



## **PUBLIC DISCLOSURE**

August 25, 2025

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

City National Bank of West Virginia  
Charter Number: 14807

3601 Maccorkle Avenue, S.E.  
Charleston, West Virginia 25301

Office of the Comptroller of the Currency

4419 Pheasant Ridge Road, Suite 300  
Roanoke, Virginia 24014

**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 City National Bank of West Virginia with respect to the Lending, Investment, and Service Tests:

Performance Levels	City National Bank of West Virginia Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	x	x	x
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- The Lending Test rating is based on the rating of High Satisfactory for the Charleston CSA, the Washington CSA, and the states of Kentucky, Virginia, and West Virginia; and the rating of Low Satisfactory for the state of Ohio. The rating areas of Charleston CSA and the state of West Virginia received greater weight. Lending performance reflects good responsiveness to credit needs, a good geographic distribution of loans, and a good distribution of loans among individuals of different income levels and businesses of different sizes. Community development (CD) loans had a positive impact on the Charleston CSA, the Washington CSA, and the states of Kentucky and West Virginia.
- The Investment Test rating is based on performance across all rating areas. The rating areas of Charleston CSA and the state of West Virginia received greater weight. The bank had a significant level of qualified community development (CD) investments and grants across the rating areas. Investments exhibited adequate responsiveness to credit and CD needs; and the bank rarely used complex investments to support CD initiatives.
- The Service Test rating is based on the performance across all rating areas. The rating areas of Charleston CSA and the state of West Virginia received greater weight. Service delivery systems are accessible to geographies and individuals of different income levels in the assessment areas (AAs). The bank provided a relatively high level of CD services.

### Lending in Assessment Area

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

The bank originated and purchased 90.6 percent of its total loans inside the bank's AAs during the evaluation period. This analysis was performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. This performance factored into the overall analysis of the geographic distribution of loans.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	8,792	90.68	904	9.32	9,696	1,109,654	77.72	318,107	22.28	1,427,761
Small Business	2,333	90.88	234	9.12	2,567	263,211	84.20	49,385	15.80	312,596
Small Farm	134	83.75	26	16.25	160	8,607	77.59	2,486	22.41	11,093
<b>Total</b>	11,259	90.63	1,164	9.37	12,423	1,381,472	78.88	369,978	21.12	1,751,450

Source: 1/1/2021 - 12/31/2023 Bank Data.  
Due to rounding, totals may not equal 100.0%

## Description of Institution

City National Bank of West Virginia (CNB or “the bank”) is a full-service bank founded in 1957, and is headquartered in Charleston, West Virginia. CNB is wholly owned by City Holding Company (CHCO), also headquartered in Charleston, WV. As of December 31, 2023, the bank reported total assets of \$6.1 billion. On October 18, 2022, CHCO announced the acquisition of Citizens Commerce Bancshares, Inc., the parent company of Citizens Commerce Bank, Inc. in Versailles, KY. Through this acquisition, Citizens Commerce Bank Inc., a subsidiary of Citizens Commerce Bancshares, Inc., merged into CNB. Through this merger, CNB acquired five branches.

CNB’s business strategy is retail home mortgage loans and retail banking products. CNB offers a full range of deposit products to individuals and businesses. CNB’s loan products include home mortgage loans, personal loans, auto loans, and commercial loans. As of December 31, 2023, the bank’s loan portfolio represented 67.1 percent of total assets or \$4.1 billion. CNB is primarily a residential mortgage lender with 87.9 percent of total loans secured by residential real estate. Commercial loans represented the second largest category of loans totaling 10 percent. Total deposits as of December 31, 2023, were \$5.0 billion, and tier 1 capital equaled \$549 million.

As of December 31, 2023, CNB AAs included 10 AAs in the states of Kentucky, Ohio, Virginia, and WV. The AAs include the Combined Statistical Area (CSA) of Charleston CSA, Washington-Baltimore-Arlington, DC-MD-VA-WV-PA (Washington CSA), two AAs in Kentucky, one AA in Ohio, two AAs in Virginia, and three AAs in West Virginia. The bank operates 98 branches with 62 deposit taking Automated Teller Machines (ATMs) and 43 deposit taking Interactive Teller Machines (ITMs). The bank has one ATM that does not accept deposits due to limited space at the branch. There are no free-standing ATMs. Branch distribution is as follows: 36 branches in the Charleston CSA, ten branches in the Washington CSA, 14 branches in Kentucky, one branch in Ohio, 10 branches in Virginia, and 27 branches in West Virginia.

During the evaluation period, the bank opened one branch in Falling Waters, WV, located in a middle-income census tract (CT) in the Hagerstown-Martinsburg MSA (Hagerstown MSA). The bank closed one branch in Martinsburg, WV, located in a moderate-income CT in the Hagerstown MSA. This branch was closed due to its close proximity (less than 1.5 miles) to the existing King Street branch also located in a moderate-income CT. The bank closed a branch in Nicholasville, KY, located in a middle-income CT in the Lexington-Fayette MSA (Lexington MSA). This branch was closed due the high lease cost and to its close proximity (less than 1.5 miles) to the existing Nicholasville branch located in the same middle-income CT.

CNB's AA meets regulatory requirements and does not arbitrarily exclude any low- and moderate-income (LMI) CTs. The bank does not have any legal, financial, or other factors impeding the bank's ability to meet community credit needs of its AAs during the evaluation period.

CNB does not have any legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AA during the evaluation period.

CNB's most recent Performance Evaluation (PE) dated January 10, 2022, resulted in a Satisfactory rating.

## **Product Innovation and Flexibility**

### **Lending Products**

CNB offered its own first-time homebuyers' program for LMI borrowers purchasing homes in the bank's AAs. The City Start program featured flexible credit score allowances and debt-to-income ratios, and low-down payment requirements with no Private Mortgage Insurance (PMI) requirements. During the evaluation period, the bank originated 33 City Start loans totaling \$4.0 million that benefitted the Charleston CSA, the Washington CSA, the WV Non-MSA, the Morgantown MSA, the Beckley MSA, and the Staunton MSA.

CNB also continued to participate in the West Virginia Housing Development Fund's First Time Homebuyer Program. This program featured up to 100 percent financing and down payment and closing cost assistance. Borrower incomes must be within limits of the county where the home is being purchased. During the evaluation period, the bank originated 90 loans totaling \$9.4 million through the West Virginia Housing Development Fund's First Time Homebuyer Program. The Charleston CSA, the Washington CSA, the Beckley MSA, and the WV Non-MSA benefitted from the program.

CNB participated in the West Virginia Housing Development Fund's Movin' Up Program. This program featured a reduced interest rate and lower cost PMI. The program does not have a first-time homebuyer requirement and was designed to help moderate-income first-time or repeat homebuyers purchase a new residence. Borrower qualifying income must be at or below 80 percent of the Area Median Income for their federally designated income tract. During the evaluation period, the bank originated seven loans totaling \$902,803 through the West Virginia Housing Development Fund's Movin' Up Program. The Charleston CSA, the Washington CSA, and the Beckley MSA benefitted from the program.

### **Retail Banking Products**

The bank's retail products include a low-cost checking account with no maintenance fees and Bounceback Checking accounts for individuals looking to rebuild a positive checking relationship. CNB also allows free withdrawals from the bank's ATMs for customers accessing their Electronic Benefit Transfer funds. CNB offered Checkless Checking beginning in August 2022. The product is a BankOn-certified debit account designed to help the customer access their money without overdraft or non-sufficient funds (NSF) fees. The bank did not provide metrics to demonstrate the effectiveness of these products in helping meet the needs of low-income and moderate-income individuals or communities, so no significant weight was given to these products or services.

CNB offers online banking and mobile banking. Through online banking, customers can view balances, transfer funds, and make payments online. Through the bank's mobile banking service, customers can

deposit checks, transfer money to internal and external accounts, send person-to-person payments, view transactions, check balances, pay bills, and order checks. The bank did not provide metrics to demonstrate the effectiveness of these products in helping meet the needs of low-income and moderate-income individuals or communities, so no significant weight was given to these services.

CNB provides customers with expanded access to branch services through video tellers, known as Interactive Teller Machines (ITMs). The ITMs are similar to an ATM but has video chat capability with a live CNB teller. The video teller can perform a variety of services for customers including depositing and cashing checks. As of December 31, 2023, CNB had 43 ITMs located either inside branch lobbies or at drive through windows. The ITMs located in the drive through windows have extended hours Mondays through Fridays from 8:00 a.m. to 7:00 p.m. and Saturdays from 8:00 a.m. until 1:00 p.m. The bank did not provide metrics to demonstrate the effectiveness of these products in helping meet the needs of low-income and moderate-income individuals or communities, so no significant weight was given to this product.

### **Community Development Activities in Broader Regional/Statewide Area**

In addition to the qualified investments made in the AAs during the current evaluation period, CNB maintained two prior period low-income housing tax credits (LIHTCs) with an outstanding balance of \$350,000. These LIHTCs benefited two affordable housing developments in Harrison, Greenbrier, and Putnam Counties in West Virginia, Boyd and Fayette Counties in Kentucky, and Franklin County, Ohio.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

This PE assesses the bank's CRA performance under the large bank Lending, Investment, and Service Tests. The evaluation period is January 1, 2021, through December 31, 2023. In evaluating the bank's lending performance, the OCC reviewed home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA), small loans to businesses and farms reported under the CRA, and CD loans. Examiners also evaluated qualified investments, retail services, and CD services from January 1, 2021, through December 31, 2023. Small farm loans were evaluated only in the state of Kentucky as CNB did not originate or purchase a sufficient volume of small farm loans in the other AAs. Examiners did not consider consumer loans in this evaluation, as consumer lending did not constitute a substantial majority of the bank's business.

The bank's primary loan products during the evaluation period were home mortgage loans and small business loans, with an emphasis on home mortgage lending as that comprised the majority of the bank's lending activity. Therefore, the review considered home mortgage lending performance more than small business lending performance in arriving at conclusions and overall ratings.

The OCC compared bank loan data for all applicable years to the following: demographic data using the 2015 American Community Survey (ACS) and the 2020 U.S. Census; Federal Financial Institutions Examination Council (FFIEC) adjusted median family incomes (AMFI); 2021 and 2023 Dun and Bradstreet (D&B) small business demographic data; 2023 peer mortgage loan data reported under HMDA; and 2023 peer small business data reported under CRA. The OCC used data from the following: the Federal Deposit Insurance Corporation (FDIC), the U.S. Bureau of Labor Statistics (BLS), and Realtor.com.

## **Census Demographic Changes**

Due to updated 2020 Census data and CT income level designation changes that became effective January 1, 2022, the OCC conducted a separate analysis of CNB's lending performance during January 1, 2021, through December 31, 2021 (2021 period) and January 1, 2022, through December 2023 period (2022-2023 period). The OCC analyzed the bank's home mortgage lending, small loans to businesses, and small loans to farms lending performance for the 2021 period using the 2015 American Community Survey (ACS) demographic information. For the 2022-2023 period, the OCC used the 2020 Census demographic information to analyze the bank's lending performance. Except where noted, the OCC provided more consideration to the bank's lending performance during the 2022-2023 period as it represented a longer period of performance. The OCC evaluated the bank's lending performance for the 2021 period in comparison to the 2022-2023 period and, where applicable, discussed the factors contributing to differences in lending performance between the two periods.

During the evaluation period, changes in the ACS resulted in changes to geographic income classifications for low-, moderate-, middle-, and upper- income CTs. Performance tables in appendix D reflect these changes with separate 2021 performance tables and combined 2022-2023 performance tables. However, all performance is considered in arriving at our overall conclusions and ratings. Refer to the Ratings section for more information on AA ratings considerations.

## **Affordability Analysis**

The OCC conducted an affordability analysis for all full-scope AAs. The goal was to determine if either low- to moderate-income (LMI) borrowers could reasonably afford a home mortgage loan in their respective AA. To determine affordability, the OCC used the FFIEC AMFI found in the respective Table A, for each AA. The OCC calculated a payment based on a 6 percent mortgage interest rate, with a 30-year loan amortization. The analysis concluded that home mortgages were unaffordable, if the principal and interest payment exceeded 30 percent of the calculated AA debt-to-income ratio.

This information was used as performance context in the borrower distribution of home mortgage loans when determined to be relevant to the performance conclusions in each full-scope AA. See the "Description of the Institution's Operations" in each state for information relating to our determination of affordability.

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

In each state where the bank has an office, one or more AA(s) within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA), if applicable are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope.

Refer to the "Scope" section under each State Rating section for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

## **Ratings**

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

The MMSA and state ratings in rating areas with a single AA are based on performance in that AA. The MMSA and state ratings in rating areas with multiple AAs are based on the combination of conclusions in those AAs. Refer to the "Scope" section under each MMSA and State Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Generally, under the Lending Test, equal emphasis is given to the geographic distribution of the bank's loans and the bank's lending by borrower income level.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c) (March 29, 2024) 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 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 has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) 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.

## **Combined Statistical Area Rating**

### **Charleston-Huntington-Ashland WV-OH-KY Combined Statistical Area (Charleston CSA)**

**CRA rating for the Charleston CSA<sup>1</sup>: Satisfactory**

**The Lending Test is rated:** High Satisfactory

**The Investment Test is rated:** Low Satisfactory

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflected good responsiveness to the credit needs in the AA.
- The geographic distribution of loans was adequate.
- The distribution of home mortgage loans to individuals of different income levels and small businesses of different sizes was good.
- The bank made a relatively high level of CD loans.
- The bank had an adequate level of qualified investments and grants.
- 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.

### **Description of Institution's Operations in Charleston CSA**

The Charleston CSA is comprised of the full Charleston MSA and partial Huntington-Ashland MMSA. The Charleston MSA is comprised of the counties of Boone, Clay, Jackson, Kanawha, and Lincoln in West Virginia. The Huntington-Ashland MMSA is comprised of the counties of Boyd, Carter, and Greenup in Kentucky; Lawrence County in Ohio; and the counties of Cabell, Putnam, and Wayne in West Virginia. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies. Refer to Appendix A for a listing of all the bank's AAs.

Based on the FDIC Summary of Deposit Market Share Report as of June 30, 2023, the bank had a 14.3 percent deposit market share and ranked second out of 29 financial institutions doing business within the rating area. Bank deposits in the AA accounted for 43 percent of its total deposits. Strong competition for

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<sup>1</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

financial services existed within the bank's AA, which includes nationwide and regional institutions. Top competitors and their respective deposit market share include Truist Bank, ranked first at 18.5 percent with 12 offices, United Bank, ranked third at 13 percent with 11 offices, and JPMorgan Chase Bank, NA, ranked fourth at 9.2 percent with eight offices in the AA.

CNB provided a full range of loan and deposit products and services in the AA. The bank operated 36 full-service branches in the rating area. All branches in the AA had an on-site ATM with cash dispensing capabilities. The branches represented 36.7 percent of the bank's total branch network.

### **Economic Conditions**

According to Moody's Analytics, Charleston's job growth has slowed, with losses in key sectors like transportation, professional services, finance, and hospitality offsetting gains in mining and healthcare. Although the unemployment rate is lower than the national average, this is partly due to a stagnant labor force. House prices have risen slowly since the pandemic but increased above average recently.

Charleston's reliance on coal mining, one of the few sources of well-paying jobs, poses challenges. Coal mining jobs have dropped significantly, employing only one-third as many people as in 2010, with layoffs and competition from natural gas impeding growth. The state government's employment expansion has aided the economy.

Charleston faces demographic hurdles, with continuous population decline since 1980 and a severe drop in 2023. With deaths outnumbering births and skilled workers leaving, only the senior citizen demographic is expanding. Weak demographics will constrain growth in retail, hospitality, healthcare, and housing, restricting overall economic development.

### **Employment**

According to Moody's Analytics, top employers in the AA include Charleston Area Medical Center, Herbert J. Thomas Memorial Hospital Assoc., Frontier Communications, Walmart Inc., and Dow Chemical Company.

According to the BLS, the unemployment rate declined throughout the evaluation period in the AA. In January 2021, the rate was 7 percent compared to 4.2 percent in December 2023. The unemployment rate in the AA was higher than the overall rate for the state of West Virginia, which was 3.8 percent at the end of the evaluation period. The national unemployment rate was 6.4 percent in January 2021 and 3.8 percent in December 2023.

### **Housing**

The OCC evaluated the disparity between the median family incomes within the AA and the cost of housing. Based on the FFIEC, the AMFI is \$71,900 in the AA. The annual maximum low-income and maximum moderate-income calculations are based on 50 percent and 80 percent of the FFIEC AMFI for the AA. Additionally, low-income families earned less than \$35,950 and moderate-income families earned at least \$35,950 and less than \$57,520 in the AA. According to Realtor.com data, the median list price across the AA increased from \$145,000 in January 2021 to \$159,900 in December 2023, reflecting a 10.3 percent increase.

One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$899 for a low-income borrower and \$1,438 for a moderate-income borrower. Assuming a 30-year mortgage with a 6 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA's median list price would be \$858. This demonstrates that LMI borrowers would not be challenged to afford a home mortgage loan in this AA.

### **Community Contact**

As part of this evaluation, the OCC reviewed information from three community contact interviews conducted during the evaluation period. The community contacts consist of representatives from an economic development organization focused on community growth and support in the AA, a nonprofit organization promoting transportation, infrastructure, and community planning, and a county official who manages budget and policies primarily serving LMI individuals through tax revenue.

The contacts identified the following needs within the community:

- Employment opportunities, particularly for young professionals and recent graduates.
- Affordable housing, including single family and multifamily units for rent.
- Mortgage financing and consumer loans, especially auto loans.
- Access to capital, specifically for small business micro loans.
- Community centers, recreational facilities, and improved water and sewer systems.

The following tables provide a summary of the demographics, including housing and business information for the Charleston CSA for each evaluation period.

Assessment Area(s) - Charleston CSA						2021
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	170	4.71	21.18	52.94	20.59	0.59
Population by Geography	644,204	3.01	15.04	58.98	22.53	0.44
Housing Units by Geography	298,240	3.71	15.92	58.16	22.02	0.20
Owner-Occupied Housing by Geography	187,605	1.67	13.76	60.13	24.43	0.01
Occupied Rental Units by Geography	72,753	7.78	19.02	53.14	19.38	0.68
Vacant Units by Geography	37,882	5.97	20.65	58.03	15.15	0.20
Businesses by Geography	22,288	5.81	13.15	54.06	26.79	0.20
Farms by Geography	794	2.77	10.33	61.34	25.57	0.00
Family Distribution by Income Level	169,726	22.13	16.99	19.68	41.21	0.00
Household Distribution by Income Level	260,358	25.47	15.75	16.55	42.23	0.00
Unemployment rate (%)	7.72	12.92	11.19	8.05	4.56	14.19
Households Below Poverty Level (%)	17.93	43.57	26.82	16.66	11.05	69.35
Median Family Income (16620 - Charleston, WV MSA)		\$54,658	Median Housing Value			\$93,400
Median Family Income (26580 - Huntington-Ashland, WV-KY-OH MSA)		\$54,584	Median Gross Rent			\$647
Median Family Income (16620 - Charleston, WV MSA) for 2021		\$59,800	Families Below Poverty Level			13.39
Median Family Income (26580 - Huntington-Ashland, WV-KY-OH MSA) for 2021		\$61,000				
FFIEC File - 2010 Census 2021 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

Assessment Area(s) - Charleston CSA						2022-2023
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	188	4.26	20.74	53.72	20.21	1.06
Population by Geography	618,721	2.65	17.17	57.85	21.59	0.73
Housing Units by Geography	299,548	2.74	18.29	57.25	20.85	0.86
Owner-Occupied Housing by Geography	181,235	1.24	15.56	59.03	23.41	0.76
Occupied Rental Units by Geography	70,277	5.48	22.59	53.94	16.94	1.05
Vacant Units by Geography	48,036	4.41	22.34	55.40	16.93	0.92
Businesses by Geography	19,762	4.34	17.58	49.15	28.39	0.53
Farms by Geography	701	1.71	12.84	60.20	24.11	1.14
Family Distribution by Income Level	160,836	22.85	16.29	20.66	40.20	0.00
Household Distribution by Income Level	251,512	26.05	15.11	16.66	42.17	0.00
Unemployment rate (%)	5.67	6.88	8.12	5.63	4.05	7.75
Households Below Poverty Level (%)	18.40	43.29	27.18	17.00	11.30	41.74
Median Family Income (16620 - Charleston, WV MSA)		\$60,682			Median Housing Value	\$111,500
Median Family Income (26580 - Huntington-Ashland, WV-KY-OH MSA)		\$61,976			Median Gross Rent	\$725
Median Family Income (16620 - Charleston, WV MSA) for 2023		\$71,900			Families Below Poverty Level	13.53
Median Family Income (26580 - Huntington-Ashland, WV-KY-OH MSA) for 2023		\$73,700				
FFIEC File - 2020 Census						
2023 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

## Scope of Evaluation in Charleston CSA

The OCC conducted a full-scope review of the Charleston CSA. Home mortgage loans, which account for 83.3 percent of loans originated and purchased in the AA during the evaluation period, were given more weight than small business loans.

Where relevant to conclusions, the OCC considered the performance context previously discussed in the “Description of the Institution”, the “Description of the Institution’s Operations”, and other factors discussed in this section.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CHARLESTON CSA

### LENDING TEST

The bank’s performance under the Lending Test in the Charleston CSA is rated High Satisfactory.

## Conclusions for Area Receiving a Full-Scope Review

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

### Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Table 3: Lending Activity								2021-2023	
Number of Loans									
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits	
Charleston CSA	3,890	780	0	14	0	4,684	100.00	100.00	
Dollar Volume of Loans (\$000s)									
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits	
Charleston CSA	448,557	93,727	0	19,013	0	561,297	100.00	100.00	
<i>Source: 1/1/2021 - 12/31/2023 Bank Data.</i>									
<i>Due to rounding, totals may not equal 100.0%</i>									

Based on 2023 peer mortgage data, CNB ranked second with an 11.2 percent market share. This rank placed the bank in the top one percent of all mortgage lenders. Competition for mortgage loans was very strong, as there were 351 other lenders in the AA. Vanderbilt Mortgage and Finance ranked first with 11.5 percent market share, Rocket Mortgage ranked third with 4 percent market share, Huntington National Bank ranked fourth with 3.4 percent market share, and Truist Bank ranked fifth with 2.9 percent market share. The bank's lending performance, relative to the number of mortgage lenders in the AA, was stronger than the bank's deposit base. The bank was in the top one percent for lending compared to the top 6.9 percent for deposits.

