the bank') record of performance in meeting the credit needs of the assessment areas (AAs) through its lending activities during the evaluation period. The evaluation period for the lending test covers the bank's performance from January 1, 2020, to December 31, 2022.
- Considering the bank's size, financial condition, and credit needs of the AAs, the bank's loan-to-deposit (LTD) ratio is reasonable.
- A majority of the bank's loans are inside its AAs.
- The bank exhibits an excellent geographic distribution of loans in the state.
- The bank exhibits an excellent distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.
- The bank was not subject to any CRA related complaints during the evaluation period.
- The Community Development (CD) Test rating is based on the bank's responsiveness to the community credit needs of its AAs through CD lending, investment, donations, and services, and based on a full-scope review, the bank exhibits adequate responsiveness to community development needs in the state.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio is reasonable. The bank's quarterly LTD ratio averaged approximately 86.9 percent over the 12-quarter evaluation period. During this period, the LTD ratio ranged from a quarterly low of 77.5 percent to a quarterly high of 101.7 percent. The quarterly LTD ratio marks a slight decline from the 93.3 percent cited during the bank's previous CRA performance as lending demand slowed during the height of the COVID 19 pandemic while customer deposits maintained modest growth during the evaluation period.

Lending in Assessment Area

A majority of the bank's loans are inside its AAs.

The bank originated and/or purchased 54.6 percent of its total loans by number inside the bank's AAs during the evaluation period of January 1, 2020, through December 31, 2022. This analysis is performed at a bank-wide level, rather than the AA level.

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	654	53.9	560	46.1	1,214	137,961	48.8	144,631	51.2	282,592
Small Business	31	77.5	9	22.5	40	2,350	68.7	1,069	31.3	3,419
Total	685	54.6	569	45.4	1,254	140,311	49.1	145,700	50.9	286,011

Description of Institution

Community National Bank is a single-state financial institution headquartered in Derby, VT with \$1.1 billion in total assets as of December 31, 2022. The bank's website, www.communitynationalbank.com, provides a full listing and description of offered products and services, for both personal and business banking lines, and the bank also provides on-line and mobile account management and bill pay services to its customers. The bank is wholly owned by Community Bancorp, a registered bank holding company. Ownership of the national bank is the parent's major activity, and the holding company also has a one-third ownership interest in a state-chartered non-depository trust company, Community Financial Services Group. No affiliate or subsidiary activities were included in scope for consideration as part of this performance evaluation.

The bank's rating area consists of two separate AAs in the state of VT. Within the bank's two AAs, CNB operates 12 full-service branches, including the main office, primarily serving the state's northern and central regions with automated teller machines (ATMs) at all bank locations. The main office is located at 4811 US Route 5, Derby, VT, 05829, in northern Orleans County, VT, with the remaining 11 branches dispersed amongst the VT counties of Caledonia, Essex, Franklin, Lamoille, and Washington. As of the 2020 U.S. Census, the main office along with four other branches are based in middle-income geographies, while six of the remaining seven branches are based in moderate-income geographies. The final branch is located in an upper-income geography; no geographies within the bank's AAs were designated as low-income during our evaluation period. We noted as part of this evaluation that all middle-income geographies within the bank's AAs were designated as distressed or underserved areas for the duration of the evaluation. Additionally, no branches were opened or closed during the evaluation period.

As of December 31, 2022, CNB reported total assets, total deposits, and tier 1 capital of approximately \$1.1 billion, \$924.3 million, and \$96.1 million, respectively. The loan portfolio totaled approximately \$740.3 million or 70.1 percent of total assets.

The table below provides a summary of the loan mix as of December 31, 2022.

Loan Portfolio Summary by Loan Product December 31, 2022	
Loan Category	% of Gross Loans and Leases
Non-farm Non-residential Real Estate	31.9
1-4 Family Residential Mortgages – Closed End	27.5
Commercial & Industrial	15.6
Multifamily	9.4
Municipal Loans	4.6
Construction & Development	3.8
Home Equity	3.7
Agricultural Loans/Farmland	2.9
Consumer	<1
Other	<1
Total	100.0

Source: Federal Deposit Insurance Corporation Call Report, December 31, 2022.

