



PUBLIC DISCLOSURE

October 3, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Kingston National Bank
Charter Number 9536

2 North Main Street
Kingston, OH 45644

Office of the Comptroller of the Currency

Central Ohio – Indiana Office
Westlake Center
4555 Lake Forest Drive, Suite 520
Blue Ash, OH 45242-3760

Note: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

Table of Contents

Overall CRA Rating	1
Description of Institution.....	2
Scope of the Evaluation.....	3
Discriminatory or Other Illegal Credit Practices Review	5
State Rating	6
State of Ohio.....	6
Community Development Test.....	17
Appendix A: Scope of Examination.....	1
Appendix B: Summary of State Ratings.....	1
Appendix C: Definitions and Common Abbreviations.....	1
Appendix D: Tables of Performance Data.....	1

Overall CRA Rating

Institution's CRA Rating: This institution is rated Satisfactory.

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Outstanding.

The major factors that support this rating include:

- The Lending Test rating is based on the state rating and the following overall conclusions:
 - The loan-to-deposit (LTD) ratio is reasonable.
 - A majority of the bank's loans are inside the assessment areas (AAs).
 - The bank exhibits a reasonable distribution of loans to individuals of different incomes and businesses and farms of different sizes given the product lines offered by the bank.
- The Community Development (CD) Test rating is based on the state rating, which is overall outstanding. The bank's level of CD lending represents excellent responsiveness to CD needs, considering the bank's capacity and the need and availability of such opportunities for CD in the AAs. The Office of the Comptroller of the Currency (OCC) placed more weight on CD lending over CD investments and services given the opportunities for CD during the recent pandemic.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio is reasonable.

Kingston National Bank's (KNB or bank) quarterly average LTD ratio over the 10 quarters since the previous Community Reinvestment Act (CRA) evaluation (September 30, 2019, to December 31, 2021) is 78.5 percent. The ratio ranged from a high of 81.2 percent as of December 31, 2020, to a low of 74.6 percent as of September 30, 2021. The bank's quarterly average LTD ratio is reasonable when compared to financial institutions of similar size headquartered in the bank's AAs, which includes financial institutions with total assets less than \$600 million. KNB's average LTD ratio is ranked third highest out of these similarly situated financial institutions. The other financial institutions have an average LTD ratio of 84.7 percent, ranging from 69.3 percent to 96.2 percent.

The bank does not sell bank-originated home mortgage loans on the secondary market. However, KNB is a broker for Rocket Mortgage and Franklin American Mortgage Company. During the evaluation period, KNB brokered 54 home mortgage loans totaling \$10 million. These loans did not close in the bank's name.

Lending in Assessment Area

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

The bank originated and purchased 74.9 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	457	77.3	134	22.7	591	70,639	72.7	26,542	27.3	97,181
Small Business	45	75.0	15	25.0	60	8,890	72.6	3,348	27.4	12,238
Small Farm	33	52.4	30	47.6	63	7,060	48.9	7,384	51.1	14,444
Total	535	74.9	179	25.1	714	86,589	69.9	37,274	30.1	123,863

*Source: Home Mortgage Disclosure Act (HMDA) Data; small business and small farm loan samples (bank data).
Evaluation Period: 1/1/19 – 12/31/21.
Due to rounding, totals may not equal 100.0 percent.*

Description of Institution

KNB is a wholly owned subsidiary of Kingston Bancshares, Inc., a one-bank holding company. Both the bank and holding company are headquartered in Kingston, Ohio. As of December 31, 2021, total assets were \$477.1 million, with \$330.2 million in net loans and leases, \$419.3 million in total deposits, and \$44.8 million in tier 1 capital. There was no merger or acquisition activity that affected the scope of the bank's operations during the evaluation period.

The bank's main office in Kingston, Ohio is located approximately 50 miles southeast of Columbus, Ohio in Ross County, in an upper-income census tract (CT). The bank has five other branch locations in Ohio, and all have drive-up facilities and automated teller machines (ATMs). The Chillicothe and Adelphi branches are in Ross County in middle-and upper-income CTs, as of the 2015 American Community Survey (ACS) U.S. Census data. KNB's Amanda branch in Fairfield County is in a moderate-income CT. The bank has two branches in Pickaway County, the South Bloomfield and Circleville branches. The South Bloomfield branch is in a middle-income CT and the Circleville branch is in a moderate-income CT. No offices have been opened or closed since the prior CRA evaluation in 2019.

KNB is a single-state financial institution with one rating area (Ohio) and two AAs in Ohio. The first AA includes all of Ross County, Ohio, which is in a non-metropolitan statistical area (Non-MSA AA). The bank's second AA is in the Columbus, Ohio MSA 18140 and includes Pickaway County, in its entirety, CTs 325 and 326 in Fairfield County, and CT 9650 in Hocking County (MSA AA). The AAs are contiguous, meet the requirements of the regulation, and do not reflect illegal discrimination, nor do they arbitrarily exclude any low- and moderate-income (LMI) areas. The AAs are described in the "Scope of the Evaluation" and "Description of Institution's Operations in Ohio" sections in this performance evaluation (PE).