According to 2023 peer small business data, CNB ranked tenth with a 2.1 percent market share. This rank placed the bank in the top 10.6 percent of all small business lenders. Competition was strong with 94 small business lenders in the AA. The top five small business lenders with their respective market share were American Express National Bank with 23.6 percent, JPMorgan Chase Bank, NA with 12.6 percent, Synchrony Bank with 10.6 percent, Capital One, NA with 8.1 percent, and US Bank, NA with 7.6 percent. The bank's lending performance, relative to the number of small business lenders in this AA was lower than the bank's deposit base. The bank was in the top 10.6 percent for lending compared to the top 6.9 percent for deposits.

### Distribution of Loans by Income Level of the Geography

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

#### *Home Mortgage Loans*

Refer to Table 7 in the Charleston 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.

Based on the data in the tables and considering the performance context discussed below, the overall geographic distribution of home mortgage loans was adequate.

2021

There were only 1.7 percent of owner-occupied housing units in low-income geographies. Given the limited lending opportunities in low-income geographies, more emphasis was placed on the bank's lending in moderate-income geographies.

The geographic distribution of home mortgage loans was good. The geographic distribution of home loans in low-income CTs was below the percentage of owner-occupied housing units and was near to the aggregate percentage of all reporting lenders in the AA. The geographic distribution of home mortgage loans in moderate-income CTs was below the percentage of owner-occupied housing units but exceeded the aggregate percentage of all reporting lenders in the AA.

2022-2023

There were only 1.2 percent of owner-occupied housing units in low-income geographies. Given the limited lending opportunities in low-income geographies, more emphasis was placed on the bank's lending in moderate-income geographies.

The geographic distribution of home mortgage loans was adequate. The geographic distribution of home mortgage loans in low-income CTs was significantly below the percentage of owner-occupied housing units and was well below the aggregate percentage of all reporting lenders in the AA. The geographic distribution of home mortgage loans in moderate-income CTs was well below the percentage of owner-occupied housing units and well below the aggregate percentage of all reporting lenders in the AA.

### ***Small Loans to Businesses***

Refer to Table 9 in the Charleston 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.

Based on the data in the tables and considering the performance context discussed below, the overall geographic distribution of small loans to businesses was good.

2021

There were only 1,295 small businesses in low-income geographies, which constrained the ability of the bank to make small business loans in those geographies. Given the limited lending opportunities in low-income geographies, more emphasis was placed on the bank's lending in moderate-income geographies.

The geographic distribution of small loans to businesses was good. The geographic distribution of small loans to businesses in low-income CTs was well below the proportion of businesses in low-income CTs and well below the aggregate percentage of all reporting lenders in the AA. The geographic distribution of small loans to businesses in moderate-income CTs was near to the proportion of businesses in moderate-income CTs and exceeded the aggregate percentage of all reporting lenders in the AA.

2022-2023

There were only 858 small businesses in low-income geographies, which constrained the ability of the bank to make small business loans in those geographies. Given the limited lending opportunities in low-income geographies, more emphasis was placed on the bank's lending in moderate-income geographies.

The geographic distribution of small loans to businesses was good. The geographic distribution of small loans to businesses in low-income CTs was below the proportion of businesses in low-income CTs and was near to the aggregate percentage of all reporting lenders in the AA. The geographic distribution of small loans to businesses in moderate-income CTs was below the proportion of businesses in moderate-income CTs and was near to the aggregate percentage of all reporting lenders in the AA.

### ***Lending Gap Analysis***

The OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of CNB's home mortgage loans and small loans to businesses during the evaluation period. The analysis did not identify any unexplained, conspicuous gaps.

### **Distribution of Loans by Income Level of the Borrower**

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

### ***Home Mortgage Loans***

Refer to Table 8 in the Charleston CSA 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.

Based on the data in the tables and considering the performance context discussed below, the overall borrower distribution of home mortgage loans was good.

The significant competition from other lenders, housing affordability, the limited availability of housing that LMI borrowers can afford to acquire, and poverty levels within the AA constrained the lending opportunities to low-income borrowers.

2021

The borrower distribution of home mortgage loans was good. The percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families and below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers was near to the percentage of moderate-income families and exceeded the aggregate percentage of all reporting lenders.

2022-2023

The borrower distribution of home mortgage loans was good. The percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families and below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income

borrowers exceeded the percentage of moderate-income families and was near to the aggregate percentage of all reporting lenders.

### ***Small Loans to Businesses***

Refer to Table 10 in the Charleston CSA 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.

Based on the data in the tables, the overall borrower distribution of small loans to businesses was good.

2021

The borrower distribution of small loans to businesses was excellent. The percentage of small loans to businesses with gross annual revenues of \$1 million or less exceeded the percentage of those businesses and exceeded the aggregate percentage of all reporting lenders.

2022-2023

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

### **Community Development Lending**

The bank has made a relatively high level of CD loans. CD lending had a positive effect on the Lending Test conclusion.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

During the evaluation period, CNB originated 14 CD loans totaling \$19.0 million in the AA. The volume of CD loans represented 3.5 percent of allocated tier one capital. CD loans were responsive to community needs as they provided financing for small businesses and to organizations that provide services to LMI individuals through various programs.

The following are examples of CD loans the bank originated or purchased in the CSA:

- A \$12.4 million loan to an organization that operates a 184-bed skilled nursing home facility in the AA. The facility provided resident nursing and medical care and affordable housing needs to LMI individuals. A large majority of residents are supported by Medicaid assistance, a welfare program jointly funded by the federal government and administered at the state level that provides health care for low-income individuals.
- A \$2.0 million PPP loan for working capital to support operations of a business located in a distressed geography due to high unemployment.
- A \$1.0 million working capital line of credit to support the operations of an organization that provided early childhood training and childcare programs to LMI families.

## Product Innovation and Flexibility

The bank made limited use of innovative and/or flexible lending practices in order to serve AA credit needs. These programs were considered in the overall performance and are described in the Description of Institution section of the PE.

## INVESTMENT TEST

The bank's performance under the Investment Test in Charleston CSA is rated Low Satisfactory.

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

The bank had an adequate level of qualified investments, including grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibited adequate responsiveness to credit and community development needs. The bank rarely used innovative and/or complex investments to support CD initiatives.

## Number and Amount of Qualified Investments

CNB made 209 qualified CD investments and grants totaling \$13.5 million, which is equivalent to 5.7 percent of allocated tier 1 capital. The bank made four current period CD investments which totaled \$10.5 million and 196 qualified grants totaling \$356,919. The current period investments consisted of \$10.5 million in Low-Income Housing Tax Credits (LIHTCs). Additionally, the AA benefitted from the ongoing impact of nine prior period CD investments with an outstanding balance of \$2.6 million. The bank had four unfunded commitments totaling \$2.9 million. The bank's CD investments were responsive to affordable housing and community services to LMI individuals in the AA.

Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Charleston CSA	9	2,630	200	10,875	209	99.5	13,505	95.5	4	2,917
Broader Statewide or Regional Area	0	0	1	636	1	0.5	636	4.5	1	203
<b>Total</b>	<b>9</b>	<b>2,630</b>	<b>201</b>	<b>11,510</b>	<b>210</b>	<b>100.0</b>	<b>14,140</b>	<b>100.0</b>	<b>5</b>	<b>3,121</b>

During the evaluation period, the bank provided in-kind office space totally \$14,400 to a nonprofit foundation which issues grants to support the most critical needs projects and programs in the AA. The in-kind office spaces reduce operating costs which frees up financial resources that can be redirected toward programs, allowing for a greater impact.

The following are examples of qualified investments in the CSA:

- \$131,964 in various grants awarded to three regional affiliates of a nationwide organization. These affiliates collaborate with partner agencies and community organizations to improve the lives of individuals, neighborhoods, schools, and workplaces, primarily in LMI areas. A large majority of these grants are part of a match program provided by the bank.

- \$21,440 in grants to a nonprofit organization to distribute emergency food through various partners. The funds support several programs including soup kitchens, neighborhood centers, family crisis centers, and homeless shelters for LMI individuals and families.
- An \$11,000 grant to a nonprofit organization to support various socioeconomic programs and services and provide resources and support to LMI individuals and underserved communities.

## **SERVICE TEST**

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

### **Conclusions for Area Receiving a Full-Scope Review**

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

### **Retail Banking Services**

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

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

Services, including where appropriate, business hours did not vary in a way that inconvenienced the various portions of its AA, particularly LMI geographies and/or individuals. The bank maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. The bank had several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The OCC did not place significant emphasis on these alternative delivery systems, as the bank did not maintain metrics to demonstrate how effectively these channels helped meet the credit needs of low- and moderate-income individuals.

CNB operated 36 branches in the AA, with two located in a low-income geography and eight located in a moderate-income geography. The bank's distribution of branches in LMI geographies exceeded the percentage of the population living within those geographies.

Table 5: Distribution of Branch Delivery Systems													2023
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
Charleston CSA	100.00	36	100.00	5.56	22.22	44.44	27.78	0.00	2.65	17.17	57.85	21.59	0.73
<b>Total</b>	<b>100.00</b>	<b>36</b>	<b>100.00</b>	<b>5.56</b>	<b>22.22</b>	<b>44.44</b>	<b>27.78</b>	<b>0.00</b>	<b>2.65</b>	<b>17.17</b>	<b>57.85</b>	<b>21.59</b>	<b>0.73</b>

Source: FFIEC File - 2020 Census  
1/1/2022 - 12/31/2023 Bank Data  
Due to rounding, totals may not equal 100.0%

## Community Development Services

The bank was a leader in providing CD services.

CD services were effective and responsive in helping the bank address community needs, consistent with its capacity and expertise to conduct specific activities.

During the evaluation period, 68 bank employees from various lines of businesses collectively provided a total of 3,781 hours in support of 75 organizations. This total includes the efforts of bank employees who spent over 3,689 hours serving on boards and committees for 50 different organizations. Within these totals, bank employees conducted financial education events, contributing 91 hours in coordination with 28 different schools and organizations.

The following are examples of qualified activities in the CSA:

- Two bank employees served 294 hours as board members and treasurer to a five-county development entity with a purpose to promote, develop and protect the economy, health, education and general welfare of the community. The development entity creates opportunities by approving low interest, long-term fixed rate loans to businesses that create jobs.
- Three bank employees served 122 hours as board members to a nonprofit organization which helps to promote business growth within the community.
- An employee contributed 16 hours of technical service in support of the Federal Home Loan Bank's Home4Good initiative which helps those who are homeless or at risk of homelessness by channeling dollars to local service organizations that have programs and additional resources.

## Combined Statistical Area Rating

### Washington-Baltimore-Arlington, DC-MD-WV-PA Combined Statistical Area (Washington CSA)

**CRA rating for the Washington CSA<sup>2</sup>:** Satisfactory

**The Lending Test is rated:** High Satisfactory

**The Investment Test is rated:** High Satisfactory

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflected good responsiveness to the credit needs in the AA.
- The geographic distribution of loans was excellent.
- The distribution of home mortgage loans to individuals of different income levels and small businesses of different sizes was good.
- The bank had a significant level of qualified investments and grants.
- 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.

### Description of Institution's Operations in Washington CSA

The Washington CSA is comprised of portions of the Hagerstown-Martinsburg MSA, the Washington-Arlington-Alexandria MMSA, and the Winchester MSA. The Hagerstown-Martinsburg MSA consists of the counties of Berkeley and Morgan in West Virginia. The Washington-Arlington-Alexandria MSA consists of the counties of Jefferson in West Virginia and Warren in Virginia. The Winchester MSA consists of the county of Frederick and the city of Winchester, in Virginia. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies. Refer to Appendix A for a listing of all the bank's AAs.

Based on the FDIC Summary of Deposit Market Share Report as of June 30, 2023, the bank ranked sixth out of 18 FDIC-insured institutions with a 6 percent deposit market share. Bank deposits within in the AA accounted for 9.3 percent of its total deposits. Strong competition for financial services existed within the

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<sup>2</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

bank's AA, which includes nationwide and regional institutions. The top three competitors and their respective deposit market share included Truist Bank, at 28.9 percent with 12 offices, United Bank, at 13.5 percent with 14 offices, and Bank Of Clarke, at 9 percent with seven offices in the AA.

CNB provided a full range of loan and deposit products and services in the AAs. The bank operated 10 full-service branches in the rating area. All branches in the AA had an on-site ATM with cash dispensing capabilities. The branches represented 10.2 percent of the bank's total branch network.

The following tables provide a summary of the demographics, including housing and business information for the Washington CSA for each evaluation period.

Assessment Area(s) - Washington CSA						2021
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
<b>Geographies (Census Tracts)</b>	60	5.00	35.00	50.00	10.00	0.00
<b>Population by Geography</b>	328,402	2.95	28.20	56.96	11.90	0.00
<b>Housing Units by Geography</b>	138,254	3.16	29.00	56.59	11.25	0.00
<b>Owner-Occupied Housing by Geography</b>	89,025	2.63	24.40	59.73	13.24	0.00
<b>Occupied Rental Units by Geography</b>	34,072	4.56	37.90	49.85	7.69	0.00
<b>Vacant Units by Geography</b>	15,157	3.11	36.02	53.28	7.59	0.00
<b>Businesses by Geography</b>	14,953	3.60	29.37	54.00	13.03	0.00
<b>Farms by Geography</b>	957	3.66	25.71	58.93	11.70	0.00
<b>Family Distribution by Income Level</b>	85,032	24.20	18.86	21.28	35.66	0.00
<b>Household Distribution by Income Level</b>	123,097	25.20	17.36	18.65	38.79	0.00
<b>Unemployment rate (%)</b>	7.92	8.60	9.45	7.88	4.59	0.00
<b>Households Below Poverty Level (%)</b>	10.56	18.25	14.61	9.10	5.84	0.00
<b>Median Family Income (25180 - Hagerstown-Martinsburg, MD-WV MSA)</b>		\$64,343	<b>Median Housing Value</b>			\$196,300
<b>Median Family Income (47894 - Washington-Arlington-Alexandria, DC-VA-MD-WV MD)</b>		\$106,105	<b>Median Gross Rent</b>			\$915
<b>Median Family Income (49020 - Winchester, VA-WV MSA)</b>		\$69,817	<b>Families Below Poverty Level</b>			7.98
<b>Median Family Income (25180 - Hagerstown-Martinsburg, MD-WV MSA) for 2021</b>		\$74,400				
<b>Median Family Income (47894 - Washington-Arlington-Alexandria, DC-VA-MD-WV MD) for 2021</b>		\$122,100				
<b>Median Family Income (49020 - Winchester, VA-WV MSA) for 2021</b>		\$81,400				
FFIEC File - 2010 Census						
2021 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Assessment Area(s) - Washington CSA						2022-2023
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	81	4.94	28.40	50.62	16.05	0.00
Population by Geography	357,106	4.66	27.22	51.82	16.30	0.00
Housing Units by Geography	146,139	5.18	28.53	51.14	15.15	0.00
Owner-Occupied Housing by Geography	97,535	2.97	26.63	53.66	16.75	0.00
Occupied Rental Units by Geography	34,013	10.83	31.86	45.71	11.59	0.00
Vacant Units by Geography	14,591	6.79	33.53	46.94	12.73	0.00
Businesses by Geography	13,166	7.63	25.75	50.03	16.60	0.00
Farms by Geography	807	3.10	24.29	57.25	15.37	0.00
Family Distribution by Income Level	89,014	22.49	19.63	23.41	34.48	0.00
Household Distribution by Income Level	131,548	23.70	17.75	21.09	37.46	0.00
Unemployment rate (%)	5.18	5.71	7.26	4.57	3.39	0.00
Households Below Poverty Level (%)	8.98	19.57	13.00	7.13	4.46	0.00
Median Family Income (25180 - Hagerstown-Martinsburg, MD-WV MSA)	\$77,963	Median Housing Value				\$225,600
Median Family Income (47894 - Washington-Arlington-Alexandria, DC-VA-MD-WV MD)	\$126,224	Median Gross Rent				\$1,092
Median Family Income (49020 - Winchester, VA-WV MSA)	\$83,355	Families Below Poverty Level				6.51
Median Family Income (25180 - Hagerstown-Martinsburg, MD-WV MSA) for 2023	\$90,700					
Median Family Income (47894 - Washington-Arlington-Alexandria, DC-VA-MD-WV MD) for 2023	\$150,100					
Median Family Income (49020 - Winchester, VA-WV MSA) for 2023	\$99,900					
FFIEC File - 2020 Census						
2023 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

## Economic Conditions

According to Moody's Analytics, the Washington CSA economy is facing challenges, with payroll employment growth trailing behind national figures. Federal government payrolls remained stable, although professional and business services have plateaued, while healthcare saw progress. House prices are increasing faster than the national average, despite sluggish residential construction.

Consumer industries will face challenges as reduced disposable income from fewer high-paid federal jobs leads to decreased spending, particularly affecting retail, leisure, hospitality, and personal services.

## Employment

According to Moody's Analytics, top employers in the AA include the Federal Government, Inova Health System, MedStar Health, Marriott International Inc., Booz Allen Hamilton, and the University of Maryland.

According to the BLS, the unemployment rate declined throughout the evaluation period in the AA. In January 2021, the rate was 5.8 percent compared to 2.4 percent in December 2023. The national unemployment rate was 6.4 percent in January 2021 and 3.8 percent in December 2023.

## **Housing**

The OCC evaluated the disparity between the median family incomes within the AA and the cost of housing. Based on the FFIEC, the AMFI is \$151,400 in the AA. The annual maximum low-income and maximum moderate-income calculations are based on 50 percent and 80 percent of the FFIEC AMFI for the AA. Additionally, low-income families earned less than \$75,700 and moderate-income families earned at least \$75,700 and less than \$121,120 in the AA. According to Realtor.com data, the median list price across the AA increased from \$489,000 in January 2021 to \$585,000 in December 2023, reflecting a 19.6 percent increase.

One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$1,893 for a low-income borrower and \$3,028 for a moderate-income borrower. Assuming a 30-year mortgage with a 6 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA's median list price would be \$3,140. This demonstrates that LMI borrowers would be challenged to afford a home mortgage loan in this AA.

## **Community Contact**

As part of this evaluation, the OCC reviewed information from two community contact interviews and a community listening session conducted during the evaluation period. The community contacts consisted of representatives from a nonprofit real estate developer addressing affordable housing in the region, an organization which tackles systemic economic inequality to create programs that promote financial equitable access to capital, and a group of various nonprofits brought together for a listening session.

The Washington, DC area faces significant socio-economic challenges, with a pressing need for affordable housing, support for small businesses, youth opportunities, mental health resources, financial literacy, education, and nonprofit sustainability. Here are the identified community needs:

- Affordable housing, including both single family and multifamily units for rent.
- Access to capital, financial and digital literacy training, and better networking opportunities for small business owners to ensure growth and sustainability.
- Youth programs for high school-aged youth, such as sports, internships, and mentorship programs to develop their leadership skills and career readiness.
- Workforce development approach involving skill-building, financial education, and better support services like transportation and childcare.
- Financial education programs that assist consumers with building and maintaining savings, student loan counseling, debt management counseling, and second chance checking accounts.
- Increased capacity, staff development, and access to unrestricted funding are critical for nonprofits to effectively contribute to community growth and stability.

## Scope of Evaluation in Washington CSA

The OCC conducted a full-scope review of the Washington CSA. Home mortgage loans, which accounted for 89.4 percent of loans originated and purchased in the AA during the evaluation period, were given more weight than small business loans. The bank originated four small farm loans during the evaluation period, which is insufficient to conduct a meaningful analysis.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WASHINGTON CSA

### LENDING TEST

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

### Conclusions for Area Receiving a Full-Scope Review

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

### Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Table 3: Lending Activity								2021-2023	
Number of Loans									
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits	
Washington CSA	1,416	164	4	9	0	1,584	100.00	100.00	
Dollar Volume of Loans (\$000s)									
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits	
Washington CSA	207,448	15,192	165	18,690	0	241,495	100.00	100.00	
<i>Source: 1/1/2021 - 12/31/2023 Bank Data.</i>									
<i>Due to rounding, totals may not equal 100.0%</i>									

Based on 2023 peer mortgage data, CNB ranked fifth out of 448 lenders with a 4.2 percent market share. This rank placed the bank in the top one percent of all mortgage lenders. The other four top home mortgage lenders and their respective market share were Pennymac Loan Services LLC., with 5.6 percent, Truist Bank with 5.2 percent, Navy Federal Credit Union with 5.1 percent, and Rocket Mortgage with 4.6 percent. The bank's lending performance, relative to the number of mortgage lenders in this AA, was stronger than the bank's deposit base. The bank was in the top one percent for lending compared to the top 33.3 percent for deposits.

According to 2023 peer small business data, CNB ranked 19th out of 89 small business lenders with a 0.66 percent market share. The top five small business lenders with their respective market share were American Express National Bank with 29.4 percent, JPMorgan Chase Bank, NA with 12.1 percent, Capital One, NA with 9.2 percent, Synchrony Bank with 8.3 percent, and Citibank, NA with 7 percent. The bank's lending performance, relative to the number of lenders in this AA, was stronger than the bank's deposit base. The bank was in the top 21.3 percent for small business lending compared to the top 33.3 percent for deposits.

### **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 7 in the Washington 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.

Based on the data in the tables, the overall geographic distribution of home mortgage loans was excellent.

2021

The geographic distribution of home mortgage loans was excellent. The geographic distribution of home loans in low-income CTs exceeded the percentage of owner-occupied housing units and exceeded the aggregate percentage of all reporting lenders in the AA. The geographic distribution of home mortgage loans in moderate-income CTs was near to the percentage of owner-occupied housing units and exceeded the aggregate percentage of all reporting lenders in the AA.

2022-2023

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#### ***Small Loans to Businesses***

Refer to Table 9 in the Washington 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.

Based on the data in the tables, the geographic distribution of small loans to businesses of different sizes was good.

2021

The geographic distribution of small loans to businesses was excellent. The geographic distribution of small loans to businesses in low-income CTs exceeded the proportion of businesses in low-income CTs

and exceeded the aggregate percentage of all reporting lenders in the AA. The geographic distribution of small loans to businesses in moderate-income CTs exceeded the proportion of businesses in moderate-income CTs and exceeded the aggregate percentage of all reporting lenders in the AA.