The bank has no financial or legal impediments in meeting the credit needs of the AAs. The bank was rated ‘Outstanding’ using Intermediate Small Bank (ISB) procedures at the last CRA performance evaluation dated September 28, 2020.

Scope of the Evaluation

Evaluation Period/Products Evaluated

CNB was evaluated using ISB procedures, which assess the bank’s CRA performance according to components of a Lending Test and CD Test. The Lending Test evaluates the banks record of meeting the community credit needs of its AAs through lending activities. The bank’s lending performance was assessed using home mortgage loans and small business loans originated during the evaluation period which spanned from January 1, 2020, to December 31, 2022, as home mortgage and small business loans accounted for approximately 30.4 percent and 51.7 percent of all originated loans by number, respectively. The CD Test evaluates the bank’s responsiveness to the community credit needs of its AAs through CD lending, investment, donations, and services. Examiners verified the accuracy of loan data and CD activities submitted by management as part of this evaluation prior to conducting analysis and drawing conclusions.

Due to updates made to demographic information during the evaluation period stemming from the 2020 U.S. Census, the bank’s lending activity from January 1, 2020, to December 31, 2021, was assessed separate from lending occurring during January 1, 2022, to December 31, 2022. Amongst the two periods, consideration was first assigned to the bank’s lending activity during 2020-2021, as this time period contained the majority of the bank’s lending when compared to 2022. For the geographic and borrower distribution analyses, loans originated and sampled during the 2020-2021 evaluation years were compared to the 2015 American Community Survey (ACS) Census while loans originated and sampled during the 2022 evaluation year were compared to the 2020 U.S. Census.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs within that state were selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA) 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 the State Rating section for details regarding how full-scope AAs were selected. Refer to the appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank’s overall rating is based primarily on the state rating applied to the AA that received the full-scope review.

As previously discussed, CNB’s primary lending products during the evaluation period were identified to be home mortgage and small business loans based on origination activity. Bank-wide amongst these two product types, consideration was first assigned to the bank’s small business loans as this product type accounted for 51.7 percent of all loan originations compared to home mortgage’s 30.4 percent market share.

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

Discriminatory or Other Illegal Credit Practices Review

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

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

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

State Rating

State of Vermont

CRA rating for the State of Vermont:	Outstanding
The Lending Test is rated:	Outstanding
The Community Development Test is rated:	Satisfactory

The major factors that support this rating include:

- The bank exhibits an excellent geographic distribution of loans in the state.
- The bank exhibits an excellent distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.
- The bank was not subject to any CRA related complaints during the evaluation period.
- Based on a full-scope review, the bank exhibits adequate responsiveness to community development needs in the state through community development loans, qualified investments and donations, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AAs.

Description of Institution's Operations in Vermont

The state of Vermont represents CNB's primary area of operations. As discussed previously, the bank's VT-based AAs are comprised of two separate AAs, the full-scope VT non-MSA AA and the limited-scope Burlington-South Burlington VT MSA AA, however banking operations do not significantly differ between the two AAs. The AAs consists of wholly contiguous political subdivisions in VT and do not arbitrarily exclude any low- and/or moderate-income geographies nor does the AA delineation contain an unexplained or conspicuous gaps. The full-scope VT non-MSA AA is comprised of all tracts in Caledonia, Essex, Lamoille, Orleans, and Washington Counties. The limited-scope Burlington-South Burlington VT MSA AA is comprised of partial Franklin County in VT, mainly the cities/towns of Bakersfield, Berkshire, Enosburg, Fairfield, Franklin, Highgate, Montgomery, Richard, and Sheldon.

Due to census updates, CNB did experience some changes to the number and income classification of AA geographies for both rating areas which we considered as part of our analysis of the bank's performance under the CRA. For the 2020-2021 evaluation years, the full-scope AA contained 49 census tracts, including nine moderate-, 32 middle-, and eight upper-income census tracts as of the 2015 ACS Census. For the 2022 evaluation year, the full-scope AA contained 50 census tracts, including ten moderate-, 30 middle-, and ten upper-income census tracts as of the 2020 U.S. Census. For the limited-scope AA, during the 2020-2021 evaluation years this rating area contained four census tracts, including two moderate- and two middle-income census tracts as of the 2015 ACS Census. For the 2020 evaluation year, the limited-scope AA contained a total of five census tracts, including two moderate- and three middle-income census tracts as of the 2020 U.S. Census. As previously stated, we also noted no geographies within the bank's AAs were designated as low-income during our evaluation period and all middle-income geographies within the bank's AAs were designated as distressed or underserved areas for the duration of the evaluation.