As of the December 31, 2021, Consolidated Reports of Condition and Income (Call Report) and Uniform Bank Performance Report, KNB's total loans were \$333.5 million representing 69.9 percent of total assets. The bank offers a variety of traditional lending and deposit products to accommodate its customers, including business, farm, home mortgage, and consumer loans. Deposit products include standard checking, savings, and certificates of deposit. The bank also offers online and mobile banking.

The COVID-19 pandemic in 2020 impacted the local economy, including unemployment data. The Small Business Administration's (SBA) Paycheck Protection Program (PPP) provided loans to help businesses keep their workforces employed during the pandemic. The bank was particularly responsive to the SBA's PPP and originated a significant volume of PPP loans in 2020 and 2021. In 2020, the bank originated 171 PPP loans totaling \$13.7 million. In 2021, the bank originated 930 PPP loans totaling \$24.2 million (11 were originated in states other than Ohio totaling \$151,107). The 2021 SBA PPP loans met the definition of CD at loan origination and are included as CD loans. Refer to the "CD Test" section of this PE for more details on the 2021 PPP loans.

The bank's primary lending focus is residential real estate (home mortgage), agriculture (farm), and commercial and industrial and commercial real estate (business) lending. The bank's loan portfolio, as of the December 31, 2021, Call Report, is comprised of 32.8 percent home mortgage loans, 39.4 percent farm loans, 24.3 percent business loans, and 3.5 percent consumer loans. The bank's loan originations and purchases, based on the number of loans during the evaluation period, are 20.6 percent home mortgages, 45.2 percent business loans (including SBA PPP loans), 4 percent farm loans, and 30.2 percent consumer loans. The bank's loan originations and purchases, based on the dollar amount of loans during the evaluation period, are 35.8 percent home mortgages, 30.1 percent business loans (including SBA PPP loans), 26.4 percent farm loans, and 7.7 percent consumer loans.

There are no financial, legal, or other factors that impede the bank's ability to help meet the credit needs of its AAs. KNB's previous CRA rating was Satisfactory as of the September 30, 2019, PE.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The OCC conducted a CRA performance evaluation to assess the bank's record of meeting the credit and CD needs of its entire community, including LMI areas. As of 2019, the bank was a small bank for CRA purposes. In 2020, the bank's total assets exceeded the small bank CRA total assets threshold, and the bank became an intermediate small bank for CRA purposes. In 2021, the bank reverted to a small bank under the OCC's CRA regulation in effect for that year. The bank is an intermediate small bank beginning in 2022. During this CRA evaluation, the OCC used intermediate small bank CRA evaluation procedures to assess the bank's CRA performance, including only 2020 and 2021 CD information for the CD Test. The evaluation period was January 1, 2019, to December 31, 2021.

Based on discussions with management and the number and dollar volume of loan originations and purchases supplied by the bank during the evaluation period, home mortgage, business, and

farm lending are the bank’s primary lending products and were evaluated under the Lending Test. While the bank offers other lending products, these products were not a primary product during the evaluation period and were not considered in this PE, as an analysis of this data would not be meaningful. KNB’s primary lending products are discussed under the “Description of Institution” section in this PE.

For the Lending Test, the OCC evaluated home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA) for 2019, 2020, and 2021. For the farm loans, the OCC transaction tested 63 loans during the evaluation period for the Lending in AA Test. This included all originated small farm loans (with original loan amounts of \$500,000 or less) during the evaluation period. Of the 63 loans, only 33 small farm loans were originated inside the AA. Therefore, the geographic distribution and borrower income/gross annual revenue analyses included only the 33 loans inside the AAs. For the business loans, the OCC transaction tested 60 loans during the evaluation period for the Lending in AA Test, excluding the SBA PPP loans. For the geographic distribution and borrower income/gross annual revenue analyses, the OCC included all originated small business loans (with original loan amounts of \$1 million or less and inside the AA) during the evaluation period, excluding SBA PPP loans. The OCC relied on internal bank reports for the transaction testing of small farm and small business loans originated or purchased during the evaluation period. No affiliate activity was included in this analysis.

For analysis purposes, the OCC compared the bank’s lending performance with demographic data from the 2015 ACS U.S. Census data and 2021 Dun and Bradstreet (D&B) data. Refer to the table in appendix A, Scope of the Examination, for more information on the scope of the review.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of the AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same MSA were combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state were combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the “Scope” section under the state of Ohio 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.

KNB has two AAs, the MSA AA and Non-MSA AA, as described above under the “Description of Institution” section. The OCC completed a full-scope review for each AA. A description of the AAs is provided in the “Description of Institution’s Operations in Ohio” section of this PE.

Ratings

The bank’s overall rating is a blend of the state ratings. Since all KNB’s offices are in Ohio, the bank’s rating is based on the performance solely in Ohio.

The rating is based on performance in all the bank’s AAs. Each AA was weighted equally. The OCC placed the most weight on the home mortgage loans, as 83.7 percent of the total loans in the loan samples were home mortgage loans (457 home mortgage loans as reported in the 2019,

2020, and 2021 HMDA data). The small business loan sample included 52 loans (10 percent) inside the AA and the small farm loan sample included 33 loans (6.3 percent), as evidenced in Tables Q, R, S, and T in Appendix D. The OCC placed the least weight on the small farm loans due to home mortgage and small business loans samples by number and dollar volume of originated and purchased loans during the evaluation period exceeding that of farm loans. Refer to the “Description of Institution” section for details on the loan origination and purchase volume during the evaluation period and the “Scope” section under the state rating for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

State Rating

State of Ohio

CRA rating for the State of Ohio: Satisfactory.