2022-2023

The geographic distribution of small loans to businesses was good. The geographic distribution of small loans to businesses in low-income CTs exceeded the proportion of businesses in low-income CTs and exceeded the aggregate percentage of all reporting lenders in the AA. The geographic distribution of small loans to businesses in moderate-income CTs was below the proportion of businesses in moderate-income CTs and was below the aggregate percentage of all reporting lenders in the AA.

### ***Lending Gap Analysis***

The OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of CNB's home mortgage loans and small loans to businesses during the evaluation period. The analysis did not identify any unexplained, conspicuous gaps.

### **Distribution of Loans by Income Level of the Borrower**

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

### ***Home Mortgage Loans***

Refer to Table 8 in the Washington CSA 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.

Based on the data in the tables, the overall borrower distribution of home mortgage loans was good.

2021

The borrower distribution of home mortgage loans was good. The percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but near to the aggregate percentage of all reporting lenders in the AA. The percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and exceeded the aggregate percentage of all reporting lenders in the AA.

2022-2023

The borrower distribution of home mortgage loans was good. The percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but exceeded the aggregate percentage of all reporting lenders in the AA. The percentage of home mortgage loans to moderate-income borrowers was near to the percentage of moderate-income families and was near to the aggregate percentage of all reporting lenders in the AA.

***Small Loans to Businesses***

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Based on the data in the tables, the overall borrower distribution of small loans to businesses was excellent.

2021

The borrower distribution of small loans to businesses was excellent. The percentage of small loans to businesses with gross annual revenues of \$1 million or less exceeded the percentage of those businesses and exceeded the aggregate percentage of all reporting lenders in the AA.

2022-2023

The borrower distribution of small loans to businesses was excellent. The percentage of small loans to businesses with gross annual revenues of \$1 million or less exceeded the percentage of those businesses and exceeded the aggregate percentage of all reporting lenders in the AA.

**Community Development Lending**

The bank made a relatively high level of CD loans. CD lending had a positive effect on the Lending Test conclusion.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

During the evaluation period, CNB originated nine CD loans totaling \$18.7 million in the AA. The volume of CD loans represented 3.4 percent of allocated tier one capital. CD loans were responsive to community needs as they provided financings for small businesses and to organizations that provide services to low-income individuals through various programs. Other CD loans supported infrastructure benefiting moderate-income CTs.

The following are examples of CD loans the bank originated or purchased in the CSA:

- A \$9.6 million loan to fund renovations and improvements to revitalize and stabilize business property in a moderate-income geography in the AA. This redevelopment was a positive contribution to the AA's economic growth.
- An \$8.3 million loan to a 120-bed skilled nursing facility in the AA. A large majority of residents are supported by Medicaid assistance, a welfare program jointly funded by the federal government and administered at the state level that provides health care for low-income individuals.
- A loan for \$335,000 to purchase new fire rescue equipment and facilities for a volunteer fire department serving a LMI community.

## Product Innovation and Flexibility

The bank made limited use of innovative and/or flexible lending practices in order to serve AA credit needs. The flexible programs were considered in the overall performance and are described in the Description of Institution section.

## INVESTMENT TEST

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

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

The bank had a significant level of qualified investments, including grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibited good responsiveness to credit and community development needs. The bank occasionally used innovative and/or complex investments to support CD initiatives.

## Number and Amount of Qualified Investments

Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Washington CSA	8	6,242	92	665	100	100.00	6,907	100.00	1	10
<b>Total</b>	<b>8</b>	<b>6,242</b>	<b>92</b>	<b>665</b>	<b>100</b>	<b>100.00</b>	<b>6,907</b>	<b>100.00</b>	<b>1</b>	<b>10</b>

CNB made 100 qualified CD investments and grants totaling \$6.9 million, which is equivalent to 13.5 percent of allocated tier 1 capital. The bank made one current period CD investment, a municipal bond, which totaled \$564,671 and 91 qualified grants totaling \$100,432. Additionally, the AA benefitted from the ongoing impact of eight prior period CD investments with an outstanding balance of \$6.2 million. The bank had an unfunded commitment totaling \$10,329. The bank's CD investments were responsive to affordable housing needs and community services to LMI individuals in the AA.

In 2021, the bank provided in-kind office space totaling \$1,600 to a nonprofit organization that helps provide mentors to at-risk children who are living in low income, single parent homes. The nonprofit's programs reached disadvantaged youth with professional support and mentoring programs. The in-kind office spaces reduced operating costs which freed up financial resources that could be redirected toward programs, allowing for a greater impact.

The following are examples of qualified investments in the CSA:

- \$40,231 in various grants awarded to two regional affiliates of a nationwide organization. These affiliates collaborate with partner agencies and community organizations to improve the lives of individuals, neighborhoods, schools, and workplaces, primarily in LMI areas. A large majority of these grants are part of a match program provided by the bank.

- \$3,896 in grants to a nonprofit organization with a mission to support LMI adults with disabilities and individuals encountering barriers to employment, to develop skills and find stable, rewarding jobs.
- \$2,500 to a nonprofit organization which supports home repairs and affordable housing, and advocates for policies that make constructing and accessing housing easier for LMI individuals and families.

## SERVICE TEST

The bank’s performance under the Service Test in Washington CSA is rated Outstanding.

### Conclusions for Area Receiving a Full-Scope Review

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

### Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank’s AA.

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 CSA	100.00	10	100.00	10.00	40.00	50.00	0.00	0.00	4.66	27.22	51.82	16.30	0.00
<b>Total</b>	<b>100.00</b>	<b>10</b>	<b>100.00</b>	<b>10.00</b>	<b>40.00</b>	<b>50.00</b>	<b>0.00</b>	<b>0.00</b>	<b>4.66</b>	<b>27.22</b>	<b>51.82</b>	<b>16.30</b>	<b>0.00</b>

*Source: FFIEC File - 2020 Census  
1/1/2022 - 12/31/2023 Bank Data  
Due to rounding, totals may not equal 100.0%*

Assessment Area	Branch Openings/Closings		Net change in Location of Branches (+ or -)				
	# of Branch Openings	# of Branch Closings					
			Low	Mod	Mid	Upp	NA
Washington CSA	1	1	0	-1	+1	0	0
<b>Total</b>	<b>1</b>	<b>1</b>	<b>0</b>	<b>-1</b>	<b>+1</b>	<b>0</b>	<b>0</b>

*1/1/2023 - 12/31/2023 Bank Data.*

The bank opened one branch and closed one branch during the evaluation period. The institution’s opening and closing of branches did not adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.

CNB had 10 branches in the AA, with one located in a low-income geography and four located in a moderate-income geography. The bank's distribution of branches in LMI geographies exceeded the percentage of the population living within those geographies.

Services, including where appropriate, business hours did not vary in a way that inconvenienced the various portions of its AA, particularly LMI geographies and/or individuals. The bank maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. The bank had several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The OCC did not place significant emphasis on these alternative delivery systems, as the bank did not maintain metrics to demonstrate how effectively these channels helped meet the credit needs of low- and moderate-income individuals.

### **Community Development Services**

The bank was a leader in providing CD services.

CD services were effective and responsive in helping the bank address community needs, consistent with its capacity and expertise to conduct specific activities.

During the evaluation period, 20 bank employees from various lines of business collectively provided a total of 1,310 hours in support of 24 organizations. This total includes the efforts of bank employees who spent over 1,091 hours serving on boards and committees for 13 different organizations. Within these totals, bank employees conducted financial education events, contributing 219 hours in coordination with 13 different schools and organizations.

The following are examples of qualified activities in the CSA:

- Two bank employees served 342 hours as board members to a nonprofit organization which invests in programs and services that build stronger, healthier and more financially stable individuals and families. The nonprofit partners with corporations, area businesses, community leaders, volunteers and donors to provide support within the AA. As noted in the Investment Test section for the AA, the bank also provided a grant to the organization.
- An employee served 168 hours as a member of an advisory board to an adult drug court program. The program aims to reduce recidivism and substance abuse among offenders, particularly focusing on LMI individuals, and to increase the likelihood of successful rehabilitation through early, continuous, and intensive treatment.
- An employee served 84 hours as board member and treasurer to an organization which promotes tourism, small business, and commerce in a historical area revitalizing the downtown commercial district through historic preservation.

## State Rating

### State of Kentucky

**CRA rating for the State of Kentucky<sup>3</sup>:** Satisfactory

**The Lending Test is rated:** High Satisfactory

**The Investment Test is rated:** Low Satisfactory

**The Service Test is rated:** High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to the credit needs in the AAs.
- The bank exhibited an excellent geographic distribution of loans in the AAs.
- The distribution of home mortgage loans to individuals of different income levels and small businesses of different sizes was good.
- The bank made a relatively high level of CD loans.
- The bank had an adequate level of qualified investments and grants when considering the performance in the limited-scope review, which had a positive impact.
- 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.

### Description of Institution's Operations in Kentucky

CNB has two AAs within the state of Kentucky. These AAs include the Kentucky Non-MSA (KY Non-MSA) and Lexington MSA. The KY Non-MSA includes the counties of Franklin, Harrison, Johnson, Lawrence, Montgomery, and Nicholas. The Lexington MSA consists of the counties of Fayette, Jessamine, and Woodford. Due to an acquisition in 2023, the bank added the counties of Franklin to the KY Non-MSA and Woodford to the Lexington MSA. The AAs meet the requirements of the regulation and do not arbitrarily exclude LMI geographies. Refer to Appendix A for a listing of all the bank's AAs.

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<sup>3</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

## Kentucky Non-MSA

Based on the FDIC Summary of Deposit Market Share Report as of June 30, 2023, the bank ranked third out of 20 FDIC-insured financial institutions in the KY Non-MSA with an 11.7 percent deposit market share. Strong competition for financial services existed within the bank's AA, which included nationwide and regional institutions. The top three competitors and their respective deposit market share include Traditional Bank, Inc., ranked first with 17.2 percent and six branches, WesBanco Bank, Inc., ranked second with 12.9 percent and four branches, and Citizens Bank of Kentucky, Inc. with 10.4 percent and three branches.

CNB provided a full range of loan and deposit products and services in the AAs. The bank operated 7 full-service branches in the rating area. All branches in the AA had an on-site ATM with cash dispensing capabilities. The branches represent 7.14 percent of the bank's total branch network.

## Demographic Data

The following tables provide a summary of the demographics that include housing, business, and farm information for the KY Non-MSA.

Assessment Area(s) - KY Non-MSA						2021
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	24	0.00	0.00	91.67	8.33	0.00
Population by Geography	92,061	0.00	0.00	87.97	12.03	0.00
Housing Units by Geography	41,022	0.00	0.00	88.87	11.13	0.00
Owner-Occupied Housing by Geography	24,894	0.00	0.00	90.31	9.69	0.00
Occupied Rental Units by Geography	10,366	0.00	0.00	82.66	17.34	0.00
Vacant Units by Geography	5,762	0.00	0.00	93.80	6.20	0.00
Businesses by Geography	2,922	0.00	0.00	86.93	13.07	0.00
Farms by Geography	244	0.00	0.00	88.93	11.07	0.00
Family Distribution by Income Level	24,208	24.36	16.14	17.94	41.56	0.00
Household Distribution by Income Level	35,260	26.75	14.72	15.75	42.79	0.00
Unemployment rate (%)	8.99	0.00	0.00	9.35	6.67	0.00
Households Below Poverty Level (%)	24.25	0.00	0.00	24.38	23.29	0.00
Median Family Income (Non-MSAs - KY)		\$45,986		Median Housing Value		\$91,450
Median Family Income (Non-MSAs - KY) for 2021		\$52,600		Median Gross Rent		\$622
				Families Below Poverty Level		19.00
FFIEC File - 2010 Census						
2021 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Assessment Area(s) - KY non-MSA						2022
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	27	0.00	22.22	59.26	18.52	0.00
Population by Geography	93,316	0.00	17.93	63.44	18.62	0.00
Housing Units by Geography	41,774	0.00	18.39	62.67	18.94	0.00
Owner-Occupied Housing by Geography	24,599	0.00	16.63	62.64	20.74	0.00
Occupied Rental Units by Geography	10,353	0.00	17.10	65.03	17.87	0.00
Vacant Units by Geography	6,822	0.00	26.71	59.19	14.10	0.00
Businesses by Geography	1,750	0.00	11.66	65.60	22.74	0.00
Farms by Geography	182	0.00	4.40	61.54	34.07	0.00
Family Distribution by Income Level	24,770	23.14	17.29	18.10	41.48	0.00
Household Distribution by Income Level	34,952	26.00	13.99	16.46	43.55	0.00
Unemployment rate (%)	5.76	0.00	9.20	5.25	5.48	0.00
Households Below Poverty Level (%)	21.31	0.00	32.56	19.19	18.60	0.00
Median Family Income (Non-MSAs - KY)		\$54,327		Median Housing Value		\$119,900
Median Family Income (Non-MSAs - KY) for 2022		\$61,700		Median Gross Rent		\$632
				Families Below Poverty Level		15.61
FFIEC File - 2020 Census 2022 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

Assessment Area(s) - KY Non-MSA						2023
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	47	0.00	17.02	44.68	38.30	0.00
Population by Geography	144,857	0.00	15.00	49.63	35.37	0.00
Housing Units by Geography	65,046	0.00	15.27	49.12	35.61	0.00
Owner-Occupied Housing by Geography	37,869	0.00	13.35	48.76	37.90	0.00
Occupied Rental Units by Geography	18,361	0.00	14.59	47.68	37.73	0.00
Vacant Units by Geography	8,816	0.00	24.93	53.69	21.38	0.00
Businesses by Geography	4,905	0.00	19.96	41.86	38.19	0.00
Farms by Geography	326	0.00	4.91	49.69	45.40	0.00
Family Distribution by Income Level	38,153	19.28	15.54	17.97	47.22	0.00
Household Distribution by Income Level	56,230	21.47	13.38	16.36	48.78	0.00
Unemployment rate (%)	5.38	0.00	9.77	4.94	4.77	0.00
Households Below Poverty Level (%)	17.29	0.00	31.33	18.19	11.03	0.00
Median Family Income (Non-MSAs - KY)		\$54,327		Median Housing Value		\$137,200
Median Family Income (Non-MSAs - KY) for 2023		\$64,900		Median Gross Rent		\$692
				Families Below Poverty Level		13.43
FFIEC File - 2020 Census						
2023 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

During the evaluation period, the bank had six distressed and/or eight underserved nonmetropolitan middle-income geographies in the AA.

### Economic Conditions

According to Moody's Analytics, the state of Kentucky's economy is cooling more rapidly than the broader South. While manufacturing and construction sectors are driving employment, healthcare provides steady support. In contrast, logistics is losing jobs. House prices in Kentucky are rising more swiftly than the national average.

Manufacturing faces challenges from shifting trade policies, particularly affecting transportation equipment sectors with significant reliance on nearby countries. The logistics sector is vital due to external constraints impacting demand for warehousing and delivery services. Population growth remains below average, which leads to missed opportunities for attracting high-wage employment.

### Employment

According to Moody's Analytics, top employers in the state of Kentucky include United Parcel Service, University of Kentucky, Baptist Healthcare Systems Inc., and Norton Healthcare.

According to the BLS, the unemployment rate declined throughout the evaluation period in the AA. In January 2021, the average rate for the counties within the AA was 5.7 percent compared to 5 percent in December 2023. The unemployment rate in the AA was higher than the overall average annual rate for

the state of Kentucky, which was 4.3 percent at the end of the evaluation period. The national unemployment rate was 6.4 percent in January 2021 and 3.8 percent in December 2023.

## **Housing**

The OCC evaluated the disparity between the median family incomes within the AA and the cost of housing. Based on the FFIEC, the AMFI is \$64,900 in the AA. The annual maximum low-income and maximum moderate-income calculations are based on 50 percent and 80 percent of the FFIEC AMFI for the AA. Additionally, low-income families earned less than \$32,450 and moderate-income families earned at least \$32,450 and less than \$51,920 in the AA. According to Realtor.com data, the median list price across the six counties in the AA increased from \$175,883 in January 2021 to \$259,033 in December 2023, reflecting a 47.3 percent increase.

One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$811 for a low-income borrower and \$1,298 for a moderate-income borrower. Assuming a 30-year mortgage with a 6 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA's median list price would be \$1,391. This demonstrates that LMI borrowers would be challenged to afford a home mortgage loan in this AA.

## **Community Contact**

As part of this evaluation, the OCC reviewed information from a community contact interview conducted during the evaluation period. The community contact consists of a representative from an economic development organization and chamber of commerce working in the AA that serves to promote economic growth and create jobs. The contact identified the following needs within the community:

- Affordable housing, including financing for purchases or rehabilitation of single and multifamily homes.
- To grow and attract industries with jobs paying over the median income.
- Investment in public facilities and essential infrastructure.
- Increased engagement from developers and investors is needed for economic development.

## **Scope of Evaluation in Kentucky**

The OCC conducted a full-scope review of the KY Non-MSA and a limited-scope review of the Lexington MSA.

The full-scope AA represented 60.04 percent of the total deposits, 55.9 percent of the loans, and 50.0 percent of the branches in the state of Kentucky. Home mortgage loans, which accounted for 50.4 percent of loans, made in the state's AAs during the evaluation period, were given equal weight as small business loans represented 40.2 percent of total lending in the state. Lesser weight was assigned to small farm loans as small farm loans represented 8.1 percent of the bank's lending in the state.

The KY Non-MSA was impacted by U.S. Census changes, effective January 1, 2022, and AA delineation changes, effective March 10, 2023. The bank added Franklin County, KY to the KY Non-MSA due to the

acquisition of Citizens Commerce Bank in 2023. To account for these changes, all three years' data was analyzed separately with equal weight given to each year.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KENTUCKY

### LENDING TEST

The bank's performance under the Lending Test in the state of Kentucky is rated High Satisfactory.

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the KY Non-MSA was good.

### Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Table 3: Lending Activity							2021-2023	
Number of Loans								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
KY Non-MSA	312	286	84	14	0	696	55.68	60.04
Lexington -MSA	319	216	17	2	0	554	44.32	39.96
<b>Total</b>	<b>631</b>	<b>502</b>	<b>101</b>	<b>16</b>	<b>0</b>	<b>1,250</b>	<b>100.00</b>	<b>100.00</b>
Dollar Volume of Loans (\$000s)								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
KY Non-MSA	36,733	19,111	4,747	19,723	0	80,314	43.10	60.04
Lexington MSA	58,870	42,588	1,938	2,639	0	106,035	56.90	39.96
<b>Total</b>	<b>95,603</b>	<b>61,699</b>	<b>6,685</b>	<b>22,362</b>	<b>0</b>	<b>186,349</b>	<b>100.00</b>	<b>100.00</b>

Source: 1/1/2021 - 12/31/2023 Bank Data.  
Due to rounding, totals may not equal 100.0%

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

Based on 2023 HMDA peer data, CNB ranked sixth out of 246 lenders with a 3.8 percent market share. This rank placed the bank in the top 2.4 percent of mortgage lenders. The top five home mortgage lenders, Vanderbilt Mortgage and Finance, Commonwealth Credit Union, Stockton Mortgage Corporation, Traditional Bank, Inc., and Rocket Mortgage had a combined market share of 29.8 percent. The bank's lending performance, relative to the number of mortgage lenders in this AA, is stronger than the bank's deposit base. The bank was in the top 2.4 percent for lending compared to the top 15 percent for deposits.

Based upon 2023 peer small business loan data, the bank ranked ninth out of 63 lenders, with a 2.1 percent market share. This rank placed the bank in the top 14.3 percent of small business lenders. The top five lenders and their respective market share were, American Express National Bank with 25.2 percent,

Synchrony Bank with 18 percent, JPMorgan Chase Bank, NA with 10 percent, US Bank NA with 7.1 percent, and Capital One NA with 7 percent. The bank's lending performance, relative to the number of small business lenders in this AA, was stronger than the bank's deposit base. The bank was in the top 14.3 percent for lending compared to the top 15 percent for deposits.

Based on 2023 peer small farm data, CNB ranked second out of 18 lenders with a market share of 18.4 percent. This rank placed the bank in the top 11.1 percent of all small farm lenders. The other top five lenders and their respective market share were, John Deer Financial F.S.B., ranked first with 19.6 percent, Traditional Bank, ranked third with 13.5 percent, Community Trust Bank Inc., ranked fourth with 11 percent, and Wells Fargo Bank, NA, ranked fifth with 8 percent. The bank's lending performance, relative to the number of small farm lenders in this AA, was stronger than the bank's deposit base. The bank was in the top 11.1 percent for lending compared to the top 15 percent for deposits.

### **Distribution of Loans by Income Level of the Geography**

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

#### ***Home Mortgage Loans***

Refer to Table 7 in the state of Kentucky section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables, the overall geographic distribution of home mortgage loans was excellent.

2021

The AA did not have low- or moderate- income CTs in this year; therefore, a geographic distribution analysis would not be meaningful.

2022

The geographic distribution of home mortgage loans was excellent. The geographic distribution of home mortgage loans in moderate-income CTs exceeded the percentage of owner-occupied housing units and exceeded the aggregate percentage of all reporting lenders in the AA. There were no low-income CTs in this year.

2023

The geographic distribution of home mortgage loans was excellent. The geographic distribution of home mortgage loans in moderate-income CTs exceeded the percentage of owner-occupied housing units and was below the aggregate percentage of all reporting lenders in the AA. There were no low-income CTs in this year.

***Small Loans to Businesses***

Refer to Table 9 in the state of Kentucky section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables, the overall geographic distribution of small loans to businesses was excellent.

2021

There were no low- or moderate-income CTs in the AA during this year; therefore, a geographic distribution analysis would not be meaningful.

2022

The geographic distribution of small loans to businesses was excellent. The geographic distribution of small loans to businesses in moderate-income CTs exceeded the percentage of businesses and exceeded the aggregate percentage of all reporting lenders in the AA. There were no low-income CTs in this year.

2023

The geographic distribution of small loans to businesses was excellent. The geographic distribution of small loans to businesses in moderate-income CTs exceeded the percentage of businesses and exceeded the aggregate percentage of all reporting lenders in the AA. There were no low-income CTs in this year.

***Small Loans to Farms***

Refer to Table 11 in the state of Kentucky section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables, the overall geographic distribution of small loans to farms was poor.

2021

Since there were no low- or moderate-income CTs in the AA in the evaluation period, a geographic distribution analysis would not be meaningful.