The bank's primary business focus is to originate loans funded by core deposits, and the bank faces significant competition for deposits in its AAs. Federal Deposit Insurance Corporation (FDIC) deposit

market share data for June 30, 2022, shows CNB ranking fourth among ten other institutions with the top five maintaining approximately 81 percent of the market. Leading competitors for deposits in the bank's AAs include TD Bank, National Association, Manufacturers and Traders Trust Company (M&T Bank), Union Bank, and Northfield Savings Bank.

As part of performance context for both segmented periods, when evaluating the bank's lending we considered the disparity between the median income of families compared to the median cost of housing and its overall impact to homeownership. Specifically for the full-scope AA, during 2021 approximately 12 percent of households were reported as being below the poverty level and 41.2 percent of households were low- or moderate-income. We noted 40.8 percent of households were classified as upper-income as of the 2015 ACS Census. For the full-scope AA during 2022, approximately 11.6 percent of AA households were below the poverty level and 40.6 percent of households were low- or moderate-income while 40.8 percent of households remained classified as upper-income as of the 2020 U.S. Census. The demographic characteristics of the limited-scope AA are comparable to the characteristics of the full-scope AA across both segmented periods. Elevated home prices in the full-scope VT non-MSA AA limits the availability of affordable housing, particularly for low-income groups. Specifically, the median housing values within the full-scope VT non-MSA AA during the evaluation period were high relative to the 2015 ACS and 2020 U.S Census reported adjusted median family incomes. According to 2015 ACS Census data for VT non-MSA geographies, the 2021 median family income reported for low-income families earning no more than \$32,419 or approximately 50 percent of the region's median family income would find it challenging to qualify for a mortgage loan given the area's \$196,056 median housing value. According to 2020 U.S. Census data for VT non-MSA geographies, the 2022 median family income reported for low-income families earning no more than \$38,587 or approximately 50 percent of the region's median family income would find it challenging to qualify for a mortgage loan given the area's \$213,531 median housing value.

VT non-MSA AA 2020-2021

Table A – Demographic Information of the Assessment Area						
Assessment Area: VT non-MSA AA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	49	0.0	18.4	65.3	16.3	0.0
Population by Geography	148,524	0.0	16.2	68.7	15.1	0.0
Housing Units by Geography	80,731	0.0	15.6	66.5	18.0	0.0
Owner-Occupied Units by Geography	45,398	0.0	13.9	69.6	16.5	0.0
Occupied Rental Units by Geography	15,478	0.0	19.7	65.4	15.0	0.0
Vacant Units by Geography	19,855	0.0	16.0	60.2	23.8	0.0
Businesses by Geography	17,309	0.0	12.2	64.6	23.2	0.0
Farms by Geography	1,159	0.0	8.8	76.4	14.8	0.0
Family Distribution by Income Level	37,770	20.5	18.4	22.4	38.6	0.0
Household Distribution by Income Level	60,876	24.9	16.3	18.0	40.8	0.0
Median Family Income Non-MSAs - VT		\$64,849	Median Housing Value			\$196,056
			Median Gross Rent			\$811
			Families Below Poverty Level			8.0%

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.*

VT non-MSA AA 2022

Table A – Demographic Information of the Assessment Area						
Assessment Area: VT non-MSA AA 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	50	0.0	20.0	60.0	20.0	0.0
Population by Geography	149,298	0.0	18.9	61.6	19.5	0.0
Housing Units by Geography	84,098	0.0	20.0	60.7	19.3	0.0
Owner-Occupied Units by Geography	46,526	0.0	17.5	63.8	18.7	0.0
Occupied Rental Units by Geography	16,732	0.0	24.5	53.3	22.2	0.0
Vacant Units by Geography	20,840	0.0	22.1	59.7	18.2	0.0
Businesses by Geography	19,839	0.0	16.6	52.4	31.0	0.0
Farms by Geography	1,290	0.0	13.3	66.8	19.8	0.0
Family Distribution by Income Level	38,764	21.7	18.9	21.6	37.7	0.0
Household Distribution by Income Level	63,258	24.3	16.3	18.6	40.8	0.0
Median Family Income Non-MSAs - VT		\$77,189	Median Housing Value			\$213,531
			Median Gross Rent			\$889
			Families Below Poverty Level			8.0%