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Outstanding.

The major factors that support this rating include:

- The bank exhibits a reasonable distribution of loans to individuals of different incomes and businesses and farms of different sizes.
- KNB exhibits an excellent geographic distribution of loans in the AAs.
- The bank has not received any complaints about its performance in helping to meet the AAs' credit needs during the evaluation period.
- The bank's responsiveness to CD needs of the AAs through CD lending is overall excellent.

Description of Institution's Operations in Ohio

KNB designated two AAs in Ohio, the MSA AA and Non-MSA AA. The bank selected the AAs based on their targeted lending area and office locations. The AAs are contiguous, meet the requirements of the regulation, and do not reflect illegal discrimination, nor do they arbitrarily exclude any LMI areas.

MSA AA

Demographic Information of the Assessment Area						
Assessment Area: MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	16	0.0	43.8	43.8	6.3	6.3
Population by Geography	72,642	0.0	35.0	55.4	4.7	4.8
Housing Units by Geography	27,274	0.0	40.5	54.9	4.6	0.0
Owner-Occupied Units by Geography	18,494	0.0	32.0	62.1	5.9	0.0
Occupied Rental Units by Geography	6,351	0.0	62.4	35.3	2.3	0.0
Vacant Units by Geography	2,429	0.0	48.0	51.0	0.9	0.0
Businesses by Geography	3,371	0.0	40.0	54.3	5.5	0.2
Farms by Geography	369	0.0	35.5	51.8	12.7	0.0
Family Distribution by Income Level	18,204	21.4	20.0	23.5	35.1	0.0

Household Distribution by Income Level	24,845	22.2	17.2	19.5	41.1	0.0
Median Family Income MSA - 18140 Columbus, OH MSA	\$70,454		Median Housing Value			\$144,306
			Median Gross Rent			\$756
			Families Below Poverty Level			8.6%
<i>Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The MSA AA includes Pickaway County, in its entirety, CTs 325 and 326 in Fairfield County, and CT 9650 in Hocking County in the Columbus, Ohio MSA 18140. The bank has three branches in the MSA AA: the Amanda Branch in Fairfield County in a moderate-income CT, the South Bloomfield Branch in Pickaway County in a middle-income CT, and the Circleville Branch in Pickaway County in a moderate-income CT. Each branch has a drive-up and ATM. Circleville is the largest city and county seat of Pickaway County.

According to the 2015 ACS U.S. Census data, the population of the AA is 72,642, with 35 percent living in moderate-income CTs, 55.4 percent in middle-income CTs, 4.7 percent living in upper-income CTs, and 4.8 percent in CTs that have not been assigned an income classification. There are no low-income CTs in the AA. The AA comprises 16 CTs, of which 43.8 are moderate-income, 43.8 percent are middle-income, 6.3 percent are upper-income CTs, and 6.3 percent of the CTs that have not been assigned an income classification. The AA includes 18,204 families and 24,845 households. There were no CT classification changes and no designated distressed or underserved CTs in the AA during the evaluation period (2019 – 2021).

According to the 2015 ACS U.S. Census data, the median housing value in the AA was \$144,306. Based on the weighted average of Census MSA Median Family Income of \$70,454 in the table above, low-income families make less than \$35,227 and moderate-income families make at least \$35,227 but less than \$56,363 annually. Median housing values are at least 4.1 times the annual income of low-income families and 2.6 times the annual income of moderate-income families. The housing costs relative to income may have a limiting effect on mortgage demand among some LMI families. As of the 2015 ACS U.S. Census, there are 27,274 total housing units in the AA, of which 67.8 percent are owner-occupied, 23.3 percent are rental occupied units, and 8.9 are vacant units. The median age of housing stock is approximately 44 years overall and 56 years in moderate-income CTs. The cost of homeownership in older housing stock is typically higher than in newer housing; thus, the median age of housing in moderate-income geographies is also a significant barrier to mortgage lending in those CTs. Additionally, 8.6 percent of the families live below the poverty level, making it especially difficult for this segment of the population to afford and maintain a home or qualify for a loan.

As stated above, KNB’s primary business focus includes home mortgage lending. KNB ranks 14th out of 231 lenders in the MSA AA in residential home mortgage volume based on 2021 Peer Mortgage Data and 2015 ACS U.S. Census data. KNB had 1.8 percent of the lending market share, based on the number of loans, as of the 2021 Peer Mortgage Data Report, lending \$14.4 million (78 loans). Top mortgage lenders in the AA include Huntington National Bank, Rocket

Mortgage, Union Savings Bank, Fifth Third Bank, National Association (N.A.), and U.S. Bank, N.A., with a combined market share of 22.9 percent.