2022

The geographic distribution of small loans to farms was poor. The bank originated no loans in the moderate-income geographies in the AA. There were no low-income CTs in this year.

2023

The geographic distribution of small loans to farms was poor. The bank originated no loans in the moderate-income geographies in the AA. There were no low-income CTs in this year.

***Lending Gap Analysis***

The OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of CNB's home mortgage loans and small loans to businesses during the evaluation period. The analysis did not identify any unexplained, conspicuous gaps.

**Distribution of Loans by Income Level of the Borrower**

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

***Home Mortgage Loans***

Refer to Table 8 in the state of Kentucky section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables, the overall borrower distribution of home mortgage loans was good.

2021

The borrower distribution of home mortgage loans was good. The percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but near to the aggregate percentage of all reporting lenders in the AA. The percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and exceeded the aggregate percentage of all reporting lenders in the AA.

2022

The borrower distribution of home mortgage loans was adequate. The percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families but exceeded the aggregate percentage of all reporting lenders in the AA. The percentage of home mortgage loans to moderate-income borrowers was near to the percentage of moderate-income families and was well below the aggregate percentage of all reporting lenders in the AA.

2023

The borrower distribution of home mortgage loans was good. The percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families but exceeded the aggregate percentage of all reporting lenders in the AA. The percentage of home mortgage loans to moderate-income borrowers was near to the percentage of moderate-income families and near to the aggregate percentage of all reporting lenders in the AA.

***Small Loans to Businesses***

Refer to Table 10 in the state of Kentucky section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Based on the data in the tables, the overall borrower distribution of small loans to businesses was excellent.

2021

The borrower distribution of small loans to businesses was excellent. The percentage of small loans to businesses with gross annual revenues of \$1 million or less exceeded the percentage of those businesses and exceeded the aggregate percentage of all reporting lenders in the AA.

2022

The borrower distribution of small loans to businesses was excellent. The percentage of small loans to businesses with gross annual revenues of \$1 million or less was near to the percentage of those businesses and exceeded the aggregate percentage of all reporting lenders in the AA.

2023

The borrower distribution of small loans to businesses was good. The percentage of small loans to businesses with gross annual revenues of \$1 million or less was below the percentage of those businesses and near to the aggregate percentage of all reporting lenders in the AA.

***Small Loans to Farms***

Refer to Table 12 in the state of Kentucky section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables, the overall borrower distribution of small loans to farms was excellent.

2021

The borrower distribution of small loans to farms was excellent. The percentage of small loans to farms with gross annual revenues of \$1 million or less exceeded the percentage of those farms and exceeded the aggregate percentage of all reporting lenders in the AA.

2022

The borrower distribution of small loans to farms was excellent. The percentage of small loans to farms with gross annual revenues of \$1 million or less exceeded the percentage of those farms and exceeded the aggregate percentage of all reporting lenders in the AA.

2023

The borrower distribution of small loans to farms was excellent. The percentage of small loans to farms with gross annual revenues of \$1 million or less exceeded the percentage of those farms and exceeded the aggregate percentage of all reporting lenders in the AA.

## **Community Development Lending**

The bank made a relatively high level of CD loans. CD lending had a positive effect on the Lending Test conclusion.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

During the evaluation period, CNB originated 14 CD loans totaling \$19.7 million in the AA. The volume of CD loans represented 3.6 percent of allocated tier 1 capital. CD loans were responsive to identified community credit needs. These loans provided financing for community services for LMI individuals and infrastructure benefiting moderate-income CTs.

The following are examples of CD loans the bank originated or purchased in the AA:

- A \$9.0 million revolving line of credit to a local government agency to fund cleanup efforts for a major ice storm and flood damages to revitalize and stabilize distressed and underserved geographies in the AA.
- A \$9.0 million revolving line of credit to a local government agency to fund construction of a flood wall in Paintsville, KY which was severely damaged due to flooding. This will revitalize and stabilize distressed and underserved geographies in the AA.
- A \$613,568 loan to an Opportunity Zone to acquire and convert vacant land into an industrial park for economic development and creation of jobs in this distressed and underserved geography in the AA.

## **Product Innovation and Flexibility**

The bank makes no use of innovative and/or flexible lending practices in order to serve AA credit needs.

## **Conclusions for Area Receiving a Limited-Scope Review**

Refer to Tables 7 through 12 in the state of State of Kentucky section of appendix D for the facts and data that support the limited-scope conclusions.

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

## **INVESTMENT TEST**

The bank's performance under the Investment Test in the state of Kentucky is rated Low Satisfactory.

## **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank's performance in the Kentucky Non-MSA was poor. The performance in the limited-scope review had a positive impact on the bank's overall performance rating for the state.

The bank had a poor level of qualified investments, including grants, particularly those that are not routinely provided by private investors.

The bank exhibited poor responsiveness to credit and community development needs. The bank did not use innovative and/or complex investments to support CD initiatives.

Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
KY Non-MSA	2	558	29	25	31	55.36	583	6.60	0	0
Lexington MSA	1	33	24	8,216	25	44.64	8,249	93.40	3	1,284
<b>Total</b>	<b>3</b>	<b>591</b>	<b>53</b>	<b>8,242</b>	<b>56</b>	<b>100.00</b>	<b>8,833</b>	<b>100.00</b>	<b>3</b>	<b>1,284</b>

\* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

CNB made 31 qualified CD investments and grants totaling \$583,122, which is equivalent to 1.6 percent of allocated tier 1 capital. The bank made 29 qualified grants totaling \$25,204. The bank made no current period CD investments. The AA benefitted from the ongoing impact of two prior period CD investments with an outstanding balance of \$557,918. The bank had no unfunded commitments. The bank’s qualified investments were responsive to affordable housing needs and community services to LMI in the AA.

The following are examples of qualified investments in the AA:

- A \$2,000 grant to a nonprofit organization that provides various services to LMI residents, including housing assistance, utilities support through programs such as education support, employment assistance, and emergency services.
- A \$1,000 grant to a nonprofit organization that recruits and trains court appointed advocates for children who has experienced abuse, neglect, or dependency so they can be safe, and have a permanent home. The nonprofit offers advocacy training, educational sessions, and additional resources.

### **Conclusions for Area Receiving a Limited-Scope Review**

Based on a limited-scope review, the bank’s performance under the Investment Test in the Lexington MSA was stronger than the bank’s overall performance under the Investment Test in the full-scope area. The performance is based on the excellent level of qualified CD investments, which had a positive impact on the bank’s overall Investment Test performance rating for the state.

### **SERVICE TEST**

The bank’s performance under the Service Test in the state of Kentucky is rated High Satisfactory.

### **Conclusions for Area Receiving a Full-Scope Review**

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

## Retail Banking Services

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

Table 5: Distribution of Branch Delivery Systems													2023
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
KY Non-MSA	60.04	7	50.00	0.00	28.57	42.86	28.57	0.0	0.00	15.00	49.63	35.37	0.00
Lexington MSA	39.96	7	50.00	0.00	14.29	42.86	28.57	14.29	6.60	22.28	37.34	31.46	2.32
<b>Total</b>	<b>100.00</b>	<b>14</b>	<b>100.00</b>	<b>0.00</b>	<b>21.43</b>	<b>42.86</b>	<b>28.57</b>	<b>7.14</b>	<b>4.85</b>	<b>20.35</b>	<b>40.59</b>	<b>32.49</b>	<b>1.71</b>

Source: FFIEC File - 2020 Census  
1/1/2023 - 12/31/2023 Bank Data  
Due to rounding, totals may not equal 100.0%

\* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Table 6: Distribution of Branch Openings/Closings								
Assessment Area	Branch Openings/Closings		Net change in Location of Branches (+ or -)					
	# of Branch Openings	# of Branch Closings	Low	Mod	Mid	Upp	NA	
KY Non-MSA	1	0	0	0	0	+1	0	
Lexington MSA	4	1	0	0	+2	+1	0	
<b>Total</b>	<b>5</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>+2</b>	<b>+2</b>	<b>0</b>	

1/1/2023 - 12/31/2023 Bank Data.

\* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

To the extent changes have been made, the bank's opening of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. Due to an acquisition, the bank established a branch in March 2023 within an upper-income geography.

CNB had seven branches in the AA, with two located in a moderate-income geography. The bank's distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies. There were no low-income geographies in the AA.

Services, including where appropriate, business hours did not vary in a way that inconvenienced the various portions of its AA, particularly LMI geographies and/or individuals. The bank maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. The bank had several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The OCC did not place significant emphasis on these alternative delivery systems, as the bank did not maintain metrics to demonstrate how effectively these channels helped meet the credit needs of low- and moderate-income individuals.

## **Community Development Services**

The bank provided an adequate level of CD services.

CD services were responsive in helping the bank address community needs, consistent with its capacity and expertise to conduct specific activities.

During the evaluation period, 11 bank employees from various lines of businesses collectively provided a total of 241 hours in support of 13 organizations. This total includes the efforts of bank employees who spent over 233 hours serving on boards and committees for eight different organizations. Within these totals, bank employees conducted financial education events, contributing eight hours in coordination with five different schools and organizations.

The following are examples of qualified activities in the AA:

- An employee served 48 hours as a board member on a county community foundation. The mission of the foundation is to empower LMI and distressed/underserved communities to thrive through collaboration, asset building, and leadership development.
- An employee served 36 hours on a college educational foundation that supports the local community and technical college. The foundation works to expand access to higher education, further regional workforce, and economic development.

## **Conclusions for Area Receiving a Limited-Scope Review**

Based on a limited-scope review, the bank's performance under the Service Test in the Lexington MSA was consistent with the bank's overall performance under the Service Test in the full-scope area.

## State of Ohio

**CRA rating for the State of Ohio<sup>4</sup>:** Low Satisfactory

**The Lending Test is rated:** Low Satisfactory

**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 adequate responsiveness to the credit needs in the AA.
- The distribution of home mortgage loans to individuals of different income levels was adequate.
- The bank made no CD loans.
- The bank had a significant level of qualified investments and grants.
- Service delivery systems were unreasonably inaccessible to portions of the AA, particularly LMI geographies and/or LMI individuals.
- The bank provided few, if any, CD services.

## Description of Institution's Operations in Ohio

CNB has one AA within the state of Ohio, which is the Columbus, OH MSA (Columbus MSA). In 2021, the AA consisted of eight CTs in Franklin County. In 2022, the bank changed the AA delineation to include the full county of Franklin. The AA delineation for 2023 continued as the full county of Franklin. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies. Refer to Appendix A for a listing of all the bank's AAs.

### Columbus MSA

Based on the FDIC Summary of Deposit Market Share Report as of June 30, 2023, the bank had a 0.02 percent deposit market share and ranked 122 out of 199 financial institutions doing business within Franklin County, OH. Strong competition for financial services existed within bank's AA, which includes nationwide and regional institutions. Primary competitors include U.S. Bank NA, ranked first with 20.3 percent deposit market share and 187 offices, The Huntington National Bank, ranked second with 15.2 percent deposit market share and 357 offices, Fifth Third Bank, NA, ranked third with 13.1 percent deposit market share and 259 offices, KeyBank NA, ranked fourth with 12.9 percent deposit market share and

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<sup>4</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

176 offices, and JPMorgan Chase Bank, NA ranked fifth with 8.5 percent deposit market share and 224 offices. CNB provided a full range of loan and deposit products and services in the AAs. The bank operated a full-service branch in the rating area, which had an on-site ATM with cash dispensing capabilities. The branch represented 1 percent of the bank's total branch network.

The following tables provide a summary of the demographics, including housing and business information for the Columbus MSA for each evaluation period.

Assessment Area(s) - Columbus MSA						2021
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	8	0.00	0.00	12.50	87.50	0.00
Population by Geography	26,617	0.00	0.00	24.18	75.82	0.00
Housing Units by Geography	11,110	0.00	0.00	23.14	76.86	0.00
Owner-Occupied Housing by Geography	8,909	0.00	0.00	20.33	79.67	0.00
Occupied Rental Units by Geography	2,032	0.00	0.00	35.24	64.76	0.00
Vacant Units by Geography	169	0.00	0.00	26.04	73.96	0.00
Businesses by Geography	2,018	0.00	0.00	14.72	85.28	0.00
Farms by Geography	29	0.00	0.00	13.79	86.21	0.00
Family Distribution by Income Level	7,340	7.93	12.92	14.55	64.60	0.00
Household Distribution by Income Level	10,941	8.89	13.05	14.98	63.07	0.00
Unemployment rate (%)	4.25	0.00	0.00	7.77	2.86	0.00
Households Below Poverty Level (%)	2.97	0.00	0.00	3.56	2.79	0.00
Median Family Income (18140 - Columbus, OH MSA)	\$70,454	Median Housing Value			\$255,100	
Median Family Income (18140 - Columbus, OH MSA) for 2021	\$83,900	Median Gross Rent			\$1,039	
		Families Below Poverty Level			2.22	
FFIEC File - 2010 Census						
2021 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Assessment Area(s) - Columbus MSA						2022-2023
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	328	17.38	24.09	29.88	26.22	2.44
Population by Geography	1,323,807	13.17	22.57	33.35	28.89	2.01
Housing Units by Geography	559,478	13.85	22.98	33.67	28.12	1.38
Owner-Occupied Housing by Geography	278,490	7.13	18.36	37.20	36.91	0.40
Occupied Rental Units by Geography	240,747	19.00	27.96	31.22	19.68	2.14
Vacant Units by Geography	40,241	29.50	25.12	23.93	17.78	3.67
Businesses by Geography	67,250	11.78	19.71	32.08	34.78	1.65
Farms by Geography	1,519	10.86	20.54	34.56	32.92	1.12
Family Distribution by Income Level	301,991	24.68	17.90	20.28	37.14	0.00
Household Distribution by Income Level	519,237	25.37	17.40	18.58	38.65	0.00
Unemployment rate (%)	4.84	10.03	6.31	4.05	2.49	8.75
Households Below Poverty Level (%)	13.13	32.17	18.04	8.79	4.93	41.07
Median Family Income (18140 - Columbus, OH MSA)		\$84,088	Median Housing Value			\$163,200
Median Family Income (18140 - Columbus, OH MSA) for 2023		\$100,900	Median Gross Rent			\$979
			Families Below Poverty Level			10.82
FFIEC File - 2020 Census						
2023 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

## Economic Conditions

According to Moody's Analytics, Columbus' economy has faced challenges recently, in contrast to broader growth in Ohio. The metro area lost jobs in finance, retail, manufacturing, and transportation, although healthcare remained strong. Homebuilding outpaced pre-pandemic levels.

Enrollment at The Ohio State University supports faculty and staff levels, indirectly benefiting housing, retail, and leisure sectors.

In finance, Columbus remains pivotal for banking and insurance, though job growth prospects are hindered by weak loan demand and cautious insurer hiring. Consumer belt-tightening is expected to temper life insurance demand, while market uncertainty impacts asset management.

Despite short-term hurdles, the AA has several structural advantages, including strong population growth, migration patterns, and education levels. Its manageable living costs and favorable business environment position it well for long-term investment.

## Employment

According to Moody's Analytics, top employers in the AA include Ohio State University, OhioHealth, JPMorgan Chase, Nationwide Children's Hospital Inc., and The Kroger Company.

According to the BLS, the unemployment rate declined throughout the evaluation period in the AA. In January 2021, the rate was 6.7 percent compared to 3.2 percent in December 2023. The unemployment

rate in the AA was lower than the overall rate for the state of Ohio, which was 3.5 percent at the end of the evaluation period. The national unemployment rate was 6.4 percent in January 2021 and 3.8 percent in December 2023.

## **Housing**

The OCC evaluated the disparity between the median family incomes within the AA and the cost of housing. Based on the FFIEC, the AMFI is \$100,900 in the AA. The annual maximum low-income and maximum moderate-income calculations are based on 50 percent and 80 percent of the FFIEC AMFI for the AA. Additionally, low-income families earned less than \$50,450 and moderate-income families earned at least \$50,450 and less than \$80,720 in the AA. According to Realtor.com data, the median list price across the AA increased from \$299,900 in January 2021 to \$359,900 in December 2023, reflecting a 20 percent increase.

One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$1,261 for a low-income borrower and \$2,018 for a moderate-income borrower. Assuming a 30-year mortgage with a 6 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA's median list price would be \$1,932. This demonstrates that LMI borrowers would be challenged to afford a home mortgage loan in this AA.

## **Community Contact**

As part of this evaluation, the OCC reviewed information from two community contact interviews conducted during the evaluation period. The community contacts consist of representatives from a city department focused on developing housing, and a nonprofit organization which improves community lives through financial and housing education. The AA faces several community needs related to housing, financial literacy, and economic support amid a growing and aging population. The contacts identified the following needs within the community:

- Affordable housing with limited availability and competition from investors make it challenging for potential homebuyers.
- Financing for purchases or rehabilitation of one- to four-family homes, including down payment assistance programs.
- Financial literacy programs and coaching on personal finance management.
- Grow and attract industries with jobs paying over the median income.

## **Scope of Evaluation in Ohio**

The OCC conducted a full scope review of the Columbus, OH MSA as it is the only AA in the rating area.

When evaluating performance in the AA, the bank's limited capacity and expertise were considered to ensure a fair assessment that reflects its resources and skill limitations. The bank did not originate or purchase a sufficient number of small loans to businesses to conduct a meaningful analysis.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO

### LENDING TEST

The bank's performance under the Lending Test in state of Ohio is rated Low Satisfactory.

#### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Columbus OH MSA was adequate.

#### Lending Activity

Lending levels reflected adequate responsiveness to AA credit needs.

Table 3: Lending Activity							2021-2023	
Number of Loans								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Columbus OH MSA	21	1	0	0	0	22	100.00	100.00
<b>Total</b>	<b>21</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>22</b>	<b>100.00</b>	<b>100.00</b>
Dollar Volume of Loans (\$000s)								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Columbus OH MSA	8,461	300	0	0	0	8,761	100.00	100.00
<b>Total</b>	<b>8,461</b>	<b>300</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>8,761</b>	<b>100.00</b>	<b>100.00</b>

Source: 1/1/2021 - 12/31/2023 Bank Data.  
Due to rounding, totals may not equal 100.0%

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

Overall lending levels reflect adequate responsiveness to credit needs. During the evaluation period, CNB originated 21 home mortgage loans and one small business loan in the AA.

According to 2023 Peer HMDA data, the bank ranked 179th out of 583 lenders with a market share of 0.05 percent. This rank placed the bank in the top 30.7 percent in the AA. The top five lenders and their respective market share were, Huntington National Bank with 10.6 percent, Kemba Financial Credit Union with 4.1 percent, Fifth Third Bank, NA with 3.5 percent, US Bank NA with 3.2 percent, and Rocket Mortgage with 3.1 percent. The bank's lending performance, relative to the number of mortgage lenders in this AA, was stronger than the bank's deposit base. The bank was in the top 30.7 percent for lending compared to the top 61.3 percent for deposits.

CNB had no small business market share during the evaluation period. According to 2023 Small Business peer data, 124 lenders originated small business loans in the AA. The top five lenders with their respective market share were JPMorgan Chase Bank NA with 29.8 percent, American Express National Bank with

23.3 percent, US Bank NA with 6.8 percent, Capital One, NA with 5.9 percent, and Citibank NA with 4.2 percent. The bank's lending performance, relative to the number of small business lenders in this AA, is lower than the bank's deposit base. The bank has no percentage share for lending compared to the top 61.3 percent for deposits.

### **Distribution of Loans by Income Level of the Geography**

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

#### ***Home Mortgage Loans***

Refer to Table 7 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.

Based on the data in the tables and the performance context discussed above, the overall geographic distribution of home mortgage loans was adequate.

2021

The bank did not originate or purchase a sufficient number of loans to conduct a meaningful analysis.

2022-2023

The percentage of home mortgage loans in low-income geographies exceeded the percentage of owner-occupied housing units in those geographies and exceeded the aggregate percentage of all reporting owners. The percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied housing units in those geographies and was below the aggregate percentage of all reporting owners.

#### ***Small Loans to Businesses***

Refer to Table 9 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 bank did not originate or purchase a sufficient number of loans to conduct a meaningful analysis.

#### ***Lending Gap Analysis***

The OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of CNB's home mortgage loans and small loans to businesses during the evaluation period. The analysis did not identify any unexplained, conspicuous gaps.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibited an adequate distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the bank.

### ***Home Mortgage Loans***

Refer to Table 8 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.

Based on the data in the tables and the performance context discussed above, the overall borrower distribution of home mortgage loans was adequate.

2021

The bank did not originate or purchase a sufficient number of loans to conduct a meaningful analysis.

2022-2023

The borrower distribution of home mortgage loans was adequate. The percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and was near to the aggregate percentage of all reporting lenders in the AA.

### ***Small Loans to Businesses***

Refer to Table 10 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.

CNB only originated one small business loan during the evaluation period which was not sufficient to conduct a meaningful analysis.

### **Community Development Lending**

The bank has made few if any CD loans during the evaluation period.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

### **Product Innovation and Flexibility**

The bank made no use of innovative and/or flexible lending practices in order to serve the AA credit needs.

### **INVESTMENT TEST**

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

### **Conclusions for Area Receiving a Full-Scope Review**

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

The bank had a significant level of qualified investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibited good responsiveness to credit and community development needs. The bank does not use innovative and/or complex investments to support CD initiatives.

Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Columbus MSA	3	199	7	2,006	10	100.0	2,205	100.0	1	104
<b>Total</b>	<b>3</b>	<b>199</b>	<b>7</b>	<b>2,006</b>	<b>10</b>	<b>100.0</b>	<b>2,205</b>	<b>100.0</b>	<b>1</b>	<b>104</b>

\* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

CNB made 10 qualified CD investments and grants totaling \$2.2 million, which is the equivalent of 410.3 percent of allocated tier 1 capital. The bank made one current period CD investment which totaled \$2.0 million and six qualified grants totaling \$6,000. The current period investments consisted of \$2.0 million in a LIHTC. Additionally, the AA benefitted from the ongoing impact of three prior period CD investments with an outstanding balance of \$199,456. The bank had an unfunded commitment totaling \$103,600. The bank’s CD investments were responsive to affordable housing needs and community services to LMI in the AA.

**SERVICE TEST**

The bank’s performance under the Service Test in state of Ohio is rated Needs to Improve.