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.*

A community contact was unable to be made during the evaluation; however, to supplement our assessment of the economic condition and demographic characteristics of the bank's AAs we referenced other recent community contact data collected for organizations operating within the region in addition to state of VT economic presentations. Leveraged community contact data for a local affordable housing community development organization indicated that the need for affordable housing, particularly for low- and moderate-income populations, is a longstanding need within central and northern VT that was only further exacerbated by pressures brought on by the COVID 19 pandemic and recent flooding disasters. The community contact also detailed that central and northern VT also exhibited the second highest rate of homelessness per capita in the country prior to the end of our evaluation period. Community contact data also reflects facts and data contained within recent state of VT economic presentations which indicate that regional housing shortages are evident within every market segment, including for low- and moderate-income households. Secondary needs prescribed by the community contact as evident in the region include community services, specifically food and shelter services, for low- and moderate-income populations. The community contact also referenced CNB as being a local financial institution with a presence responding to community credit needs.

Scope of Evaluation in Vermont

CNB delineated two separate AAs in the state of Vermont for review under the requirements of the CRA, and as mentioned previously, bank delineated AAs located in the same MSA are combined, analyzed, and presented as one AA for purposes of this evaluation. Similarly, bank delineated non-MSA AAs within the same state are combined, analyzed, and presented as one AA for purposes of this evaluation. Amongst the two AAs, the VT non-MSA AA was designated as full-scope while the Burlington-South Burlington VT MSA AA was designated as limited-scope as the majority of the bank's lending and deposit activity during the evaluation period was based within the VT non-MSA AA. Specifically, from January 1, 2020, through December 31, 2022, approximately 91.9 percent of primary product lending within the AAs was in the VT non-MSA AA based on number of loans. Additionally, via FDIC deposit market share reporting as of June 30, 2022, approximately 94.4 percent of the bank's deposit base and 91.7 percent of the bank's branches were located within the VT non-MSA AA. Refer to the appendix A, Scope of Examination, for additional information relative to the bank's full- and limited-scope AAs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN VERMONT

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's lending performance in the state of Vermont is excellent.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in the state.

Home Mortgage Loans

Refer to Table O in the state of Vermont 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 is excellent.

2020-2021

The geographic distribution of home mortgage loans is excellent.

The AA does not include any low-income census tracts. The percentage of home mortgage loans in moderate-income geographies exceeded both the percentage of owner-occupied (OO) units and aggregate lending in the AA.

2022

The geographic distribution of home mortgage loans is excellent.

The AA does not include any low-income census tracts. The percentage of home mortgage loans in moderate-income geographies exceeded both the percentage of OO units and aggregate lending in the AA.

Small Loans to Businesses

Refer to Table Q in the state of Vermont 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 overall geographic distribution of small loans to businesses loans is reasonable.

2020-2021

The geographic distribution of small loans to businesses is excellent.

The AA does not include any low-income census tracts. The percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of those businesses and aggregate lending in the AA.

2022

The geographic distribution of small loans to businesses is reasonable.

The AA does not include any low-income census tracts. The percentage of small loans to businesses in moderate-income geographies was somewhat lower than both the percentage of those businesses and aggregate lending in the AA.

Lending Gap Analysis

We reviewed demographic summary and mapping reports to identify any gaps in the geographic distribution of the bank's home mortgage loans and small loans to businesses in the VT non-MSA AA during the evaluation period. The analysis did not identify any unexplained or conspicuous gaps, given performance context.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to Table P in the state of Vermont 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 overall borrower distribution of home mortgage loans is reasonable.

2020-2021

The borrower distribution of home mortgage loans is reasonable.

The percentage of home mortgage loans to low-income borrowers was lower than the percentage of low-income families and exceeded aggregate lending in the AA. The percentage of home mortgage loans to moderate-income borrowers was somewhat lower than both the percentage of moderate-income families and aggregate lending in the AA.