Small business lending is a primary product in the MSA AA. According to the D&B data as of June 2021, 83 percent of the businesses located in the AA have gross annual revenues of \$1 million or less and 71.6 percent of the businesses have fewer than five employees. According to the 2020 Peer Small Business Data, 87 lenders originated or purchased a total of 3,300 small business loans in the MSA AA. The top five lenders included JPMorgan Chase Bank, N.A., American Express National Bank, Park National Bank, Huntington National Bank, and PNC Bank, N.A., with a combined market share of 52.5 percent based on the number of loans. KNB is not included in the peer small business data report as the bank is not required to report CRA small business loan data.

Small farm lending is a primary product for the bank. According to the D&B data as of June 2021, 97.8 percent of the farms located in the AA have gross annual revenues of \$1 million or less. According to the 2020 Peer Small Farm Data, 14 lenders originated or purchased a total of 131 small farm loans in the MSA AA. The top five lenders included John Deere Financial, Federal Savings Bank (F.S.B.), Wells Fargo Bank, N.A., JPMorgan Chase Bank, N.A., Huntington National Bank, and Park National Bank, with a combined market share of 80.9 percent based on the number of loans. KNB is not included in the peer small farm data report as the bank is not required to report CRA small farm loan data.

Competition in the AA is strong. As of the June 30, 2021, Federal Deposit Insurance Corporation's (FDIC) Deposit Market Share Report, KNB held \$125.2 million in deposits, which is 2.9 percent of the total deposits in this market area. This represents 30.9 percent of KNB's total deposits. As of the June 30, 2021, FDIC Deposit Market Share Report, KNB ranked 12th out of 21 deposit market competitors. The top five financial institutions with significant deposit activity in the area include Park National Bank, Vinton County National Bank, JPMorgan Chase Bank, N.A., Huntington National Bank, and PNC Bank, N.A., with a combined deposit market share of 56.3 percent.

The economic conditions in the MSA AA have improved since the start of the COVID-19 pandemic and are overall stable. The "not seasonally adjusted" unemployment rates as of December 2021 were 2.9 percent in Fairfield County, 3.6 percent in Hocking County, and 3.1 percent in Pickaway County which is overall reasonable when compared with the Ohio unemployment rate of 3.4 percent and national rate of 3.7 percent (Ohio Department of Job and Family Services/Office of Workforce Development – Bureau of Labor Market Statistics, December 2021). Primary industries include manufacturing and agriculture. Large employers in the MSA AA include DuPont, TriMold LLC, and Sofidel.

As part of the CRA performance evaluation, the OCC reviewed information provided from three interviews with representatives from affordable housing and other community organizations. The contacts identified affordable housing and financial literacy as needs in the area. In general, local financial institutions are adequately meeting the credit and CD needs of the community.

Non-MSA AA

Demographic Information of the Assessment Area						
Assessment Area: Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	17	0.0	23.5	58.8	17.6	0.0
Population by Geography	77,334	0.0	21.0	62.6	16.5	0.0
Housing Units by Geography	31,917	0.0	22.5	60.9	16.5	0.0
Owner-Occupied Units by Geography	20,275	0.0	19.0	62.4	18.6	0.0
Occupied Rental Units by Geography	7,994	0.0	28.9	57.4	13.7	0.0
Vacant Units by Geography	3,648	0.0	28.3	60.6	11.2	0.0
Businesses by Geography	3,592	0.0	39.4	46.9	13.7	0.0
Farms by Geography	229	0.0	24.9	56.8	18.3	0.0
Family Distribution by Income Level	19,608	22.9	18.7	20.1	38.2	0.0
Household Distribution by Income Level	28,269	24.4	17.1	18.1	40.4	0.0
Median Family Income Non-MSAs - OH		\$55,785	Median Housing Value			\$108,527
			Median Gross Rent			\$670
			Families Below Poverty Level			14.0%
<i>Source: 2015 ACS and 2021 D&B Data.</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The Non-MSA AA includes Ross County, in its entirety. The bank has three branches in the Non-MSA AA: the main office in Kingston and Adelphi Branch in upper-income CTs, and the Chillicothe Branch in a middle-income CT. Each branch has a drive-up and ATM. Chillicothe is the largest city and county seat of Ross County.

According to the 2015 ACS U.S. Census data, the population of the AA is 77,334, with 21 percent living in moderate-income CTs, 62.6 percent in middle-income CTs, and 16.5 percent living in upper-income CTs. There are no low-income CTs in the AA. The AA comprises 17 CTs, of which 23.5 are moderate-income, 58.8 percent are middle-income, and 17.6 percent are upper-income CTs. The AA includes 19,608 families and 28,269 households. There were no CT classification changes and no designated distressed or underserved CTs in the AA during the evaluation period (2019 – 2021).

According to the 2015 ACS U.S. Census data, the median housing value in the AA was \$108,527. Based on the weighted average of Census MSA Median Family Income of \$55,785 in the table above, low-income families make less than \$27,893 and moderate-income families make at least \$27,893 but less than \$44,628 annually. Median housing values are at least 3.9

times the annual income of low-income families and 2.4 times the annual income of moderate-income families. The housing costs relative to income may have a limiting effect on mortgage demand among some LMI families. As of the 2015 ACS U.S. Census, there are 31,917 total housing units in the AA, of which 63.5 percent are owner-occupied, 25.1 percent are rental occupied units, and 11.4 are vacant units. The median age of housing stock is approximately 49 years overall and 61 years in moderate-income CTs. The cost of homeownership in older housing stock is typically higher than in newer housing; thus, the median age of housing in moderate-income geographies is also a significant barrier to mortgage lending in those CTs. Additionally, 14 percent of the families live below the poverty level, making it especially difficult for this segment of the population to afford and maintain a home or qualify for a loan.