**Conclusions for Area Receiving a Full-Scope Review**

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

**Retail Banking Services**

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	NA	Low	Mod	Mid	Upp	NA
Columbus MSA	100.00	1	100.00	0	0	0	100.00	0	13.17	22.57	33.35	28.89	2.01
<b>Total</b>	<b>100.00</b>	<b>1</b>	<b>100.00</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>100.00</b>	<b>0</b>	<b>13.17</b>	<b>22.57</b>	<b>33.35</b>	<b>28.89</b>	<b>2.01</b>

Source: FFIEC File - 2020 Census  
 1/1/2022 - 12/31/2023 Bank Data  
 Due to rounding, totals may not equal 100.0%

\* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

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

CNB had one branch in the AA, which was in an upper-income geography. The bank's distribution of branches in LMI geographies was significantly below the percentage of the population living within those geographies.

Services, including where appropriate, business hours did not vary in a way that inconvenienced the various portions of its AA, particularly LMI geographies and/or individuals. The bank maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. The bank had several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The OCC did not place significant emphasis on these alternative delivery systems, as the bank did not maintain metrics to demonstrate how effectively these channels helped meet the credit needs of low- and moderate-income individuals.

### **Community Development Services**

The bank provided few, if any CD services.

During the evaluation period, a bank employee provided a total of 30 hours in support to a nonprofit organization serving on the board.

## State of Virginia

**CRA rating for the State of Virginia<sup>5</sup>:** Satisfactory

**The Lending Test is rated:** High Satisfactory

**The Investment Test is rated:** High Satisfactory

**The Service Test is rated:** Low Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to the credit needs in the AA.
- The geographic distribution of loans was good.
- The distribution of loans to individuals of different income levels and different sizes was good.
- The bank made an adequate level of CD loans.
- The bank had a significant level of qualified investments and grants.
- 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.

## Description of Institution's Operations in Virginia

CNB has two AAs within the state of Virginia. These AAs include the Staunton-Stuarts Draft MSA (Staunton MSA) and the Virginia Non-MSA (VA Non-MSA). The Staunton MSA consists of the counties of Augusta, Staunton City, and Waynesboro City. The VA Non-MSA consists of the counties of Rockbridge, Buena Vista City, and Lexington City. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies. Refer to Appendix A for a listing of all the bank's AAs.

### Staunton MSA

Based on the FDIC Summary of Deposit Market Share Report as of June 30, 2023, the bank ranked fourth out of 14 with an 11 percent deposit market share in the Staunton MSA. Strong competition for financial services existed within bank's AA, which includes nationwide and regional institutions. The top four competitors and their respective market share were The First Bank and Trust Company with 24.1 percent, Atlantic Union Bank with 20.2 percent, Truist Bank with 15.4 percent, and Wells Fargo Bank, NA with 5.8 percent.

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<sup>5</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

CNB provided a full range of loan and deposit products and services in the AAs. The bank operated 10 full-service branches in the rating area. All branches in the AA had an on-site ATM with cash dispensing capabilities. The branches represented 10.2 percent of the bank's total branch network.

The following tables provide a summary of the demographics, including housing and business information for the Staunton MSA for each evaluation period.

Assessment Area(s) - Staunton MSA						2021
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	24	4.17	12.50	75.00	8.33	0.00
Population by Geography	119,396	1.09	11.96	79.59	7.37	0.00
Housing Units by Geography	53,374	1.17	11.01	81.03	6.79	0.00
Owner-Occupied Housing by Geography	33,456	0.25	9.20	83.15	7.41	0.00
Occupied Rental Units by Geography	14,112	3.39	13.56	77.66	5.39	0.00
Vacant Units by Geography	5,806	1.05	15.24	77.06	6.65	0.00
Businesses by Geography	5,240	3.89	5.59	82.82	7.69	0.00
Farms by Geography	498	0.80	4.02	91.16	4.02	0.00
Family Distribution by Income Level	32,221	19.70	18.35	22.71	39.23	0.00
Household Distribution by Income Level	47,568	22.88	17.39	18.90	40.82	0.00
Unemployment rate (%)	4.92	4.91	6.62	4.63	5.75	0.00
Households Below Poverty Level (%)	12.72	42.42	21.46	11.68	6.64	0.00
Median Family Income (44420 - Staunton-Stuarts Draft, VA MSA)		\$60,603	Median Housing Value			\$187,350
Median Family Income (44420 - Staunton-Stuarts Draft, VA MSA) for 2021		\$71,200	Median Gross Rent			\$825
			Families Below Poverty Level			8.92
FFIEC File - 2010 Census						
2021 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Assessment Area(s) - Staunton MSA						2022-2023
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	30	0.00	16.67	66.67	16.67	0.00
Population by Geography	125,433	0.00	17.38	71.18	11.43	0.00
Housing Units by Geography	54,639	0.00	17.46	70.20	12.35	0.00
Owner-Occupied Housing by Geography	35,628	0.00	12.04	74.58	13.39	0.00
Occupied Rental Units by Geography	14,344	0.00	29.64	63.23	7.14	0.00
Vacant Units by Geography	4,667	0.00	21.41	58.20	20.40	0.00
Businesses by Geography	4,736	0.00	12.44	69.91	17.65	0.00
Farms by Geography	410	0.00	6.83	78.29	14.88	0.00
Family Distribution by Income Level	31,927	19.64	17.90	23.53	38.92	0.00
Household Distribution by Income Level	49,972	23.76	16.52	18.21	41.50	0.00
Unemployment rate (%)	3.38	0.00	4.39	2.94	4.83	0.00
Households Below Poverty Level (%)	10.61	0.00	20.10	8.70	8.35	0.00
Median Family Income (44420 - Staunton-Stuarts Draft, VA MSA)		\$73,822	Median Housing Value			\$206,200
Median Family Income (44420 - Staunton-Stuarts Draft, VA MSA) for 2023		\$92,800	Median Gross Rent			\$848
			Families Below Poverty Level			7.42
FFIEC File - 2020 Census 2023 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

## Economic Conditions

According to Moody's Analytics, Staunton's economy is facing challenges with sluggish employment growth for nearly two years. Private service sector employment has decreased, while goods producers have seen slight gains, and government employment has done well. Housing prices have improved year-over-year, aligning with state trends, and homebuilding activity has increased from mid-year lows.

The logistics sector remains robust, benefiting from its strategic location and proximity to major population centers and ports. This has attracted large national companies to open distribution centers in the area, ensuring solid growth in transportation and warehousing. In the manufacturing sector, food manufacturing, which accounts for a significant portion of factory jobs, faces mixed price fundamentals.

Demographic and structural weaknesses, including below-average population growth, low educational attainment, and a scarcity of high-wage jobs, hinder robust economic performance, suggesting the AA may lag state and national averages in the long term.

## Employment

According to Moody's Analytics, top employers in the AA include Augusta Health, Hershey Chocolate of Virginia, Target Corp., McKee Foods Corp., and Walmart Inc.

According to the BLS, the unemployment rate declined throughout the evaluation period in the AA. In January 2021, the rate was 4.1 percent compared to 2.1 percent in December 2023. The unemployment

rate in the AA was lower than the overall rate for the state of Virginia, which was 2.4 percent at the end of the evaluation period. The national unemployment rate was 6.4 percent in January 2021 and 3.8 percent in December 2023.

## **Housing**

The OCC evaluated the disparity between the median family incomes within the AA and the cost of housing. Based on the FFIEC, the AMFI is \$92,800 in the AA. The annual maximum low-income and maximum moderate-income calculations are based on 50 percent and 80 percent of the FFIEC AMFI for the AA. Additionally, low-income families earned less than \$46,400 and moderate-income families earned at least \$46,400 and less than \$74,240 in the AA. According to Realtor.com data, the median list price across the AA increased from \$279,900 in January 2021 to \$350,000 in December 2023, reflecting a 25 percent increase.

One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$1,160 for a low-income borrower and \$1,856 for a moderate-income borrower. Assuming a 30-year mortgage with a 6 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA's median list price would be \$1,879. This demonstrates that LMI borrowers would be challenged to afford a home mortgage loan in this AA.

## **Community Contact**

As part of this evaluation, the OCC reviewed information from three community contact interviews conducted during the evaluation period. The community contacts consist of representatives from a nonprofit organization that empowers LMI individuals and families through programs, the longest-running private homeless shelter in the area, an organization that collaborates with public and private sectors to foster an environment conducive to business growth, and workforce development in the region. The contacts identified the following needs within the community:

- Affordable housing, including both single family and multifamily units for rent.
- Mortgage financing and consumer loans, especially auto loans.
- Financial education programs that assist consumers with building and maintaining savings, student loan counseling, debt management counseling, and second chance checking accounts.
- Service on the board of directors of nonprofit organizations and other professionals for volunteering.
- Access to workforce development and job opportunities.

## **Scope of Evaluation in Virginia**

The OCC conducted a full-scope review of the Staunton MSA and a limited-scope review of the VA Non-MSA.

The Staunton MSA received the highest weighting as it represents 54.74 percent of the state's total deposits, 76 percent of state's total loans, and 50 percent of the state's branches. Home mortgage loans, which accounted for 59.5 percent of the loans made in the state's AAs during the evaluation period, were

given greater weight than small business loans which represented 38.8 percent of total loans originated in the AA.

For the analysis of distribution of loans to geographies with different income levels, greater consideration was given to the bank's performance in moderate-income geographies.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN VIRGINIA

### LENDING TEST

The bank's performance under the Lending Test in state of Virginia is rated High Satisfactory.

### Conclusions for Area Receiving a Full-Scope Review

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

### Lending Activity

Lending levels reflected good responsiveness to AAs credit needs.

Table 3: Lending Activity								2021-2023	
Number of Loans									
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits	
Staunton MSA	459	299	12	1	0	771	75.97	54.74	
VA Non-MSA	211	54	2	0	0	267	24.03	45.26	
<b>Total</b>	<b>670</b>	<b>353</b>	<b>14</b>	<b>1</b>	<b>0</b>	<b>1,038</b>	<b>100.00</b>	<b>100.00</b>	
Dollar Volume of Loans (\$000s)									
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits	
Staunton MSA	76,129	32,812	385	70	0	109,396	77.96	54.74	
VA Non-MSA	25,584	6,171	97	0	0	31,852	22.04	45.26	
<b>Total</b>	<b>101,713</b>	<b>38,983</b>	<b>482</b>	<b>70</b>	<b>0</b>	<b>141,248</b>	<b>100.00</b>	<b>100.00</b>	

Source: 1/1/2021 - 12/31/2023 Bank Data.  
Due to rounding, totals may not equal 100.0%

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

Based on 2023 HMDA peer data, CNB ranked second out of 253 lenders with a 5.6 percent market share. Competition for home mortgage loans was strong in the AA. The top four home mortgage lenders, Dupont Community Credit Union, Truist Bank, Atlantic Union Bank, and Alcovia Mortgage LLC., had a combined market share of 29 percent. The bank's lending performance, relative to the number of mortgage lenders in this AA, was stronger than the bank's deposit base. The bank was in the top one percent for lending compared to the top 28.6 percent for deposits.

Based on 2023 peer small business data, CNB ranked eighth out of 59 lenders with a 4.7 percent market share. The top five lenders, American Express National Bank, Synchrony Bank, JPMorgan Chase Bank NA, Capital One, NA, and Citibank, NA had a combined market share of 65.2 percent. The bank's lending performance, relative to the number of lenders in this AA, was stronger than the bank's deposit base. The bank was in the top 13.6 percent for lending compared to the top 28.6 percent for deposits.

### **Distribution of Loans by Income Level of the Geography**

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

#### ***Home Mortgage Loans***

Refer to Table 7 in the state of Virginia 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.

Based on the data in the tables, the overall geographic distribution of home mortgage loans was good.

2021

There are 0.3 percent of owner-occupied housing units in low-income geographies. Given the limited lending opportunities in low-income geographies, more emphasis was placed on the bank's lending in moderate-income geographies.

The geographic distribution of home mortgage loans was good. The geographic distribution of loans in low-income CTs exceeded the percentage of owner-occupied housing units and exceeded the aggregate percentage of all reporting lenders in the AA. The geographic distribution of home mortgage loans in moderate-income CTs was below the percentage of owner-occupied housing units and well below the aggregate percentage of all reporting lenders in the AA.

2022-2023

The geographic distribution of home mortgage loans was good. The geographic distribution of home mortgage loans in moderate-income CTs exceeded the percentage of owner-occupied housing units and was below the aggregate percentage of all reporting lenders in the AA. There were no low-income CTs in the AA for this evaluation period.

#### ***Small Loans to Businesses***

Refer to Table 9 in the state of Virginia 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.

Based on the data in the tables, the overall geographic distribution of small loans to businesses was excellent.

2021

The geographic distribution of small loans to businesses was excellent. The geographic distribution of small loans to businesses in low-income CTs exceeded the proportion of businesses in low-income CTs and exceeded the aggregate percentage of all reporting lenders in the AA. The geographic distribution of small loans to businesses in moderate-income CTs exceeded the proportion of businesses in moderate-income CTs and exceeded the aggregate percentage of all reporting lenders in the AA.

2022-2023

The geographic distribution of small loans to businesses was good. The geographic distribution of small loans to businesses in moderate-income CTs was near to the proportion of businesses in moderate-income CTs and was near to the aggregate percentage of all reporting lenders in the AA. There were no low-income CTs in the AA for this evaluation period.

### ***Lending Gap Analysis***

The OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of CNB's home mortgage loans and small loans to businesses during the evaluation period. The analysis did not identify any unexplained, conspicuous gaps.

### **Distribution of Loans by Income Level of the Borrower**

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

### ***Home Mortgage Loans***

Refer to Table 8 in the state of Virginia 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.

Based on the data in the tables, the overall borrower distribution of home mortgage loans was good.

2021

The borrower distribution of home mortgage loans was good. The percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers was near to the percentage of moderate-income families and below the aggregate percentage of all reporting lenders.

2022-2023

The borrower distribution of home mortgage loans was good. The percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families but near to the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and exceeded the aggregate percentage of all reporting lenders.

### ***Small Loans to Businesses***

Refer to Table 10 in the state of Virginia 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.

Based on the data in the tables, the overall borrower income distribution of small loans to businesses was good.

2021

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

2022-2023

The borrower distribution of small loans to businesses was good. The percentage of small loans to businesses with gross annual revenues of \$1 million or less was below the percentage of those businesses but was near to the aggregate percentage of all reporting lenders.

### **Community Development Lending**

The bank made a low level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

CNB originated one CD loan totaling \$70,000 in the AA. CD volume was equivalent to 0.3 percent of allocated tier 1 capital. The bank's CD loan demonstrates a low level of responsiveness to community needs. This loan financed the purchase of fire rescue equipment for a local fire department in a moderate-income CT in the AA.

### **Product Innovation and Flexibility**

The bank made no use of innovative and/or flexible lending practices in order to serve AA credit needs.

### **Conclusions for Area Receiving a Limited-Scope Review**

Refer to Tables 7 through 10 in the state of Virginia section of appendix D for the facts and data that support the limited-scope conclusions.

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

## INVESTMENT TEST

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

### Conclusions for Area Receiving a Full-Scope Review

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

The bank had a significant level of qualified investments, including grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibited good responsiveness to credit and community development needs. The bank occasionally used innovative and/or complex investments to support CD initiatives.

Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Staunton MSA	1	234	40	3,225	41	56.16	3,459	98.13	1	781
VA Non-MSA	1	47	31	19	32	43.84	66	1.87	0	0
<b>Total</b>	<b>2</b>	<b>281</b>	<b>71</b>	<b>3,244</b>	<b>73</b>	<b>100.00</b>	<b>3,525</b>	<b>100.00</b>	<b>1</b>	<b>781</b>

\* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

CNB made 41 qualified CD investments and grants totaling \$3.5 million, which is equivalent to 13.2 percent of allocated tier 1 capital. The bank made two current period CD investments which totaled \$3.2 million and 38 qualified grants totaling \$34,832. The current period investments consisted of \$3.2 million in two LIHTC. Additionally, the AA benefitted from the ongoing impact of a prior period CD investments with an outstanding balance of \$234,000. The bank had an unfunded commitment totaling \$781,500. The bank's CD investments were responsive to affordable housing needs, community services to LMI individuals, and economic development support in the AA.

The following are examples of qualified investments in the AA:

- \$7,989 in grants to a nonprofit organization that identifies health and human service needs and securing the resources for LMI individuals and families to education, financial stability, and health advocacy. The funds were part of the bank's initiative to match employee donations.
- \$7,500 in grants to a nonprofit organization that supports entrepreneurs and small business owners by connecting various resource. The nonprofit serves as a direct lender offering small dollar loans to start-ups and existing small businesses. Its programming provides training and networking opportunities in the region.
- \$3,000 in grants to a nonprofit organization which focuses on completing critical repairs at no cost to LMI homeowners.

### Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the VA Non-MSA was weaker than the bank's overall performance under the Investment Test in the full-scope area. The

performance was based on the very poor level of qualified CD investments, which had a neutral impact on the bank's overall Investment Test performance rating for the state.

## SERVICE TEST

The bank's performance under the Service Test in the state of Virginia is rated Low Satisfactory.

## Conclusions for Area Receiving a Full-Scope Review

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

## Retail Banking Services

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

													2023
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
Staunton MSA	54.74	5	50.00	0.00	0.00	80.00	20.00	0.00	0.00	17.38	71.18	11.43	0.00
VA Non-MSA	45.26	5	50.00	0.00	0.00	60.00	40.00	0.00	0.00	4.06	66.14	26.44	3.35
<b>Total</b>	<b>100.00</b>	<b>10</b>	<b>100.00</b>	<b>0.00</b>	<b>0.00</b>	<b>70.00</b>	<b>30.00</b>	<b>0.00</b>	<b>0.00</b>	<b>12.16</b>	<b>69.21</b>	<b>17.31</b>	<b>1.31</b>

Source: FFIEC File - 2020 Census  
1/1/2022 - 12/31/2023 Bank Data  
Due to rounding, totals may not equal 100.0%

\* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

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

CNB had five branches in the AA, with none located in a LMI geographies. The bank's distribution of branches in LMI geographies was below the percentage of the population living within those geographies. There are no low-income geographies in the AA. Examiners further considered two middle- or upper-income branches, that were within proximity from LMI geographies within the AA, which improved access and had a positive impact on the Service Test conclusion.

Services, including where appropriate, business hours did not vary in a way that inconvenienced the various portions of its AA, particularly LMI geographies and/or individuals. The bank maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. The bank had several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The OCC did not place significant emphasis on these alternative delivery systems, as the bank did not maintain metrics to demonstrate how effectively these channels helped meet the credit needs of low- and moderate-income individuals.

## **Community Development Services**

The bank provided an adequate level of CD services.

CD services were responsive in helping the bank address community needs, consistent with its capacity and expertise to conduct specific activities.

During the evaluation period, 19 bank employees from various lines of businesses collectively provided a total of 129 hours in support of 15 organizations. This total includes the efforts of five bank employees who spent over 104 hours serving on boards and committees for different organizations. Within these totals, bank employees conducted financial education events, contributing 25 hours in coordination with six different schools and organizations.

The following are examples of qualified activities in the AA:

- An employee served 72 hours as a board member to a nonprofit organization that promotes economic growth and development of downtown small businesses.
- An employee served 9.5 hours as a board member to a nonprofit organization that provides services for low-income, elderly, disabled or disadvantaged homeowners in the AA. The nonprofit supports homeowners with roof replacement, wheelchair ramps, accessibility modifications and general repairs who otherwise couldn't afford it.

## **Conclusions for Area Receiving a Limited-Scope Review**

Based on a limited-scope review, the bank's performance under the Service Test in the VA Non-MSA was consistent with the bank's overall performance under the Service Test in the full-scope area.

## State of West Virginia

**CRA rating for the State of West Virginia<sup>6</sup>:** 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 the credit needs in the AA.
- The geographic distribution of loans was adequate.
- The distribution of home mortgage loans to individuals of different income levels and small businesses of different sizes was good.
- The bank made a relatively high level of CD loans.
- The bank had an excellent level of qualified investments and grants.
- Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the bank's AAs.
- The bank provided a relatively high level of CD services.

## Description of Institution's Operations in West Virginia

CNB has three AAs within the state of West Virginia. These AAs include the Beckley MSA, Morgantown MSA, and West Virginia Non-MSA (WV Non-MSA). The Beckley MSA consists of the counties of Fayette and Raleigh. The Morgantown MSA consists of Monongalia County. The WV Non-MSA consists of the counties of Braxton, Greenbrier, Harrison, Mason, Mercer, Nicholas, Pocahontas, and Summers. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies. Refer to Appendix A for a listing of all the bank's AAs.

### West Virginia Non-MSA

Based on the FDIC Summary of Deposit Market Share Report as of June 30, 2023, the bank had a 12.3 percent deposit market share and ranked second out of 27 financial institutions doing business within the AA. Strong competition for financial services existed within the bank's AA, which includes nationwide

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<sup>6</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

and regional institutions. Primary competitors included Truist Bank, ranked first with deposit market share of 20.5 percent with 6 branches, First Community Bank ranked third with deposit market share of 10.9 percent with 10 branches, Summit Community Bank, Inc., ranked fourth with deposit market share of 7.9 percent with eight branches, and Peoples Bank ranked fifth with deposit market share of 7 percent with eight branches.

CNB provided a full range of loan and deposit products and services in the AAs. The bank operated 17 full-service branches in the rating area. All branches in the AA have an on-site ATM with cash dispensing capabilities. The branches represent 17.3 percent of the bank’s total branch network.

The following tables provide a summary of the demographics, including housing and business information for the WV Non-MSA for each evaluation period.