2022

The borrower distribution of home mortgage loans is reasonable.

The percentage of home mortgage loans to low-income borrowers was lower than the percentage of low-income families and somewhat lower than aggregate lending in the AA. The percentage of home mortgage loans to moderate-income borrowers was somewhat lower than both the percentage of moderate-income families and aggregate lending in the AA.

Small Loans to Businesses

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

The overall borrower distribution of small loans to businesses is excellent.

2020-2021

The borrower distribution of small loans to businesses is excellent.

The percentage of small loans to businesses with gross annual revenues of \$1 million or less exceeded both the percentage of those businesses and aggregate lending in the AA.

2022

The borrower distribution of small loans to businesses is excellent.

The percentage of small loans to businesses with gross annual revenues of \$1 million or less was somewhat lower than the percentage of those businesses and exceeded aggregate lending in the AA.

Responses to Complaints

The bank was not subject to any CRA related complaints during the evaluation period.

Conclusions for Area Receiving a Limited Scope Review

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

COMMUNITY DEVELOPMENT TEST

The bank's performance under the CD Test in the state of Vermont is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibits adequate responsiveness to community development needs in the state through community development loans, qualified investments and donations, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AAs.

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
VT non-MSA AA	9	100.0	2,851	100.0
B-SB VT MSA AA	0	0.0	0	0.0

The bank provides an adequate level of CD loans in the full-scope VT non-MSA AA. During the evaluation period, CNB made nine qualified CD loans benefitting the full-scope VT non-MSA AA totaling approximately \$2.9 million or 3.0 percent of tier 1 capital as of December 31, 2022. CD loans submitted and qualified largely provided financing to organizations that provide community services, including food and shelter services, targeted towards low- and moderate-income populations. While the submitted amount of loans made by the bank during the evaluation period was greater than the qualified amount, some loans did not meet the definition of CD and/or were located outside of the delineated AA.

The highlights of the bank's CD loans in the VT non-MSA AA are as follows:

- A \$400,000 loan to a local community housing organization to fund the purchase and development of affordable housing for disabled tenants, including low-income housing units.
- An SBA 504 loan to a local small business for \$288,050 that created full-time jobs, including jobs for low- and moderate-income persons.
- A \$163,000 loan to a local community service agency to provide emergency transportation services for low- and moderate-populations in Lamoille County, VT, with a particular focus on the homeless.
- A \$40,000 loan provided to a community organization that provides family and youth services for low- and moderate-income families located in Washington County, VT.

Number and Amount of Qualified Investments

Qualified Investments								
Assessment Area	Prior Period*		Current Period		Total			
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
VT non-MSA AA	4	1,794	322	3,504	326	81.5	5,298	98.7
B-SB VT MSA AA	0	0	67	64	67	16.8	64	1.2
Statewide	0	0	7	6	7	1.8	6	0.1

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

CNB's investments and donations demonstrate adequate responsiveness to credit and community development needs of the VT non-MSA AA. Within the full-scope AA specifically, qualified investments totaled approximately \$4.8 million or 4.96 percent of tier 1 capital as of December 31, 2022. The bank made two new investments to support affordable housing initiatives in the VT non-MSA AA during the evaluation period totaling \$3.0 million. As of this evaluation, the bank also had four prior period investments earmarked to the VT non-MSA AA totaling approximately \$1.8 million. For qualified donations, CNB made 320 CD-eligible donations amongst a variety of community organizations operating within the full-scope VT non-MSA AA, totaling approximately \$529,516 or 0.55 percent of tier 1 capital for the evaluation period. Donations were made to qualified CD organizations that supporting community services targeted towards low- and moderate-income populations and support affordable housing initiatives in VT. While the bank's actual level of charitable giving in the AAs was higher, these 320 instances of giving in the full-scope AA were verified as meeting the definition of CD.

The highlights of the bank's CD investments/donations in the VT non-MSA AA are as follows:

- A \$626,728 prior period investment to support an affordable housing organization operating in Orleans County, VT.
- A \$238,012 prior period investment to support low-income programming for a senior housing development organization based in Caledonia County, VT.
- A \$25,000 community donation to a local housing partnership to develop, rehabilitate, and maintain affordable housing for low- and moderate-income families living in Lamoille County, VT.
- A \$5,000 community donation to a local affordable housing developer that operates in the VT Northeast Kingdom that includes the bank's AAs. This donation was specifically to sponsor a homebuyer education workshop benefiting majorly low- and moderate-income groups.