As stated above, KNB's primary business focus includes home mortgage lending. KNB ranks 9th out of 174 lenders in the Non-MSA AA in residential home mortgage volume based on 2021 Peer Mortgage Data and 2015 ACS U.S. Census data. KNB had 3.2 percent of the lending market share, based on the number of loans, as of the 2021 Peer Mortgage Data Report, lending \$14.2 million (88 loans). Top mortgage lenders in the AA include Huntington National Bank, Vinton County National Bank, Fifth Third Bank, N.A., Rocket Mortgage, and Homeland Credit Union, with a combined market share of 31.8 percent.

Small business lending is a primary product in the Non-MSA AA. According to the D&B data as of June 2021, 79 percent of the businesses located in the AA have gross annual revenues of \$1 million or less and 67.5 percent of the businesses have fewer than five employees. According to the 2020 Peer Small Business Data, 54 lenders originated or purchased a total of 734 small business loans in the Non-MSA AA. The top five lenders included Synchrony Bank, American Express National Bank, Huntington National Bank, Wesbanco Bank Inc., and PNC Bank, N.A., with a combined market share of almost 54 percent based on the number of loans. KNB is not included in the peer small business data report as the bank is not required to report CRA small business loan data.

Small farm lending is a primary product for the bank. According to the D&B data as of June 2021, 99.1 percent of the farms located in the AA have gross annual revenues of \$1 million or less. According to the 2020 Peer Small Farm Data, nine lenders originated or purchased a total of 40 small farm loans in the Non-MSA AA. The top five lenders included John Deere Financial, F.S.B., LCNB National Bank, Huntington National Bank, Wells Fargo Bank, N.A. and Cit Bank, N.A, with a combined market share of 90 percent based on the number of loans. KNB is not included in the peer small farm data report as the bank is not required to report CRA small farm loan data.

Competition in the AA is strong. As of the June 30, 2021, FDIC's Deposit Market Share Report, KNB held \$280.4 million in deposits, which is 25.2 percent of the total deposits in this market area. This represents 69.1 percent of KNB's total deposits. As of the June 30, 2021, FDIC Deposit Market Share Report, KNB ranked 1st out of nine deposit market competitors. The top five financial institutions with significant deposit activity in the area, behind KNB, include Vinton County National Bank, Huntington National Bank, LCNB National Bank, PNC Bank, N.A., and Fifth Third Bank, N.A., with a combined deposit market share of 63.6 percent.

The economic conditions in the Non-MSA AA have improved since the start of the COVID-19 pandemic and are overall stable. The “not seasonally adjusted” unemployment rate as of December 2021 was 3.5 percent in Ross County, which is overall reasonable when compared with the Ohio unemployment rate of 3.4 percent and national rate of 3.7 percent (Ohio Department of Job and Family Services/Office of Workforce Development – Bureau of Labor Market Statistics, December 2021). Primary industries include manufacturing and agriculture. Large employers in the Ross County include Kenworth Truck Company, Pixelle Specialty Products, and YSK Corporation.

As part of this CRA evaluation, the OCC reviewed information provided from interviews with representatives from affordable housing or other non-profit organizations. The contacts identified affordable housing and financial literacy as needs in the community. In general, local financial institutions are adequately meeting the credit and CD needs of the community.

Scope of Evaluation in Ohio

The OCC performed a full-scope review for each AA. The data in the AAs was analyzed and presented as two AAs for the purposes of this evaluation. Home mortgage loans, small loans to businesses, and small loans to farms are the bank’s primary lending products and were evaluated under the Lending Test. As discussed above, the OCC evaluated home mortgage lending using all HMDA data for 2019, 2020, and 2021. The OCC transaction tested small loans to farms and businesses as discussed above under the Scope of the Evaluation - Ratings section.

The rating is based on performance in all the bank’s AAs. Each AA was weighted equally. The OCC placed the most weight on the home mortgage loans and the least weight on small farm loans, as discussed above. Refer to the “Scope of the Evaluation” section for details regarding how the areas were weighted in arriving at the respective ratings.

Conclusions in Respect to Performance Tests in Ohio

Lending Test

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s lending performance in the state of Ohio is reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in the AAs.

According to the 2015 ACS U.S. Census data, the bank had no low-income CTs in the AAs. In the MSA AA, there were seven moderate-income CTs, with four located near the Circleville, Ohio area. In the Non-MSA AA, there were four moderate-income CTs, with three located near

Chillicothe, Ohio. Also, CT 213 in Pickaway County in the MSA AA includes the Pickaway Correctional Facility and the CT does not have an income classification.