Assessment Area(s) - WV Non-MSA						2021
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	69	0.00	13.04	65.22	21.74	0.00
Population by Geography	256,369	0.00	9.90	67.14	22.96	0.00
Housing Units by Geography	130,403	0.00	9.90	69.10	21.00	0.00
Owner-Occupied Housing by Geography	78,553	0.00	8.78	68.38	22.84	0.00
Occupied Rental Units by Geography	26,292	0.00	13.46	63.23	23.31	0.00
Vacant Units by Geography	25,558	0.00	9.71	77.33	12.96	0.00
Businesses by Geography	8,603	0.00	10.64	57.72	31.64	0.00
Farms by Geography	502	0.00	4.38	73.90	21.71	0.00
Family Distribution by Income Level	69,051	20.57	16.85	20.67	41.91	0.00
Household Distribution by Income Level	104,845	23.98	16.08	17.02	42.92	0.00
Unemployment rate (%)	7.68	0.00	8.76	8.26	5.86	0.00
Households Below Poverty Level (%)	18.67	0.00	27.35	18.92	14.16	0.00
Median Family Income (Non-MSAs - WV)		\$48,107		Median Housing Value		\$85,000
Median Family Income (Non-MSAs - WV) for 2021		\$54,600		Median Gross Rent		\$588
				Families Below Poverty Level		14.38
FFIEC File - 2010 Census						
2021 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Assessment Area(s) - WV Non-MSA						2022-2023
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	78	1.28	19.23	55.13	24.36	0.00
Population by Geography	240,894	1.00	17.09	56.38	25.53	0.00
Housing Units by Geography	131,320	1.04	18.25	57.82	22.89	0.00
Owner-Occupied Housing by Geography	76,764	0.68	17.25	56.19	25.88	0.00
Occupied Rental Units by Geography	26,382	1.92	18.25	56.07	23.76	0.00
Vacant Units by Geography	28,174	1.19	20.96	63.92	13.94	0.00
Businesses by Geography	7,837	1.11	15.80	53.57	29.53	0.00
Farms by Geography	458	0.66	12.88	54.80	31.66	0.00
Family Distribution by Income Level	66,965	20.34	17.06	20.22	42.39	0.00
Household Distribution by Income Level	103,146	23.86	15.96	17.49	42.69	0.00
Unemployment rate (%)	6.45	14.67	8.23	6.44	5.25	0.00
Households Below Poverty Level (%)	16.94	33.46	20.20	17.09	13.70	0.00
Median Family Income (Non-MSAs - WV)		\$55,205		Median Housing Value		\$106,150
Median Family Income (Non-MSAs - WV) for 2023		\$64,200		Median Gross Rent		\$689
				Families Below Poverty Level		12.72
FFIEC File - 2020 Census						
2023 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

During the evaluation period, the bank had five distressed or underserved nonmetropolitan middle-income geographies in the AA.

### Economic Conditions

According to Moody's Analytics, the state of West Virginia's economy is stagnating, with employment barely surpassing pre-pandemic levels. Recent employment losses in leisure/hospitality, finance, business services, and government are offsetting gains in healthcare, mining, and construction. House prices are close to their early 2020 levels.

The state heavily relies on coal mining, which has fully recovered from pandemic losses but employs fewer workers than a decade ago due to declining demand. Coal is primarily used for electricity generation, and while natural gas price increases have provided a minor boost in coal demand, significant job expansion in coal mining is unlikely without prolonged natural gas price elevation.

West Virginia's population has not grown since the 1930s and has decreased for nine consecutive years, curbing growth in healthcare, leisure/hospitality, retail, and personal services, though the aging population will slightly boost healthcare jobs. Overall, West Virginia's economy will remain behind regional and national benchmarks due to demographic challenges and dependence on coal mining.

### Employment

According to Moody's Analytics, top employers in the state of West Virginia include WVU Medicine, Vandalia Health, Marshall Health, and Walmart Inc.

According to the BLS, the unemployment rate declined throughout the evaluation period in the AA. In January 2021, the average rate for the counties was 7.6 percent compared to 3.9 percent in December 2023. The unemployment rate in the AA was lower than the overall rate for the state of West Virginia, which was 3.8 percent at the end of the evaluation period. The national unemployment rate was 6.4 percent in January 2021 and 3.8 percent in December 2023.

## **Housing**

The OCC evaluated the disparity between the median family incomes within the AA and the cost of housing. Based on the FFIEC, the AMFI is \$64,200 in the AA. The annual maximum low-income and maximum moderate-income calculations are based on 50 percent and 80 percent of the FFIEC AMFI for the AA. Additionally, low-income families earned less than \$32,100 and moderate-income families earned at least \$32,100 and less than \$51,360 in the AA. According to Realtor.com data, the median list price across the eight counties across the AA increased from \$146,038 in January 2021 to \$212,688 in December 2023, reflecting a 45.6 percent increase.

One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$803 for a low-income borrower and \$1,284 for a moderate-income borrower. Assuming a 30-year mortgage with a 6 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA's median list price would be \$1,142. This demonstrates that low-income borrowers would be challenged to afford a home mortgage loan in this AA.

## **Community Contact**

As part of this evaluation, the OCC reviewed information from three community contact interviews conducted during the evaluation period. The community contacts consist of representative from three different county economic development organizations working in the AA that serves to attract new businesses, support existing businesses, develop workforce talent, improve access to childcare, and address housing needs. The contacts identified the following needs within the community:

- Affordable housing, address the aging housing stock, and the limited availability of new construction.
- Access to capital, specifically small business micro loans.
- Improved access to affordable childcare to boost workforce participation.
- Financial and credit education tailored for residents and small business owners.
- Increased support for community infrastructure to aid business growth and attract workers.

## **Scope of Evaluation in West Virginia**

The OCC conducted a full-scope review of the WV Non-MSA and limited-scope reviews of the Beckley MSA and the Morgantown MSA.

The WV Non-MSA received the greatest weighting as it represents 64.1 percent of the rating area's deposits, 52.5 percent of the rating area's total loans, and 63 percent of the rating area's total branches. Home mortgage loans, which account for 79.8 percent of the state's total loans, was given more weight than small business loans which represent 19.7 percent of the bank's lending in the state. The bank

originated 15 small farm loans during the evaluation period, which was insufficient to conduct a meaningful analysis.

<b>Table 3: Lending Activity</b>							<b>2021-2023</b>	
<b>Number of Loans</b>								
<b>Assessment Area</b>	<b>Home Mortgage</b>	<b>Small Business</b>	<b>Small Farm</b>	<b>Community Development</b>	<b>Consumer</b>	<b>Total</b>	<b>% Rating Area Loans</b>	<b>% Rating Area Deposits</b>
WV Non-MSA	1,176	241	13	12	0	1,442	52.49	64.07
Beckley MSA	848	284	2	12	0	1,146	41.52	34.47
Morgantown MSA	140	8	0	1	0	149	5.99	1.46
<b>Total</b>	<b>2,164</b>	<b>533</b>	<b>15</b>	<b>25</b>	<b>0</b>	<b>2,737</b>	<b>100.00</b>	<b>100.00</b>
<b>Dollar Volume of Loans (\$000s)</b>								
<b>Assessment Area</b>	<b>Home Mortgage</b>	<b>Small Business</b>	<b>Small Farm</b>	<b>Community Development</b>	<b>Consumer</b>	<b>Total</b>	<b>% Rating Area Loans</b>	<b>% Rating Area Deposits</b>
WV Non-MSA	135,332	18,596	1,220	2,025	0	157,173	51.68	64.07
Beckley MSA	77,949	32,391	55	3,988	0	114,383	34.68	34.47
Morgantown MSA	34,589	2,323	0	2,000	0	38,912	13.64	1.46
<b>Total</b>	<b>247,870</b>	<b>53,310</b>	<b>1,275</b>	<b>8,013</b>	<b>0</b>	<b>310,468</b>	<b>100.00</b>	<b>100.00</b>
<i>Source: 1/1/2021 - 12/31/2023 Bank Data.</i>								
<i>Due to rounding, totals may not equal 100.0%</i>								

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WEST VIRGINIA**

### **LENDING TEST**

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

### **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank's performance in the WV Non-MSA was good.

### **Lending Activity**

Lending levels reflected good responsiveness to AAs credit needs.

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

Based on 2023 HMDA peer data, CNB ranked first out of 248 lenders, ranking the bank in the top one percent of all mortgage lenders in the AA. The other top mortgage lenders, Vanderbilt Mortgage and Finance, Truist Bank, Rocket Mortgage, and Huntington National Bank had a combined market share of 22.4 percent. The bank's lending performance, relative to the number of mortgage lenders in this AA, is

stronger than the bank's deposit base. The bank was in the top one percent for lending compared to the top 7.4 percent for deposits.

Based on 2023 peer small business loan data, the bank ranked 21 out of 80 lenders, ranking in the top 26.3 percent of all small business lenders. The top five lenders, American Express National Bank, JPMorgan Chase Bank, NA, Synchrony Bank, First Community Bank, and Capital One, NA, had a combined market share of 53.3 percent. The bank's lending performance, relative to the number of small business lenders in this AA, was lower than the bank's deposit base. The bank was in the top 26.3 percent for lending compared to the top 7.4 percent for deposits.

### **Distribution of Loans by Income Level of the Geography**

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

#### ***Home Mortgage Loans***

Refer to Table 7 in the state of West Virginia 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.

Based on the data in the tables and considering the performance context discussed below, the overall geographic distribution of home mortgage loans was good.

#### **2021**

The geographic distribution of home mortgage loans was adequate. The geographic distribution of home mortgage loans in moderate-income CTs was significantly below the percentage of owner-occupied housing units and below the aggregate percentage of all reporting lenders in the AA. There were no low-income CTs in the AA for the evaluation period.

While the bank's lending in moderate-income CT is well below the area demographic characteristics and the aggregate percentage of all reporting lenders in the AA, it is considered adequate given the distance of many of the bank's branches from moderate-income CTs. As previously discussed, many of the bank's branches were not close to moderate-income CTs.

#### **2022-2023**

There are only 0.68 percent of owner-occupied housing units in low-income geographies. Given the limited lending opportunities in low-income geographies, more emphasis was placed on the bank's lending in moderate-income geographies.

The geographic distribution of home mortgage loans was good. The geographic distribution of home mortgage loans in low-income CTs was significantly below the percentage of owner-occupied housing units and was significantly below the aggregate percentage of all reporting lenders in the AA. The geographic distribution of home mortgage loans in moderate-income CTs was near to the percentage of owner-occupied housing units and was near to the aggregate percentage of all reporting lenders in the AA.

***Small Loans to Businesses***

Refer to Table 9 in the state of West Virginia 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.

Based on the data in the tables and considering the performance context discussed below, the overall geographic distribution of small loans to businesses was adequate.

2021

The geographic distribution of small loans to businesses was adequate. The geographic distribution of small loans to businesses in moderate-income CTs was significantly below the percentage of small businesses in those moderate-income CTs and was significantly below the aggregate percentage of all reporting lenders in the AA.

While the bank's lending in moderate-income CT was significantly below the area demographic characteristics and significantly below the aggregate percentage of all reporting lenders in the AA, it is considered adequate given the distance of many of the bank's branches from moderate-income CTs. As previously discussed, many of the bank's branches were not close to moderate-income CTs.

2022-2023

The geographic distribution of small loans to businesses was adequate. The geographic distribution of small loans to businesses in moderate-income CT was significantly below the percentage of small businesses in moderate-income CTs and was significantly below the aggregate percentage of all reporting lenders in the AA.

While the bank's lending in moderate-income census was significantly below demographic characteristics and significantly below the aggregate percentage of all reporting lenders in the AA, it is considered adequate given the distance of many of the bank's branches from moderate-income CTs. As previously discussed, many of the bank's branches were not close to moderate-income CTs.

***Lending Gap Analysis***

The OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of CNB's home mortgage loans and small loans to businesses during the evaluation period. The analysis did not identify any unexplained, conspicuous gaps.

**Distribution of Loans by Income Level of the Borrower**

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

***Home Mortgage Loans***

Refer to Table 8 in the state of West Virginia 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.

Based on the data in the tables, the overall borrower distribution of home mortgage loans was good.

2021

The borrower distribution of home mortgage loans was good. The percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but exceeded the aggregate percentage of reporting lenders in the AA. The percentage of home mortgage loans to moderate-income borrowers was near to the percentage of moderate-income families but exceeded the aggregate percentage of reporting lenders in the AA.

2022-2023

The borrower distribution of home mortgage loans was good. The percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but was near to the aggregate percentage of reporting lenders in the AA. The percentage of home mortgage loans to moderate-income borrowers was near to the percentage of moderate-income families and near to the aggregate percentage of reporting lenders in the AA.

### ***Small Loans to Businesses***

Refer to Table 10 in the state of West Virginia 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.

Based on the data in the tables, the overall borrower distribution of small loans to businesses was excellent.

2021

The borrower distribution of small loans to businesses was excellent. The percentage of small loans to businesses with gross annual revenues of \$1 million or less exceeded the percentage of those businesses and exceeded the aggregate percentage of reporting lenders in the AA.

2022-2023

The borrower distribution of small loans to businesses was excellent. The percentage of small loans to businesses with gross annual revenues of \$1 million or less exceeded the percentage of those businesses and exceeded the aggregate percentage of reporting lenders in the AA.

### **Community Development Lending**

The bank made a relatively high level of CD loans. CD lending had a positive effect on the Lending Test conclusion.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

During the evaluation period, CNB originated 12 CD loans totaling \$2.0 million. CD loans were responsive to community credit needs. The bank's loans provided community development services benefiting low-income and moderate-income individuals and economic development in distressed middle-income CTs.

The following are examples of CD loans the bank originated or purchased in the AA:

- A \$702,375 working capital loan through the SBA PPP program to support operations of a nonprofit organization that provided community services to at-risk youth in the AA.
- A \$649,987 loan to refinance a loan for the construction of a new dining hall facility for a nonprofit organization that provided community services to LMI families.
- A \$200,000 working capital loan for operating expenses for a nonprofit agency that provided health care services to LMI families.

### **Product Innovation and Flexibility**

The bank made adequate use of innovative and/or flexible lending practices in order to serve AA credit needs. The flexible programs were considered in the overall performance and are described in the Description of Institution section.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Refer to Tables 7 through 10 in the state of West Virginia section of appendix D for the facts and data that support the limited-scope conclusions.

Based on limited-scope reviews, the bank's performance under the Lending Test in the Beckley MSA and the Morgantown MSA was consistent with the bank's overall performance under the Lending Test in the full-scope area.

## **INVESTMENT TEST**

The bank's performance under the Investment Test in the state of West Virginia is rated Outstanding.

### **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank's performance in the WV Non-MSA was excellent.

The bank had an excellent level of qualified investments, including grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibited excellent responsiveness to credit and community development needs. The bank rarely used innovative and/or complex investments to support CD initiatives.

Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Beckley MSA	9	2,763	60	1,740	69	30.40	4,503	24.29	2	792
Morgantown MSA	4	1,978	16	8	20	8.81	1,987	10.72	0	0
WV Non-MSA	2	90	130	9,144	132	58.15	9,234	49.81	3	2,041
Broader Statewide or Regional Area	1	1,313	5	1,501	6	2.64	2,814	15.18	3	500
<b>Total</b>	<b>16</b>	<b>6,144</b>	<b>211</b>	<b>12,395</b>	<b>227</b>	<b>100.00</b>	<b>18,537</b>	<b>100.0</b>	<b>8</b>	<b>3,333</b>

\* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

CNB made 132 qualified CD investments and grants totaling \$9.2 million, which is equivalent to 12 percent of allocated tier 1 capital. This consisted of three current period CD investments in LIHTCs, which totaled \$9.0 million, and 127 grants totaling \$107,731. Additionally, the AA benefitted from the ongoing impact of two prior period CD investments with an outstanding balance of \$90,000. The bank also had three unfunded commitments totaling \$2.0 million. The bank's CD investments and grants were responsive to affordable housing needs and community services to LMI individuals in the AA.

During the evaluation period, the bank provided in-kind office space totally \$29,900 to four nonprofit organizations. The in-kind office spaces reduce operating costs which frees up financial resources that can be redirected toward programs, allowing for a greater impact. The organizations can build capacity and serve LMI individuals and families.

The following are examples of qualified investments in the AA:

- \$9,158 in various grants awarded to two regional affiliates of a nationwide organization. These affiliates collaborate with partner agencies and community organizations to improve the lives of individuals, neighborhoods, schools, and workplaces, primarily in LMI areas. A large majority of these grants are part of a match program provided by the bank. An affiliate also receives in-kind office space.
- A \$5,350 grant to a nonprofit foundation with a mission to engage donors and connect them with opportunities to make a lasting impact, build community endowment, provide leadership on key issues, and make grants that reflect the primarily LMI communities. This organization also receives in-kind office space.
- \$1,500 in grants to an organization that provides employment support services for LMI individuals with disabilities. These services range from job readiness training and on-the-job support to employment search assistance and career building services.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on the limited-scope reviews, the bank's performance under the Investment Test in the Beckley MSA and Morgantown MSA were consistent with the bank's overall performance under the Investment Test in the full-scope area.

Broader Statewide

The bank made three current period CD investments which totaled \$1.5 million and two qualified grants totaling \$1,000. Additionally, the bank benefitted from the ongoing impact of a prior period CD investments with an outstanding balance of \$1.3 million.

**SERVICE TEST**

The bank's performance under the Service Test in the state of West Virginia is rated Low Satisfactory.

**Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank's performance in the WV Non-MSA was adequate.

**Retail Banking Services**

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

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
Beckley MSA	34.47	9	33.33	0.00	33.33	55.56	11.11	0.00	0.00	13.83	66.88	19.29	0.00
Morgantown MSA	1.46	1	3.70	0.00	0.00	100.00	0.00	0.00	3.17	12.33	49.61	30.69	4.19
WV Non-MSA	64.07	17	62.96	0.00	17.65	64.71	17.65	0.00	1.00	17.09	56.38	25.53	0.00
<b>Total</b>	<b>100.0</b>	<b>27</b>	<b>100.0</b>	<b>0.00</b>	<b>22.22</b>	<b>62.96</b>	<b>14.81</b>	<b>0.00</b>	<b>1.25</b>	<b>15.19</b>	<b>57.44</b>	<b>25.16</b>	<b>0.96</b>

*Source: FFIEC File - 2020 Census  
1/1/2022 - 12/31/2023 Bank Data  
Due to rounding, totals may not equal 100.0%*

\* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

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

CNB had 17 branches in the AA, with three located in a moderate-income geography. The bank's distribution of branches in moderate-income geographies was near to the percentage of the population living within those geographies. There were no low-income geographies in the AA.

Services, including where appropriate, business hours did not vary in a way that inconvenienced the various portions of its AA, particularly LMI geographies and/or individuals. The bank maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. The bank had several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The OCC did not place significant emphasis on these

alternative delivery systems, as the bank did not maintain metrics to demonstrate how effectively these channels helped meet the credit needs of low- and moderate-income individuals.

### **Community Development Services**

The bank provided a relatively high level of CD services.

CD services were effective and responsive in helping the bank address community needs, consistent with its capacity and expertise to conduct specific activities.

During the evaluation period, 27 bank employees from various lines of businesses collectively provided a total of 939 hours in support of 34 organizations. This total includes the efforts of bank employees who spent over 872 hours serving on boards and committees for 17 different organizations. Within these totals, bank employees conducted financial education events, contributing 67 hours in coordination with 16 different schools and organizations.

The following are examples of qualified activities in the AA:

- Two employees contributed 120 hours of technical service to a nonprofit developer in support of an application towards the Federal Home Loan Bank's Affordable Housing Program (AHP). The developer intends to build a four-unit independent-living apartment building designed to serve low-income senior citizens.
- An employee served 96 hours as a board member to a nonprofit organization. The nonprofit offers immediate emergency disaster services, food, clothing, and shelter to low-income families and the homeless.
- An employee served 72 hours as a board member to a nonprofit organization that advocates for the best interest of abused, neglected and abandoned children who are under the care of the juvenile court. Most of these children are from low- income families. As noted in the Investment Test section for the AA, the bank also provided a grant to the organization.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on the limited-scope review, the bank's performance under the Service Test in the Beckley MSA was stronger than the bank's overall performance under the Service Test in the full-scope area. In the Beckley MSA, the service delivery systems were readily accessible to geographies and individuals of different income levels in the AA. There were 17 bank employees from various lines of businesses in the bank who collectively provided 26 hours in support of financial literacy for students of six schools in the AA, and six bank employees provided 268 hours to CD organizations.

Based on the limited scope review, the bank's performance under the Service Test in the Morgantown MSA, was weaker than the bank's performance under the Service Test in the full-scope area. In the Morgantown MSA, the service delivery systems were reasonably accessible to portions of the AA, particularly LMI geographies and/or LMI individuals. There were two bank employees that provided 29 hours to CD organizations.

The performance had a neutral impact on the bank's overall Service Test performance rating for the state.

## 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”.

<b>Time Period Reviewed:</b>	01/01/2021 – 12/31/2023	
<b>Bank Products Reviewed:</b>	Home Mortgage, Small Business, Small Farm Loans Community Development Loans, Qualified Investments, Community Development Services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None	NA	NA
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>MMSA(s)</b>		
Charleston-Huntington-Ashland, WV-OH-KY Combined Statistical Area (Charleston CSA)	Full scope	Counties of Kanawha, Clay, Boone, Jackson, Lincoln, Cabell, Wayne, and Putnam in West Virginia; Lawrence County in Ohio; Counties of Boyd, Greenup, and Carter in Kentucky
Washington-Baltimore-Arlington, DC-MD-WV Combined Statistical Area (Washington CSA)	Full scope	Counties of Warren, and Fredrick, and the City of Winchester in Virginia; Counties of Berkeley, Jefferson, and Morgan in West Virginia
<b>Kentucky</b>		
Kentucky Non-MSA (KY Non-MSA)	Full scope	Counties of Franklin, Harrison, Johnson, Lawrence, Montgomery, and Nicholas
Lexington-Fayette MSA (Lexington MSA)	Limited scope	Counties of Fayette, Jessamine, and Woodford
<b>Ohio</b>		
Columbus OH MSA	Full scope	Franklin County
<b>Virginia</b>		
Staunton VA MSA (Staunton MSA)	Full scope	Augusta County, and Cities of Staunton, and Waynesboro
Virginia Non-MSA (VA Non-MSA)	Limited scope	Cities of Buena Vista and Lexington and Counties of Rockbridge and Shenandoah
<b>West Virginia</b>		
West Virginia Non-MSA (WV Non-MSA)	Full scope	Counties of Braxton, Greenbrier, Harrison, Mason, Mercer, Nicholas, Pocahontas, and Summers
Beckley WV MSA (Beckley MSA)	Limited scope	Counties of Fayette and Raleigh
Morgantown WV MSA (Morgantown MSA)	Limited scope	Monongalia County

## Appendix B: Summary of MMSA and State Ratings

<b>RATINGS</b>				
<b>Overall Bank:</b>	<b>Lending Test Rating*</b>	<b>Investment Test Rating</b>	<b>Service Test Rating</b>	<b>Overall Bank/State/Multistate Rating</b>
<b>City National Bank of West Virginia</b>	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
<b>MMSA or State:</b>				
Charleston CSA	High Satisfactory	Low Satisfactory	Outstanding	Satisfactory
Washington CSA	High Satisfactory	High Satisfactory	Outstanding	Satisfactory
Kentucky	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Ohio	Low Satisfactory	High Satisfactory	Needs to Improve	Low Satisfactory
Virginia	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
West Virginia	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory

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

## Appendix C: Definitions and Common Abbreviations

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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 12 CFR 1003.2 of this title, and that is not an excluded transaction under 12 CFR 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 CD loans and qualified investments, branch distribution, and CD services).