Extent to Which the Bank Provides Community Development Services

The bank provides an excellent level of CD services in the full-scope AA. During the evaluation period, 54 bank personnel provided approximately 2,795 service hours across 70 different qualified CD organizations that benefited either the full-scope VT non-MSA AA, the limited-scope Burlington-South Burlington VT MSA AA, and/or the statewide region. Within the full-scope AA, the bank provided a total of 2,618 service hours that were primarily to organizations that provide for community services targeted towards low- and/or moderate-income populations or in low- and/or moderate-income geographies, however bank personnel also offered service hours tied to affordable housing and economic development as secondary CD initiatives. While the number of submitted service hours was greater than the qualified amount, some services did not meet the definition of CD and/or were located

outside of the delineated AAs. Consideration was also given to the fact that two years of the evaluation period, 2020 and 2021, were during the height of the COVID 19 pandemic where many organizations needed to halt operations and cease in-person services.

The highlights of the bank's CD services are as follows:

- A senior bank employee volunteers time to a community development organization based in the VT Northeast Kingdom region that fosters and promotes the economic and social improvement of the region with a specific emphasis on community services targeted towards low- and/or moderate-income populations.
- A bank employee volunteers as a member of a state community foundation that provides financial literacy services for both the bank's delineated AAs and across the state.
- A senior bank employee serves on the board for a local, non-profit community organization whose purpose is to foster the economic development of small businesses and low- and/or moderate-income areas in VT's Northeast Kingdom region.
- Several employees volunteer with local secondary schools to provide financial literacy education training and classes for students, including those students from low- and/or moderate-income households.

Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, the bank's performance under the CD Test in the Burlington-South Burlington VT MSA AA is weaker than the bank's overall performance under the CD Test in the full scope area.

CD lending in the Burlington-South Burlington VT MSA AA is considered very poor as the bank did not make any qualified CD loans within the limited-scope AA during the evaluation period. CD investment and donation activity in the Burlington-South Burlington VT MSA AA is considered poor. During the evaluation period CNB did not make any qualified investments within the limited-scope AA, however the bank did provide 67 qualified CD donations totaling approximately \$64,000 or 0.1 percent of tier 1 capital, to a variety of community organizations operating within the limited-scope Burlington-South Burlington VT MSA AA. CD service activity in the Burlington-South Burlington VT MSA AA is considered poor as the bank provided 141 service hours to qualified CD organizations operating in the limited-scope AA.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSA(s) and non-MSA(s) 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:	(01/01/2020 to 12/31/2022)	
Bank Products Reviewed:	Home mortgage and small business loans Community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None reviewed.		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Vermont		
VT non-MSA AA	Full-scope	<ul style="list-style-type: none"> • VT non-MSA <ul style="list-style-type: none"> • Full Caledonia, Essex, Lamoille, Orleans, and Washington Counties
Burlington-South Burlington VT MSA AA	Limited-scope	<ul style="list-style-type: none"> • Burlington-South Burlington VT MSA <ul style="list-style-type: none"> • Partial Franklin County <ul style="list-style-type: none"> • Cities of Bakersfield, Berkshire Enosburg, Fairfield, Franklin, Highgate, Montgomery, Richford, and Sheldon

Appendix B: Summary of State Ratings

RATINGS COMMUNITY NATIONAL BANK			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/ Rating
Community National Bank	Outstanding	Satisfactory	Outstanding
State:			
Vermont	Outstanding	Satisfactory	Outstanding

(*) The Lending Test and Community Development Test carry equal weight 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.

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.

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 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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 (MD): 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 (MSA): 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.

Owner-Occupied (OO) 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.