Home Mortgage Loans

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

The OCC compared the percentage of home mortgage loans originated or purchased by the bank to the percentage of owner-occupied housing units (demographic data) in the four geographic income categories, placing emphasis on the LMI geographies. The OCC also compared the bank's performance against the percentage of home mortgage loans of other mortgage lenders (aggregate data) in the AA, as demonstrated by HMDA aggregate data.

In determining the ratings, the OCC weighed demographic factors of the AA that could affect the bank's ability to lend. These factors include competition from larger financial institutions, the number of moderate-income geographies, branch presence, area demographics, and the location of most owner-occupied housing.

The bank exhibits an excellent geographic distribution of home mortgage loans in the AAs.

MSA AA

The bank exhibits an excellent geographic distribution of home mortgage loans in the MSA AA. During the evaluation period, the percentage of home mortgage loans originated or purchased by the bank in moderate-income CTs is excellent. The bank's percentage of home mortgage loans in the moderate-income CTs significantly exceeded aggregate data of other HMDA reporters and demographic data (percentage of owner-occupied housing units).

Non-MSA AA

The bank exhibits an excellent geographic distribution of home mortgage loans in the Non-MSA AA. During the evaluation period, the percentage of home mortgage loans originated or purchased by the bank in moderate-income CTs is excellent. The bank's percentage of home mortgage loans in the moderate-income CTs exceeded aggregate data and was commensurate with demographic data.

The OCC considered other factors including the age of housing stock in the AA. The median age of housing stock is approximately 49 years. The cost of homeownership in older housing is typically higher than newer housing; thus, the median age of housing of 61 years in moderate-income geographies is also a barrier to mortgage lending in those CTs.

Small Loans to Businesses

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

The OCC compared the percentage of the number of small loans to businesses originated or purchased by the bank in the four geographic income categories (low-, moderate-, middle-, and upper-income) to the distribution of businesses throughout those geographies (demographic data), placing emphasis on the LMI geographies. The OCC also compared the bank's performance against the percentage of small loans to businesses of other lenders (aggregate data), as demonstrated by CRA aggregate data.

In determining the conclusions, the OCC gave consideration for opportunities to lend based on the number of CTs in each income level, the level of competition, and the number businesses located in the moderate-income CTs within the AA.

The bank's geographic distribution of small loans to businesses is excellent.

MSA AA

The bank's geographic distribution of small loans to businesses is excellent in the MSA AA. The percentage of small loans to businesses originated or purchased by the bank in moderate-income CTs significantly exceeded aggregate and demographic data. Competition for business loans remains strong in the AA.

Non-MSA AA

The bank's geographic distribution of small loans to businesses is excellent in the Non-MSA AA. The percentage of small loans to businesses originated or purchased by the bank in moderate-income CTs exceeded aggregate data and is commensurate with demographic data. Competition for business loans remains strong in the AA.

Small Loans to Farms

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

The OCC compared the percentage of the number of small loans to farms originated or purchased by the bank in the four geographic income categories (low-, moderate-, middle-, and upper-income) to the distribution of farms throughout those geographies (demographic data), placing emphasis on the LMI geographies. The OCC also compared the bank's performance against the percentage of small loans to farms of other lenders (aggregate data), as demonstrated by CRA aggregate data.

In determining the conclusions, the OCC gave consideration for opportunities to lend based on the number of CTs in each income level, the level of competition, and the number farms located in the moderate-income CTs within the AA.

The bank's geographic distribution of small loans to farms is overall reasonable.

MSA AA

The bank's geographic distribution of small loans to farms is reasonable given the demographics of the AA. The percentage of small loans to farms originated or purchased by the bank in moderate-income CTs is below both aggregate and demographic data but is overall reasonable. Competition for farm loans remains strong in the AA, with John Deere Financial, F.S.B holding 40 percent of the farm market share as of the 2020 Peer Small Farm Data and approximately 29 percent of the market share as of the 2019 Peer Small Farm Data.

Non-MSA AA

The bank did not originate a sufficient volume of farm loans in the Non-MSA AA during the three-year evaluation period for a meaningful analysis.

Lending Gap Analysis

Overall, the OCC did not identify any unexplained, conspicuous gaps in the lending distribution. The OCC reviewed internal bank reports and maps to identify potential significant gaps in the distribution of loans over the evaluation period.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes given the product lines offered by the bank.

Of note, there are two prisons in the Non-MSA AA in Ross County, the Chillicothe Correctional Institute and the Ross Correctional Institute. The Pickaway Correctional Institute/Orient State Prison is in Pickaway County in the MSA AA. We considered this information in the analysis.

Home Mortgage Loans

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

The OCC compared the percentage of home mortgage loans originated or purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level (demographic data), placing emphasis on lending to LMI families. The OCC also compared the bank's performance against home mortgage loans of other home mortgage lenders (aggregate data), as demonstrated by HMDA aggregate data.

The bank exhibits a reasonable distribution of home mortgage loans among borrowers of different income levels in the AAs.

In evaluating the borrower distribution of home mortgage loans, the OCC considered the level of competition and its effect on limiting the bank's ability to lend to borrowers of different incomes, as well as the economic conditions in the AA, especially during the COVID-19 pandemic. The

OCC also considered the percentage of families that live below the poverty level, and the barriers this creates for these families to qualify for home mortgage financing.