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

**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.

**Multistate Metropolitan Statistical Area (MMSA):** 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.

**Prior Period Investments:** Investments made in a previous evaluation period that are outstanding as of the end of the evaluation period.

**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 multistate 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 multistate metropolitan statistical area, the institution will receive a rating for the multistate 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.

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

**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

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### 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/AA. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> 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 7. 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 8. 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/AA. The table also presents aggregate peer data for the years the data is available.
- Table 9. 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 AA.
- Table 10. 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 11. 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 AA.

**Table 12. 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 \$500,000) 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.

Charleston CSA

Table 7: 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 Number	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 CSA	1,329	162,307	100.00	17,626	1.67	1.28	1.36	13.76	9.41	9.15	60.13	54.40	55.49	24.43	34.84	33.94	0.01	0.08	0.06
<b>Total</b>	<b>1,329</b>	<b>162,307</b>	<b>100.00</b>	<b>17,626</b>	<b>1.67</b>	<b>1.28</b>	<b>1.36</b>	<b>13.76</b>	<b>9.41</b>	<b>9.15</b>	<b>60.13</b>	<b>54.40</b>	<b>55.49</b>	<b>24.43</b>	<b>34.84</b>	<b>33.94</b>	<b>0.01</b>	<b>0.08</b>	<b>0.06</b>

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	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 CSA	2,561	286,250	100.00	22,470	1.24	0.59	0.94	15.56	8.59	12.54	59.03	57.63	59.01	23.41	32.68	26.99	0.76	0.51	0.53
<b>Total</b>	<b>2,561</b>	<b>286,250</b>	<b>100.00</b>	<b>22,470</b>	<b>1.24</b>	<b>0.59</b>	<b>0.94</b>	<b>15.56</b>	<b>8.59</b>	<b>12.54</b>	<b>59.03</b>	<b>57.63</b>	<b>59.01</b>	<b>23.41</b>	<b>32.68</b>	<b>26.99</b>	<b>0.76</b>	<b>0.51</b>	<b>0.53</b>

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 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 Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Charleston CSA	1,329	162,307	100.00	17,626	22.13	5.64	6.79	16.99	16.25	15.99	19.68	23.10	20.90	41.21	51.77	39.83	--	3.24	16.49
<b>Total</b>	<b>1,329</b>	<b>162,307</b>	<b>100.00</b>	<b>17,626</b>	<b>22.13</b>	<b>5.64</b>	<b>6.79</b>	<b>16.99</b>	<b>16.25</b>	<b>15.99</b>	<b>19.68</b>	<b>23.10</b>	<b>20.90</b>	<b>41.21</b>	<b>51.77</b>	<b>39.83</b>	<b>--</b>	<b>3.24</b>	<b>16.49</b>

*Source: FFIEC File - 2010 Census; 1/1/2021 - 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 Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Charleston CSA	2,561	286,250	100.00	22,470	22.85	6.21	7.89	16.29	18.94	20.16	20.66	23.86	23.10	40.20	47.72	35.09	--	3.28	13.76
<b>Total</b>	<b>2,561</b>	<b>286,250</b>	<b>100.00</b>	<b>22,470</b>	<b>22.85</b>	<b>6.21</b>	<b>7.89</b>	<b>16.29</b>	<b>18.94</b>	<b>20.16</b>	<b>20.66</b>	<b>23.86</b>	<b>23.10</b>	<b>40.20</b>	<b>47.72</b>	<b>35.09</b>	<b>--</b>	<b>3.28</b>	<b>13.76</b>

*Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Charleston CSA	497	43,643	100.00	8,561	5.81	3.42	5.95	13.15	12.07	11.81	54.06	53.72	54.39	26.79	30.78	27.71	0.20	--	0.15
<b>Total</b>	<b>497</b>	<b>43,643</b>	<b>100.00</b>	<b>8,561</b>	<b>5.81</b>	<b>3.42</b>	<b>5.95</b>	<b>13.15</b>	<b>12.07</b>	<b>11.81</b>	<b>54.06</b>	<b>53.72</b>	<b>54.39</b>	<b>26.79</b>	<b>30.78</b>	<b>27.71</b>	<b>0.20</b>	<b>--</b>	<b>0.15</b>

*Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 Dunn & Bradstreet SBSF Demographics, 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023
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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Charleston CSA	283	50,084	100.00	14,967	4.34	3.53	4.16	17.58	13.78	15.37	49.15	53.00	51.19	28.39	29.68	28.66	0.53	--	0.62
<b>Total</b>	<b>283</b>	<b>50,084</b>	<b>100.00</b>	<b>14,967</b>	<b>4.34</b>	<b>3.53</b>	<b>4.16</b>	<b>17.58</b>	<b>13.78</b>	<b>15.37</b>	<b>49.15</b>	<b>53.00</b>	<b>51.19</b>	<b>28.39</b>	<b>29.68</b>	<b>28.66</b>	<b>0.53</b>	<b>--</b>	<b>0.62</b>

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table 10: 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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Charleston CSA	497	43,643	100.00	8,561	77.05	82.09	47.55	10.30	17.91	12.66	--	
<b>Total</b>	<b>497</b>	<b>43,643</b>	<b>100.00</b>	<b>8,561</b>	<b>77.05</b>	<b>82.09</b>	<b>47.55</b>	<b>10.30</b>	<b>17.91</b>	<b>12.66</b>	<b>--</b>	

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 Dunn & Bradstreet SBSF Demographics, 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Charleston CSA	283	50,084	100.00	14,967	74.05	62.54	53.76	11.10	37.10	14.85	0.35	
<b>Total</b>	<b>283</b>	<b>50,084</b>	<b>100.00</b>	<b>14,967</b>	<b>74.05</b>	<b>62.54</b>	<b>53.76</b>	<b>11.10</b>	<b>37.10</b>	<b>14.85</b>	<b>0.35</b>	

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Washington CSA

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	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 CSA	446	66,929	100.00	27,732	2.63	5.38	2.90	24.40	22.65	21.38	59.73	62.33	61.97	13.24	9.64	13.75	--	--	--
<b>Total</b>	<b>446</b>	<b>66,929</b>	<b>100.00</b>	<b>27,732</b>	<b>2.63</b>	<b>5.38</b>	<b>2.90</b>	<b>24.40</b>	<b>22.65</b>	<b>21.38</b>	<b>59.73</b>	<b>62.33</b>	<b>61.97</b>	<b>13.24</b>	<b>9.64</b>	<b>13.75</b>	<b>--</b>	<b>--</b>	<b>--</b>

*Source: FFIEC File - 2010 Census; 1/1/2021 - 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 Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	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 CSA	970	140,519	100.00	28,164	2.97	2.99	3.23	26.63	27.73	27.18	53.66	52.99	51.83	16.75	16.29	17.76	--	--	--
<b>Total</b>	<b>970</b>	<b>140,519</b>	<b>100.00</b>	<b>28,164</b>	<b>2.97</b>	<b>2.99</b>	<b>3.23</b>	<b>26.63</b>	<b>27.73</b>	<b>27.18</b>	<b>53.66</b>	<b>52.99</b>	<b>51.83</b>	<b>16.75</b>	<b>16.29</b>	<b>17.76</b>	<b>--</b>	<b>--</b>	<b>--</b>

*Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 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 Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Washington CSA	446	66,929	100.00	27,732	24.20	9.42	10.37	18.86	20.63	19.03	21.28	22.42	21.36	35.66	41.26	27.19	--	6.28	22.05
<b>Total</b>	<b>446</b>	<b>66,929</b>	<b>100.00</b>	<b>27,732</b>	<b>24.20</b>	<b>9.42</b>	<b>10.37</b>	<b>18.86</b>	<b>20.63</b>	<b>19.03</b>	<b>21.28</b>	<b>22.42</b>	<b>21.36</b>	<b>35.66</b>	<b>41.26</b>	<b>27.19</b>	<b>--</b>	<b>6.28</b>	<b>22.05</b>

*Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022-2023		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate		
Washington CSA	970	140,519	100.00	28,164	22.49	11.03	9.29	19.63	18.87	21.16	23.41	29.18	22.41	34.48	35.05	27.19	--	5.88	19.95		
<b>Total</b>	<b>970</b>	<b>140,519</b>	<b>100.00</b>	<b>28,164</b>	<b>22.49</b>	<b>11.03</b>	<b>9.29</b>	<b>19.63</b>	<b>18.87</b>	<b>21.16</b>	<b>23.41</b>	<b>29.18</b>	<b>22.41</b>	<b>34.48</b>	<b>35.05</b>	<b>27.19</b>	<b>--</b>	<b>5.88</b>	<b>19.95</b>		

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table 9: 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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate		
Washington CSA	103	5,469	100.00	6,595	3.60	12.62	3.49	29.37	38.83	28.29	54.00	35.92	55.21	13.03	12.62	13.01	--	--	--		
<b>Total</b>	<b>103</b>	<b>5,469</b>	<b>100.00</b>	<b>6,595</b>	<b>3.60</b>	<b>12.62</b>	<b>3.49</b>	<b>29.37</b>	<b>38.83</b>	<b>28.29</b>	<b>54.00</b>	<b>35.92</b>	<b>55.21</b>	<b>13.03</b>	<b>12.62</b>	<b>13.01</b>	<b>--</b>	<b>--</b>	<b>--</b>		

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 Dunn & Bradstreet SBSF Demographics, 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023		
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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate		
Washington CSA	61	9,723	100.00	12,720	7.63	11.48	5.73	25.75	21.31	25.74	50.03	47.54	51.56	16.60	19.67	16.97	--	--	--		
<b>Total</b>	<b>61</b>	<b>9,723</b>	<b>100.00</b>	<b>12,720</b>	<b>7.63</b>	<b>11.48</b>	<b>5.73</b>	<b>25.75</b>	<b>21.31</b>	<b>25.74</b>	<b>50.03</b>	<b>47.54</b>	<b>51.56</b>	<b>16.60</b>	<b>19.67</b>	<b>16.97</b>	<b>--</b>	<b>--</b>	<b>--</b>		

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table 10: 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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Washington CSA	103	5,469	100.00	6,595	84.92	92.23	47.90	7.17	7.77	7.91	--
<b>Total</b>	<b>103</b>	<b>5,469</b>	<b>100.00</b>	<b>6,595</b>	<b>84.92</b>	<b>92.23</b>	<b>47.90</b>	<b>7.17</b>	<b>7.77</b>	<b>7.91</b>	<b>--</b>

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 Dunn & Bradstreet SBSF Demographics, 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Washington CSA	61	9,723	100.00	12,720	82.45	95.08	53.49	8.38	4.92	9.17	--
<b>Total</b>	<b>61</b>	<b>9,723</b>	<b>100.00</b>	<b>12,720</b>	<b>82.45</b>	<b>95.08</b>	<b>53.49</b>	<b>8.38</b>	<b>4.92</b>	<b>9.17</b>	<b>--</b>

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

State of Kentucky

Table 7: 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 Number	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	
KY Non-MSA	101	10,140	51.27	2,750	--	--	--	--	--	--	90.31	85.15	85.42	9.69	14.85	14.58	--	--	--	
Lexington MSA	96	21,894	48.73	21,071	5.37	5.21	3.85	20.82	26.04	20.26	35.29	42.71	32.73	38.52	26.04	43.15	--	--	--	
<b>Total</b>	<b>197</b>	<b>32,034</b>	<b>100.00</b>	<b>23,821</b>	<b>4.09</b>	<b>2.54</b>	<b>3.41</b>	<b>15.87</b>	<b>12.69</b>	<b>17.93</b>	<b>48.36</b>	<b>64.47</b>	<b>38.81</b>	<b>31.67</b>	<b>20.30</b>	<b>39.85</b>	<b>--</b>	<b>--</b>	<b>--</b>	

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

Table 7: 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 Number	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	
KY Non-MSA	97	11,900	56.40	2,133	--	--	--	16.63	18.56	9.66	62.64	62.89	66.29	20.74	18.56	24.05	--	--	--	
Lexington MSA	75	13,542	43.60	11,890	3.64	6.67	4.04	18.05	10.67	16.53	38.04	48.00	41.15	39.79	34.67	37.52	0.49	--	0.76	
<b>Total</b>	<b>172</b>	<b>25,442</b>	<b>100.00</b>	<b>14,023</b>	<b>2.82</b>	<b>2.91</b>	<b>3.42</b>	<b>17.73</b>	<b>15.12</b>	<b>15.49</b>	<b>43.59</b>	<b>56.40</b>	<b>44.98</b>	<b>35.48</b>	<b>25.58</b>	<b>35.47</b>	<b>0.38</b>	<b>--</b>	<b>0.64</b>	

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

**Table 7: 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 Number	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
KY Non-MSA	114	14,693	43.51	2,823	--	--	--	13.35	17.54	8.57	48.76	59.65	49.20	37.90	22.81	42.22	--	--	--
Lexington MSA	148	23,434	56.49	8,616	3.35	2.70	4.16	17.32	12.84	16.36	39.42	45.95	41.86	39.46	38.51	37.16	0.45	--	0.45
<b>Total</b>	<b>262</b>	<b>38,127</b>	<b>100.00</b>	<b>11,439</b>	<b>2.37</b>	<b>1.53</b>	<b>3.13</b>	<b>16.16</b>	<b>14.89</b>	<b>14.44</b>	<b>42.16</b>	<b>51.91</b>	<b>43.68</b>	<b>39.00</b>	<b>31.68</b>	<b>38.41</b>	<b>0.32</b>	<b>--</b>	<b>0.34</b>

Source: FFIEC File - 2020 Census; 1/1/2023 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table 8: 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 Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
KY Non-MSA	101	10,140	51.27	2,750	24.36	3.96	4.18	16.14	17.82	14.11	17.94	14.85	19.75	41.56	58.42	42.51	--	4.95	19.45
Lexington MSA	96	21,894	48.73	21,071	24.10	3.13	7.74	16.04	11.46	18.27	18.50	17.71	19.44	41.36	46.88	39.33	--	20.83	15.22
<b>Total</b>	<b>197</b>	<b>32,034</b>	<b>100.00</b>	<b>23,821</b>	<b>24.15</b>	<b>3.55</b>	<b>7.33</b>	<b>16.06</b>	<b>14.72</b>	<b>17.79</b>	<b>18.38</b>	<b>16.24</b>	<b>19.48</b>	<b>41.41</b>	<b>52.79</b>	<b>39.70</b>	<b>--</b>	<b>12.69</b>	<b>15.71</b>

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table 8: 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 Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
KY Non-MSA	97	11,900	56.40	2,133	23.14	10.31	4.45	17.29	11.34	18.71	18.10	27.84	23.72	41.48	49.48	38.07	--	1.03	15.05
Lexington MSA	75	13,542	43.60	11,890	22.34	8.00	8.26	16.42	18.67	18.70	19.65	21.33	20.40	41.60	37.33	37.83	--	14.67	14.81
<b>Total</b>	<b>172</b>	<b>25,442</b>	<b>100.00</b>	<b>14,023</b>	<b>22.51</b>	<b>9.30</b>	<b>7.68</b>	<b>16.61</b>	<b>14.53</b>	<b>18.70</b>	<b>19.31</b>	<b>25.00</b>	<b>20.91</b>	<b>41.57</b>	<b>44.19</b>	<b>37.87</b>	<b>--</b>	<b>6.98</b>	<b>14.85</b>

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table 8: 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 Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
KY Non-MSA	114	14,693	43.51	2,823	19.28	7.02	4.18	15.54	13.16	13.21	17.97	23.68	24.76	47.22	42.98	42.76	--	13.16	15.09
Lexington MSA	148	23,434	56.49	8,616	22.28	8.78	7.81	16.31	19.59	17.75	19.70	26.35	20.58	41.70	31.08	38.56	--	14.19	15.31
<b>Total</b>	<b>262</b>	<b>38,127</b>	<b>100.00</b>	<b>11,439</b>	<b>21.42</b>	<b>8.02</b>	<b>6.91</b>	<b>16.09</b>	<b>16.79</b>	<b>16.63</b>	<b>19.21</b>	<b>25.19</b>	<b>21.61</b>	<b>43.28</b>	<b>36.26</b>	<b>29.59</b>	<b>--</b>	<b>13.74</b>	<b>15.25</b>

Source: FFIEC File - 2020 Census; 1/1/2023 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

**Table 9: 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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
KY Non-MSA	216	9,226	68.35	1,740	--	--	--	--	--	--	86.93	92.59	88.05	13.07	7.41	11.95	--	--	--
Lexington MSA	100	14,670	31.65	10,232	6.67	3.00	6.46	19.21	24.00	20.12	38.85	56.00	38.84	35.27	17.00	34.58	--	--	--
<b>Total</b>	<b>316</b>	<b>23,896</b>	<b>100.00</b>	<b>11,972</b>	<b>5.90</b>	<b>0.95</b>	<b>5.52</b>	<b>16.98</b>	<b>7.59</b>	<b>17.20</b>	<b>44.43</b>	<b>81.01</b>	<b>45.99</b>	<b>32.69</b>	<b>10.44</b>	<b>31.29</b>	<b>--</b>	<b>--</b>	<b>--</b>

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 Dunn & Bradstreet SBSF Demographics, 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

**Table 9: 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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
KY Non-MSA	32	3,711	41.03	1,307	--	--	--	11.66	50.00	17.75	65.60	40.63	61.36	22.74	9.38	20.89	--	--	--
Lexington MSA	46	12,815	58.97	9,318	4.15	4.35	5.18	17.43	21.74	16.67	34.25	58.70	36.65	37.70	13.04	36.72	6.47	2.17	4.78
<b>Total</b>	<b>78</b>	<b>16,526</b>	<b>100.00</b>	<b>10,625</b>	<b>3.78</b>	<b>2.56</b>	<b>4.55</b>	<b>16.92</b>	<b>33.33</b>	<b>16.80</b>	<b>37.02</b>	<b>51.28</b>	<b>39.69</b>	<b>36.38</b>	<b>11.54</b>	<b>34.78</b>	<b>5.90</b>	<b>1.28</b>	<b>4.19</b>

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2022 Bank Data, 2022 Dunn & Bradstreet SBSF Demographics, 2022 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

**Table 9: 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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
KY Non-MSA	38	6,174	35.19	1,977	--	--	--	19.96	21.05	14.67	41.86	57.89	45.42	38.19	21.05	39.91	--	--	--
Lexington MSA	70	15,103	64.81	9,601	4.66	4.29	4.20	17.22	10.00	15.58	35.88	55.71	38.42	36.30	18.57	36.90	5.94	11.43	4.90
<b>Total</b>	<b>108</b>	<b>21,277</b>	<b>100.00</b>	<b>11,578</b>	<b>3.76</b>	<b>2.78</b>	<b>3.48</b>	<b>17.75</b>	<b>13.89</b>	<b>15.43</b>	<b>37.03</b>	<b>56.48</b>	<b>39.62</b>	<b>36.66</b>	<b>19.44</b>	<b>37.42</b>	<b>4.80</b>	<b>7.41</b>	<b>4.06</b>

Source: FFIEC File - 2020 Census; 1/1/2023 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2023 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table 10: 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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
KY Non-MSA	216	9,226	68.35	1,740	79.40	91.20	56.09	8.62	8.80	11.98	--
Lexington MSA	100	14,670	31.65	10,232	82.55	74.00	48.99	8.69	26.00	8.77	--
<b>Total</b>	<b>316</b>	<b>23,896</b>	<b>100.00</b>	<b>11,972</b>	<b>82.18</b>	<b>85.76</b>	<b>50.03</b>	<b>8.68</b>	<b>14.24</b>	<b>9.14</b>	<b>--</b>

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 Dunn & Bradstreet SBSF Demographics, 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table 10: 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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
KY Non-MSA	32	3,711	41.03	1,307	76.74	71.88	58.61	10.06	28.13	13.20	--
Lexington MSA	46	12,815	58.97	9,318	78.96	50.00	50.54	10.39	50.00	10.65	--
<b>Total</b>	<b>78</b>	<b>16,526</b>	<b>100.00</b>	<b>10,625</b>	<b>78.77</b>	<b>58.97</b>	<b>51.53</b>	<b>10.36</b>	<b>41.03</b>	<b>10.87</b>	<b>--</b>

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2022 Bank Data, 2022 Dunn & Bradstreet SBSF Demographics, 2022 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table 10: 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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
KY Non-MSA	38	6,174	35.19	1,977	73.88	57.89	59.74	9.77	42.11	16.35	--
Lexington MSA	70	15,103	64.81	9,601	81.49	61.43	53.35	9.30	37.14	9.20	1.43
<b>Total</b>	<b>108</b>	<b>21,277</b>	<b>100.00</b>	<b>11,578</b>	<b>80.02</b>	<b>60.19</b>	<b>54.44</b>	<b>9.39</b>	<b>38.89</b>	<b>10.58</b>	<b>0.93</b>

Source: FFIEC File - 2020 Census; 1/1/2023 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2023 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table 11: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2021
Assessment Area:	Total Loans to Farm				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate
KY Non-MSA	23	1,016	88.46	208	--	--	--	--	--	--	88.93	100.00	93.75	11.07	--	6.25	--	--	--
Lexington MSA	3	50	11.54	196	6.51	--	1.53	15.02	33.33	11.22	40.86	66.67	49.49	37.61	--	37.76	--	--	--
<b>Total</b>	<b>26</b>	<b>1,066</b>	<b>100.00</b>	<b>404</b>	<b>5.28</b>	<b>--</b>	<b>0.74</b>	<b>12.18</b>	<b>3.85</b>	<b>5.45</b>	<b>49.96</b>	<b>96.15</b>	<b>72.28</b>	<b>32.58</b>	<b>--</b>	<b>21.53</b>	<b>--</b>	<b>--</b>	<b>--</b>