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 are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

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

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

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
VT non-MSA AA	357	70,372	92.5	6,075	0.0	0.0	0.0	13.9	22.1	11.0	69.6	72.3	63.0	16.5	5.6	26.1	0.0	0.0	0.0
B-SB VT MSA AA	29	4,935	7.5	868	0.0	0.0	0.0	40.4	79.3	38.5	59.6	20.7	61.5	0.0	0.0	0.0	0.0	0.0	0.0
Total	386	75,306	100.0	6,943	0.0	0.0	0.0	16.8	26.4	14.4	68.5	68.4	62.8	14.7	5.2	22.8	0.0	0.0	0.0

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

Table 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
VT non-MSA AA	261	61,564	97.4	4,370	0.0	0.0	0.0	17.5	37.5	17.4	63.8	57.1	60.9	18.7	5.4	21.7	0.0	0.0	0.0
B-SB VT MSA AA	7	1,091	2.6	602	0.0	0.0	0.0	38.3	71.4	42.2	61.7	28.6	57.8	0.0	0.0	0.0	0.0	0.0	0.0
Total	268	62,655	100.0	4,972	0.0	0.0	0.0	19.8	38.4	20.4	63.6	56.3	60.5	16.6	5.2	19.1	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%.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

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
VT non-MSA AA	357	70,372	92.5	6,075	20.5	6.4	5.1	18.4	16.0	17.7	22.4	14.6	20.9	38.6	31.1	44.0	0.0	31.9	12.2
B-SB VT MSA AA	29	4,935	7.5	868	27.6	24.1	13.5	25.7	17.2	28.6	24.1	17.2	22.8	22.6	37.9	19.5	0.0	3.4	15.7
Total	386	75,306	100.0	6,943	21.4	7.8	6.2	19.3	16.1	19.1	22.6	14.8	21.1	36.7	31.6	40.9	0.0	29.8	12.7

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
VT non-MSA AA	261	61,564	97.4	4,370	21.7	5.7	7.9	18.9	15.3	19.0	21.6	20.7	22.3	37.7	30.7	40.5	0.0	27.6	10.3
B-SB VT MSA AA	7	1,091	2.6	602	28.1	14.3	17.9	22.3	28.6	30.2	23.3	28.6	26.6	26.3	28.6	15.3	0.0	0.0	10.0
Total	268	62,655	100.0	4,972	22.5	6.0	9.1	19.3	15.7	20.4	21.8	20.9	22.8	36.5	30.6	37.4	0.0	26.9	10.3

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%.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
VT non-MSA AA	24	1,720	52.2	3,426	0.0	0.0	0.0	12.2	12.5	10.5	64.6	83.3	58.3	23.2	4.2	31.2	0.0	0.0	0.0
B-SB VT MSA AA	22	4,019	47.8	263	0.0	0.0	0.0	45.2	90.9	48.3	54.8	9.1	51.7	0.0	0.0	0.0	0.0	0.0	0.0
Total	46	5,739	100.0	3,689	0.0	0.0	0.0	14.6	50.0	13.2	63.9	47.8	57.8	21.5	2.2	29.0	0.0	0.0	0.0

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

Table 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
VT non-MSA AA	20	4,193	100.0	3,278	0.0	0.0	0.0	16.6	10.0	16.8	52.4	75.0	50.2	31.0	15.0	33.0	0.0	0.0	0.0
B-SB VT MSA AA	0	0	0.0	285	0.0	0.0	0.0	37.0	0.0	31.9	63.0	0.0	68.1	0.0	0.0	0.0	0.0	0.0	0.0
Total	20	4,193	100.0	3,563	0.0	0.0	0.0	18.1	10.0	18.0	53.2	75.0	51.7	28.7	15.0	30.3	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%.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
VT non-MSA AA	24	1,720	52.2	3,426	85.9	100.0	39.1	4.3	0.0	9.8	0.0
B-SB VT MSA AA	22	4,019	47.8	263	88.8	95.5	44.9	3.2	4.5	8.1	0.0
Total	46	5,739	100.0	3,689	86.1	97.8	39.6	4.2	2.2	9.7	0.0

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											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
VT non-MSA AA	20	4,193	100.0	3,278	87.6	80.0	47.6	3.6	20.0	8.8	0.0
B-SB VT MSA AA	0	0	0.0	285	90.6	0.0	54.7	2.5	0.0	6.9	0.0
Total	20	4,193	100.0	3,563	87.9	80.0	48.1	3.5	20.0	8.7	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%.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.