MSA AA

KNB's distribution of home mortgage loans by borrower income level in the MSA AA reflects an overall reasonable distribution. KNB's percentage of home mortgage loans to low-income borrowers exceeds aggregate data but is below the percentage of families (demographic data). KNB's percentage of home mortgage loans to moderate-income borrowers is below both aggregate and demographic data but is overall reasonable.

The OCC considered other factors in the bank's performance during the evaluation period, including the cost of homeownership in the AA as an obstacle to homeownership for LMI borrowers. As stated above, overall median housing values are 2.6 to 4.1 times the weighted average of median family income of LMI families in the AA. This obstacle may result in fewer opportunities to originate mortgage loans to LMI families. Approximately 8.6 percent of the families live below the poverty level.

There is strong competition for loans in the AA. As stated above, KNB's home mortgage market share of 1.8 percent as of the 2021 Peer Mortgage Data ranks them 14th out of 231 lenders in the AA, with the top five lenders accounting for almost 23 percent of the market share.

Non-MSA AA

KNB's distribution of home mortgage loans by borrower income level in the Non-MSA AA reflects an overall reasonable distribution. KNB's percentage of home mortgage loans to low-income borrowers exceeds aggregate data but is below demographic data. KNB's percentage of home mortgage loans to moderate-income borrowers is below both aggregate and demographic data but is overall reasonable.

The OCC considered other factors in the bank's performance during the evaluation period, including the cost of homeownership in the AA as an obstacle to homeownership for LMI borrowers. As stated above, overall median housing values are 2.4 to 3.9 times the weighted average of median family income of LMI families in the AA. This obstacle may result in fewer opportunities to originate mortgage loans to LMI families. Approximately 14 percent of the families live below the poverty level.

There is strong competition for loans in the AA. As stated above, KNB's home mortgage market share of 3.2 percent as of the 2021 Peer Mortgage Data ranks them 9th out of 174 lenders in the AA, with the top five lenders accounting for almost 32 percent of the market share.

Small Loans to Businesses

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

The OCC compared the percentage distribution of the number of small loans to businesses originated or purchased by the bank by gross annual revenue level to businesses with gross annual revenues of \$1 million or less (demographic data). The OCC also compared the bank's performance to aggregate small business data (aggregate data), as demonstrated by CRA aggregate data.

In evaluating the borrower distribution of small loans to businesses of different sizes, the OCC considered the level of competition and its effect on limiting the bank's ability to lend, as well as the economic conditions in the AA.

The bank's distribution of small loans to businesses of different sizes is excellent. As evidenced in Table R in the state of Ohio section of Appendix D, the bank's percentage of small loans to businesses with gross annual revenues of \$1 million or less exceeded both demographic and aggregate data for each AA.

MSA AA

KNB exhibits an excellent distribution of small loans to businesses of different sizes within the MSA AA. The bank's percentage of small loans to businesses with gross annual revenues of \$1 million or less significantly exceeded both aggregate lending data and the percentage of businesses in the AA (demographic data).

Non-MSA AA

KNB exhibits an excellent distribution of small loans to businesses of different sizes within the Non-MSA AA. The bank's percentage of small loans to businesses with gross annual revenues of \$1 million or less significantly exceeded aggregate data, as well as exceeding demographic data.

Small Loans to Farms

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

The OCC compared the percentage distribution of the number of small loans to farms originated or purchased by the bank by gross annual revenue level to farms with gross annual revenues of \$1 million or less (demographic data). The OCC also compared the bank's performance to aggregate small farm data (aggregate data), as demonstrated by CRA aggregate data.

In evaluating the borrower distribution of small loans to farms of different sizes, the OCC considered the level of competition and its effect on limiting the bank's ability to lend, as well as the economic conditions in the AA.

The bank's distribution of small loans to farms of different sizes is excellent. As evidenced in Table T in the state of Ohio section of Appendix D, the bank's percentage of small loans to farms with gross annual revenues of \$1 million or less exceeded aggregate data for each AA.

MSA AA

KNB exhibits an excellent distribution of small loans to farms of different sizes within the MSA AA. The bank's percentage of small loans to farms with gross annual revenues of \$1 million or less significantly exceeded aggregate lending data but was below demographic data. According to the 2020 Peer Small Farm Data, the top five lenders account for about 81 percent of the farm market share. These lenders are larger financial institutions.

Non-MSA AA

The bank did not originate a sufficient volume of farm loans in the Non-MSA AA during the three-year evaluation period for a meaningful analysis. However, all the farm loans in the loan sample were to small farms with gross annual revenues of \$1 million or less, which exceeded both demographic and aggregate lending data.

Responses to Complaints

KNB has not received any complaints about its performance in helping to meet the AAs' credit needs during the evaluation period.

Community Development Test

The bank's performance under the Community Development Test in the state of Ohio is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank exhibits excellent responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AAs.

KNB was particularly responsive to the current COVID-19 pandemic and its level of CD loans were highly impactful. The OCC placed more weight on CD lending, given the bank's excellent responsiveness to the COVID-19 crisis and volume of CD loans made in response to the COVID-19 pandemic.