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 Dunn & Bradstreet SBSF Demographics, 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table 11: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022
Assessment Area:	Total Loans to Farm				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate
KY Non-MSA	28	1,272	90.32	172	--	--	--	4.40	--	4.65	61.54	92.86	70.93	34.07	7.14	24.42	--	--	--
Lexington MSA	3	408	9.68	169	2.43	--	2.96	11.21	--	8.28	42.77	100.00	43.20	40.00	--	40.24	3.58	--	5.33
<b>Total</b>	<b>31</b>	<b>1,680</b>	<b>100.00</b>	<b>341</b>	<b>2.01</b>	<b>--</b>	<b>1.47</b>	<b>10.03</b>	<b>--</b>	<b>6.45</b>	<b>46.04</b>	<b>93.55</b>	<b>57.18</b>	<b>38.97</b>	<b>6.45</b>	<b>32.26</b>	<b>2.96</b>	<b>--</b>	<b>2.64</b>

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2022 Bank Data, 2022 Dunn & Bradstreet SBSF Demographics, 2022 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table 11: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2023
Assessment Area:	Total Loans to Farm				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate
KY Non-MSA	33	2,459	75.00	163	--	--	--	4.91	--	6.13	49.69	87.88	57.67	45.40	12.12	36.20	--	--	--
Lexington MSA	11	1,480	25.00	192	2.72	9.09	2.60	10.97	--	4.69	46.34	81.82	52.08	36.65	9.09	37.50	3.32	--	3.13
<b>Total</b>	<b>44</b>	<b>3,939</b>	<b>100.00</b>	<b>355</b>	<b>2.13</b>	<b>2.27</b>	<b>1.41</b>	<b>9.65</b>	<b>--</b>	<b>5.35</b>	<b>47.07</b>	<b>86.36</b>	<b>54.65</b>	<b>38.55</b>	<b>11.36</b>	<b>36.90</b>	<b>2.60</b>	<b>--</b>	<b>1.69</b>

Source: FFIEC File - 2020 Census; 1/1/2023 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2023 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table 12: Assessment Area Distribution of Loans to Farms by Gross Annual Revenue											2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
KY Non-MSA	23	1,016	88.46	208	95.90	100.00	52.40	4.10	--	--	--
Lexington MSA	3	50	11.54	196	91.96	100.00	64.80	6.51	--	1.53	--
<b>Total</b>	<b>26</b>	<b>1,066</b>	<b>100.00</b>	<b>404</b>	<b>92.71</b>	<b>100.00</b>	<b>58.42</b>	<b>6.05</b>	<b>--</b>	<b>1.24</b>	<b>--</b>

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 Dunn & Bradstreet SBSF Demographics, 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table 12: Assessment Area Distribution of Loans to Farms by Gross Annual Revenue											2022
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
KY Non-MSA	28	1,272	90.32	172	96.15	96.43	62.79	3.85	--	--	3.57
Lexington MSA	3	408	9.68	169	88.67	100.00	66.27	9.83	--	1.50	--
<b>Total</b>	<b>31</b>	<b>1,680</b>	<b>100.00</b>	<b>341</b>	<b>89.97</b>	<b>96.77</b>	<b>64.52</b>	<b>8.79</b>	<b>--</b>	<b>1.24</b>	<b>3.23</b>

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2022 Bank Data, 2022 Dunn & Bradstreet SBSF Demographics, 2022 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table 12: Assessment Area Distribution of Loans to Farms by Gross Annual Revenue											2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
KY Non-MSA	33	2,459	75.00	163	96.32	100.00	64.42	2.76	--	0.92	--
Lexington MSA	11	1,480	25.00	192	90.22	100.00	66.67	8.25	--	1.53	--
<b>Total</b>	<b>44</b>	<b>3,939</b>	<b>100.00</b>	<b>355</b>	<b>91.54</b>	<b>100.00</b>	<b>65.63</b>	<b>7.06</b>	<b>--</b>	<b>1.40</b>	<b>--</b>

Source: FFIEC File - 2020 Census; 1/1/2023 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2023 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

State of Ohio

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	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
Columbus MSA	140	100.00	2,095	--	--	--	--	--	--	20.33	100.00	17.61	79.67	--	82.39	--	--	--	
<b>Total</b>	<b>140</b>	<b>100.00</b>	<b>2,095</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>20.33</b>	<b>100.00</b>	<b>17.61</b>	<b>79.67</b>	<b>--</b>	<b>82.39</b>	<b>--</b>	<b>--</b>	<b>--</b>	

*Source: FFIEC File - 2010 Census; 1/1/2021 - 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 Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	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
Columbus MSA	208,421	100.00	71,099	7.13	15.00	9.34	18.36	15.00	18.66	37.20	25.00	37.95	36.91	45.00	33.25	0.40	--	0.79	
<b>Total</b>	<b>208,421</b>	<b>100.00</b>	<b>71,099</b>	<b>7.13</b>	<b>15.00</b>	<b>9.34</b>	<b>18.36</b>	<b>15.00</b>	<b>18.66</b>	<b>37.20</b>	<b>25.00</b>	<b>37.95</b>	<b>36.91</b>	<b>45.00</b>	<b>33.25</b>	<b>0.40</b>	<b>--</b>	<b>0.79</b>	

*Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 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 Number	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Columbus MSA	140	100.00	2,095	7.93	100.00	2.43	12.92	--	12.55	14.55	--	19.86	64.60	--	54.08	--	--	11.07
<b>Total</b>	<b>140</b>	<b>100.00</b>	<b>2,095</b>	<b>7.93</b>	<b>100.00</b>	<b>2.43</b>	<b>12.92</b>	<b>--</b>	<b>12.55</b>	<b>14.55</b>	<b>--</b>	<b>19.86</b>	<b>64.60</b>	<b>--</b>	<b>54.08</b>	<b>--</b>	<b>--</b>	<b>11.07</b>

*Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022-2023		
Assessment Area:	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers					
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate		
Columbus MSA	20	8,421	100.00	71,099	24.68	--	9.74	17.90	20.00	21.26	20.28	15.00	21.14	37.14	50.00	32.00	--	15.00	15.87		
<b>Total</b>	<b>20</b>	<b>8,421</b>	<b>100.00</b>	<b>71,099</b>	<b>24.68</b>	<b>--</b>	<b>9.74</b>	<b>17.90</b>	<b>20.00</b>	<b>21.26</b>	<b>20.28</b>	<b>15.00</b>	<b>21.14</b>	<b>37.14</b>	<b>50.00</b>	<b>32.00</b>	<b>--</b>	<b>15.00</b>	<b>15.87</b>		

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table 9: 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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate		
Columbus MSA	0	0	0.00	971	--	--	--	--	--	--	14.72	--	14.83	85.28	--	85.17	--	--	--		
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0.00</b>	<b>971</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>14.72</b>	<b>--</b>	<b>14.83</b>	<b>85.28</b>	<b>--</b>	<b>85.17</b>	<b>--</b>	<b>--</b>	<b>--</b>		

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 Dunn & Bradstreet SBSF Demographics, 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023		
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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate		
Columbus MSA	1	300	100.00	58,527	11.78	100.00	10.01	19.71	--	16.72	32.08	--	32.95	34.78	--	39.18	1.65	--	1.14		
<b>Total</b>	<b>1</b>	<b>300</b>	<b>100.00</b>	<b>58,527</b>	<b>11.78</b>	<b>100.00</b>	<b>10.01</b>	<b>19.71</b>	<b>--</b>	<b>16.72</b>	<b>32.08</b>	<b>--</b>	<b>32.95</b>	<b>34.78</b>	<b>--</b>	<b>39.18</b>	<b>1.65</b>	<b>--</b>	<b>1.14</b>		

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table 10: 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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Columbus MSA	0	0	0.00	971	79.78	--	44.90	12.19	--	8.03	--
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0.00</b>	<b>971</b>	<b>79.78</b>	<b>--</b>	<b>44.90</b>	<b>12.19</b>	<b>--</b>	<b>8.03</b>	<b>--</b>

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 Dunn & Bradstreet SBSF Demographics, 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues										2022-2023	
Assessment Area:	Total Loans to Small Businesses			Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Columbus MSA	1	300	100.00	58,527	82.86	--	53.28	8.48	100.00	8.66	--
<b>Total</b>	<b>1</b>	<b>300</b>	<b>100.00</b>	<b>58,527</b>	<b>82.86</b>	<b>--</b>	<b>53.28</b>	<b>8.48</b>	<b>100.00</b>	<b>8.66</b>	<b>--</b>

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

State of Virginia

Table 7: 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 Number	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	
Staunton MSA	143	26,943	65.60	7,071	0.25	1.40	0.38	9.20	6.29	10.97	83.15	81.12	80.43	7.41	11.19	8.22	--	--	--	
VA Non-MSA	75	10,656	34.40	4,276	--	--	--	7.33	6.67	5.66	57.30	60.00	53.20	35.37	33.33	41.14	--	--	--	
<b>Total</b>	<b>218</b>	<b>37,599</b>	<b>100.00</b>	<b>11,347</b>	<b>0.15</b>	<b>0.92</b>	<b>0.24</b>	<b>8.46</b>	<b>6.42</b>	<b>8.97</b>	<b>72.92</b>	<b>73.85</b>	<b>70.17</b>	<b>18.47</b>	<b>18.81</b>	<b>20.62</b>	<b>--</b>	<b>--</b>	<b>--</b>	

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2022-2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total Number	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	
Staunton MSA	316	49,186	69.91	7,818	--	--	--	12.04	13.29	17.61	74.58	72.47	70.01	13.39	14.24	12.34	--	--	--	
VA Non-MSA	136	14,928	30.09	4,523	--	--	--	2.79	2.21	2.81	64.88	71.32	66.53	32.33	26.47	30.58	--	--	0.02	
<b>Total</b>	<b>452</b>	<b>64,114</b>	<b>100.00</b>	<b>12,341</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>8.52</b>	<b>9.96</b>	<b>12.19</b>	<b>70.89</b>	<b>72.12</b>	<b>68.73</b>	<b>20.59</b>	<b>17.92</b>	<b>19.03</b>	<b>--</b>	<b>--</b>	<b>0.01</b>	

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

**Table 8: 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 Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Staunton MSA	143	26,943	65.60	7,071	19.70	9.09	7.95	18.35	16.08	21.69	22.71	27.97	24.37	39.23	39.16	28.19	--	7.69	17.81
VA Non-MSA	75	10,656	34.40	4,276	16.42	1.33	4.14	18.51	14.67	13.10	19.71	21.33	18.64	45.36	58.67	43.17	--	4.00	20.95
<b>Total</b>	<b>218</b>	<b>37,599</b>	<b>100.00</b>	<b>11,347</b>	<b>18.43</b>	<b>6.42</b>	<b>6.51</b>	<b>18.42</b>	<b>15.60</b>	<b>18.45</b>	<b>21.54</b>	<b>25.69</b>	<b>22.21</b>	<b>41.62</b>	<b>45.87</b>	<b>33.83</b>	<b>--</b>	<b>6.42</b>	<b>18.99</b>

*Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

**Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2022-2023**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Staunton MSA	316	49,186	69.91	7,818	19.64	9.18	9.84	17.90	26.90	25.71	23.53	28.16	24.11	38.92	29.43	25.04	--	6.33	15.30
VA Non-MSA	136	14,928	30.09	4,523	17.17	6.62	4.02	18.75	16.91	16.36	20.02	25.00	21.22	44.06	47.06	40.24	--	4.41	18.15
<b>Total</b>	<b>452</b>	<b>64,114</b>	<b>100.00</b>	<b>12,341</b>	<b>18.68</b>	<b>8.41</b>	<b>7.71</b>	<b>18.23</b>	<b>23.89</b>	<b>22.28</b>	<b>22.16</b>	<b>27.21</b>	<b>23.05</b>	<b>40.93</b>	<b>34.73</b>	<b>30.61</b>	<b>--</b>	<b>5.75</b>	<b>16.34</b>

*Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

**Table 9: 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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Staunton MSA	116	11,445	78.91	2,221	3.89	5.17	3.65	5.59	6.90	6.48	82.82	82.76	83.25	7.69	5.17	6.62	--	--	--
VA Non-MSA	31	1,169	21.09	1,230	--	--	--	6.05	3.23	4.47	58.88	67.74	56.83	35.08	29.03	38.70	--	--	--
<b>Total</b>	<b>147</b>	<b>12,614</b>	<b>100.00</b>	<b>3,451</b>	<b>2.32</b>	<b>4.08</b>	<b>2.35</b>	<b>5.78</b>	<b>6.12</b>	<b>5.77</b>	<b>73.17</b>	<b>79.59</b>	<b>73.83</b>	<b>18.73</b>	<b>10.20</b>	<b>18.05</b>	<b>--</b>	<b>--</b>	<b>--</b>

*Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 Dunn & Bradstreet SBSF Demographics, 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Staunton MSA	183	21,367	88.83	4,042	--	--	--	12.44	11.48	11.68	69.91	72.13	71.40	17.65	16.39	16.92	--	--	--
VA Non-MSA	23	5,002	11.17	2,654	--	--	--	2.38	8.70	2.49	67.24	60.87	66.88	28.55	30.43	29.80	1.82	--	0.83
<b>Total</b>	<b>206</b>	<b>26,369</b>	<b>100.00</b>	<b>6,696</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>8.35</b>	<b>11.17</b>	<b>8.03</b>	<b>68.83</b>	<b>70.87</b>	<b>69.61</b>	<b>22.08</b>	<b>17.96</b>	<b>22.03</b>	<b>0.74</b>	<b>--</b>	<b>0.33</b>

*Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.*  
*Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Staunton MSA	116	11,445	78.91	2,221	82.79	62.07	54.03	8.38	37.93	8.84	--
VA Non-MSA	31	1,169	21.09	1,230	84.79	80.65	60.57	6.95	19.35	8.25	--
<b>Total</b>	<b>147</b>	<b>12,614</b>	<b>100.00</b>	<b>3,451</b>	<b>83.60</b>	<b>65.99</b>	<b>56.36</b>	<b>7.80</b>	<b>34.01</b>	<b>8.60</b>	<b>--</b>

*Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 Dunn & Bradstreet SBSF Demographics, 2021 CRA Aggregate Data, "--" data not available.*  
*Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Staunton MSA	183	21,367	88.83	4,042	80.00	59.02	61.36	9.76	40.98	10.24	--
VA Non-MSA	23	5,002	11.17	2,654	82.23	86.96	59.04	8.31	13.04	9.46	--
<b>Total</b>	<b>206</b>	<b>26,369</b>	<b>100.00</b>	<b>6,696</b>	<b>80.91</b>	<b>62.14</b>	<b>60.44</b>	<b>9.17</b>	<b>37.86</b>	<b>9.92</b>	<b>--</b>

*Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.*  
*Due to rounding, totals may not equal 100.0%*

State of West Virginia

Table 7: 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 Number	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	
Beckley MSA	297	28,102	39.03	2,595	--	--	--	7.95	3.03	4.51	81.32	81.48	77.73	10.73	15.49	17.76	--	--	--	
Morgantown MSA	49	10,516	6.44	4,267	0.05	--	0.21	15.29	20.41	12.47	43.23	30.61	35.62	41.43	48.98	51.70	--	--	--	
WV Non-MSA	415	49,709	54.53	5,998	--	--	--	8.78	4.10	5.29	68.38	70.84	61.77	22.84	25.06	32.94	--	--	--	
<b>Total</b>	<b>761</b>	<b>88,327</b>	<b>100.00</b>	<b>12,860</b>	<b>0.01</b>	<b>--</b>	<b>0.07</b>	<b>9.57</b>	<b>4.73</b>	<b>7.51</b>	<b>67.93</b>	<b>72.40</b>	<b>56.31</b>	<b>22.50</b>	<b>22.86</b>	<b>36.10</b>	<b>--</b>	<b>--</b>	<b>--</b>	

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2022-2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total Number	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	
Beckley MSA	551	49,847	39.27	3,477	--	--	--	12.69	10.16	12.74	67.92	60.07	62.41	19.39	29.76	24.85	--	--	--	
Morgantown MSA	91	24,073	6.49	4,249	0.19	--	0.42	9.49	8.79	6.64	52.40	58.24	49.73	37.39	32.97	42.36	0.54	--	0.85	
WV Non-MSA	761	85,623	54.24	7,608	0.68	0.13	0.51	17.25	14.59	16.09	56.19	52.96	53.15	25.88	32.33	30.24	--	--	--	
<b>Total</b>	<b>1,403</b>	<b>159,543</b>	<b>100.00</b>	<b>15,334</b>	<b>0.42</b>	<b>0.07</b>	<b>0.37</b>	<b>14.70</b>	<b>12.47</b>	<b>12.71</b>	<b>58.69</b>	<b>56.09</b>	<b>54.30</b>	<b>26.11</b>	<b>31.36</b>	<b>32.38</b>	<b>0.09</b>	<b>--</b>	<b>0.23</b>	

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table 8: 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 Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Beckley MSA	297	28,102	39.03	2,595	20.65	4.71	5.70	18.15	13.80	15.26	20.72	26.60	21.00	40.48	50.84	44.86	--	4.04	13.18
Morgantown MSA	49	10,516	6.44	4,267	20.91	--	5.27	14.43	26.53	14.44	20.43	18.37	18.47	44.23	51.02	47.90	--	4.08	13.92
WV Non-MSA	415	49,709	54.53	5,998	20.57	5.06	4.58	16.85	13.98	13.69	20.67	23.37	20.17	41.91	52.53	44.45	--	5.06	17.11
<b>Total</b>	<b>761</b>	<b>88,327</b>	<b>100.00</b>	<b>12,860</b>	<b>20.65</b>	<b>4.60</b>	<b>5.04</b>	<b>16.81</b>	<b>14.72</b>	<b>14.25</b>	<b>20.64</b>	<b>24.31</b>	<b>19.77</b>	<b>41.89</b>	<b>51.77</b>	<b>45.68</b>	<b>--</b>	<b>4.60</b>	<b>15.26</b>

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022-2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Beckley MSA	551	49,847	39.27	3,477	25.08	8.17	7.56	15.31	20.33	18.58	18.61	22.32	22.92	41.00	43.92	39.11	--	5.26	11.82
Morgantown MSA	91	24,073	6.49	4,249	20.70	2.20	8.07	16.77	15.38	18.00	16.33	27.47	19.98	46.19	49.45	41.14	--	5.49	12.80
WV Non-MSA	761	85,623	54.24	7,608	20.34	5.65	5.89	17.06	15.51	15.81	20.22	22.60	21.95	42.39	52.17	41.54	--	4.07	14.81
<b>Total</b>	<b>1,403</b>	<b>159,543</b>	<b>100.00</b>	<b>15,334</b>	<b>21.67</b>	<b>6.41</b>	<b>6.87</b>	<b>16.54</b>	<b>17.39</b>	<b>17.05</b>	<b>19.09</b>	<b>22.81</b>	<b>21.63</b>	<b>42.70</b>	<b>48.75</b>	<b>40.88</b>	<b>--</b>	<b>4.63</b>	<b>13.58</b>

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table 9: 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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	
Beckley MSA	178	19,119	49.58	1,785	--	--	--	4.66	2.25	3.70	84.27	83.71	82.02	11.07	14.04	14.29	--	--	--	
Morgantown MSA	4	1,556	1.11	2,104	0.28	--	0.24	20.13	--	19.11	36.56	100.00	37.50	43.03	--	43.16	--	--	--	
WV Non-MSA	177	10,636	49.30	4,118	--	--	--	10.64	2.82	11.41	57.72	73.45	59.52	31.64	23.73	29.07	--	--	--	
<b>Total</b>	<b>359</b>	<b>31,311</b>	<b>100.00</b>	<b>8,007</b>	<b>0.08</b>	<b>--</b>	<b>0.06</b>	<b>12.06</b>	<b>2.51</b>	<b>11.71</b>	<b>57.47</b>	<b>78.83</b>	<b>58.75</b>	<b>30.39</b>	<b>18.66</b>	<b>29.47</b>	<b>--</b>	<b>--</b>	<b>--</b>	

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 Dunn & Bradstreet SBSF Demographics, 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2022-2023
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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	
Beckley MSA	106	13,272	60.92	3,678	--	--	--	14.86	20.75	13.16	65.19	43.40	66.59	19.95	35.85	20.26	--	--	--	
Morgantown MSA	4	767	2.30	3,499	0.57	--	0.69	13.46	--	10.55	47.90	--	47.76	33.09	100.00	36.61	4.97	--	4.40	
WV Non-MSA	64	7,960	36.78	7,017	1.11	--	0.77	15.80	6.25	15.76	53.57	46.88	54.52	29.53	46.88	28.94	--	--	--	
<b>Total</b>	<b>174</b>	<b>21,999</b>	<b>100.00</b>	<b>14,194</b>	<b>0.71</b>	<b>--</b>	<b>0.55</b>	<b>14.94</b>	<b>14.94</b>	<b>13.80</b>	<b>54.56</b>	<b>43.68</b>	<b>55.98</b>	<b>28.40</b>	<b>41.38</b>	<b>28.58</b>	<b>1.38</b>	<b>--</b>	<b>1.08</b>	

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table 10: 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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Beckley MSA	178	19,119	49.58	1,785	77.43	78.65	47.73	10.24	21.35	12.33	--	
Morgantown MSA	4	1,556	1.11	2,104	82.70	75.00	44.82	7.86	25.00	9.44	--	
WV Non-MSA	177	10,636	49.30	4,118	78.95	89.27	48.74	9.69	10.73	11.36	--	
<b>Total</b>	<b>359</b>	<b>31,311</b>	<b>100.00</b>	<b>8,007</b>	<b>79.70</b>	<b>83.84</b>	<b>47.48</b>	<b>9.29</b>	<b>16.16</b>	<b>11.02</b>	<b>--</b>	

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 Dunn & Bradstreet SBSF Demographics, 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Beckley MSA	106	13,272	60.92	3,678	73.34	64.15	49.78	11.52	35.85	15.15	--	
Morgantown MSA	4	767	2.30	3,499	79.25	75.00	56.27	9.02	25.00	11.72	--	
WV Non-MSA	64	7,960	36.78	7,017	74.29	78.13	55.25	11.01	21.88	14.70	--	
<b>Total</b>	<b>174</b>	<b>21,999</b>	<b>100.00</b>	<b>14,194</b>	<b>75.46</b>	<b>69.54</b>	<b>54.09</b>	<b>10.57</b>	<b>30.46</b>	<b>13.97</b>	<b>--</b>	

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%