KNB was an intermediate small bank in 2020; however, the bank was a small bank for CRA purposes in 2019 and 2021. KNB provided CD loans, investments, and services information for 2020 and 2021 for review during this CRA evaluation. Therefore, the totals for CD activities listed below are for those two years only during the evaluation period.

Number and Amount of Community Development Loans

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

The number and dollar amount of qualified CD loans represent excellent responsiveness. During the evaluation period, KNB originated 701 qualified CD loans inside their AAs totaling \$22.3 million, which equates to almost 50 percent of total tier 1 capital as of December 31, 2021. Additionally, the bank originated 226 CD loans in the broader/statewide or regional area of Ohio, totaling \$4.1 million.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
MSA AA	477	51.4	9,956	37.6
Non-MSA AA	224	24.2	12,373	46.8
Broader/Regional Area (Ohio) with Indirect Benefit	226	24.4	4,118	15.6

MSA AA

KNB originated 477 CD loans totaling almost \$10 million in the MSA AA, which equates to 72 percent of allocated (based on total deposits in the MSA AA) tier 1 capital. This demonstrates excellent responsiveness. In 2021, KNB originated approximately 476 SBA PPP loans totaling \$9.5 million to help businesses keep their workforces employed during the COVID-19 pandemic. The PPP loans particularly helped revitalize or stabilize LMI areas and promoted economic development in these areas. The PPP loans are innovative, flexible loan products, given the current COVID-19 crisis. The 2021 PPP loans met the CD definition in place at the time of origination. The bank was particularly responsive to the community's needs in the MSA AA with the origination of PPP loans.

Additionally, KNB originated one CD loan totaling approximately \$427,500 to an organization that provides CD services to LMI individuals and families.

Non-MSA AA

KNB originated 224 CD loans totaling \$12.4 million in the Non-MSA AA, which equates to almost 40 percent of allocated (based on total deposits in the Non-MSA AA) tier 1 capital. This demonstrates excellent responsiveness. In 2021, KNB originated 218 SBA PPP loans totaling \$10.4 million to help businesses keep their workforces employed during the COVID-19 pandemic. The PPP loans particularly helped revitalize or stabilize LMI areas and promoted economic development in these areas. The PPP loans are innovative, flexible loan products, given the current COVID-19 crisis. The 2021 PPP loans met the CD definition in place at the time of origination. The bank was particularly responsive to the community's needs in the Non-MSA AA with the origination of PPP loans.

Among the other six CD loans originated totaling almost \$2 million, four were provided to the same organization that provides CD services to LMI individuals and families and two were SBA PPP loans originated in 2020 that met the definition of CD at the time of origination.

Statewide/Regional Area of Ohio

KNB is adequately responsive to the CD needs in its AAs so additional consideration was given to 226 CD loans, totaling \$4.1 million, in the broader/statewide area of Ohio. The bank originated 225 PPP loans in 2021 outside their AAs but in Ohio totaling \$4.1 million. Additionally, the bank originated one CD loan totaling \$50,000 to an organization that provides CD services to LMI individuals and families. The bank’s lending in the broader/statewide area represents 9.2 percent of the bank’s total tier 1 capital, demonstrating excellent responsiveness.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000’s)	#	\$(000’s)	#	% of Total #	\$(000’s)	% of Total \$	#	\$(000’s)
MSA AA	0	0	10	9	10	41.7	9	28.1	0	0
Non-MSA AA	0	0	14	23	14	58.3	23	71.9	0	0

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

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

The Qualified Investment Table, shown above, sets forth the information and data used to evaluate the bank’s level of qualified CD investments. The table includes all CD investments, including prior period investments that remain outstanding as of the examination date.

KNB’s qualified CD investment activity represents adequate responsiveness. The bank made a total of 24 donations totaling approximately \$32,206 in 2020 and 2021, which equates to less than 1 percent of total tier 1 capital as of December 31, 2021.

MSA AA

In the MSA AA, the bank’s level of CD investments is adequate given the asset size and the capacity of the bank in this AA. During the evaluation period (2020 – 2021), KNB made ten qualifying donations totaling approximately \$9,056 in the MSA AA, which equates to 0.1 percent of allocated tier 1 capital based on total deposits in the AA. The donations supported various food pantries and domestic violence/homeless shelters for women and children in the area.

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

Non-MSA AA

In the Non-MSA AA, the bank's level of CD investments is adequate given the asset size and the capacity of the bank in this AA. During the evaluation period (2020 – 2021), KNB made 14 qualifying donations totaling approximately \$23,150 in the Non-MSA AA, which equates to 0.1 percent of allocated tier 1 capital based on total deposits in the AA. The donations supported various food pantries, small business/minority economic development, child protection services, and financial literacy in the area.

Extent to Which the Bank Provides Community Development Services

CD services provided by KNB represent adequate responsiveness to CD needs within the AAs. Various KNB officers and employees serve on community organizations that are active in providing CD services targeted to LMI individuals and families, affordable housing needs, or promoting economic development within the community. Bank officers and employees are involved with over 20 organizations providing leadership roles in many of the organizations. Officers and employees serve on boards or other roles at many of the CD organizations providing technical assistance and expertise. Positions held by bank personnel include, but are not limited to, treasurer, president, and board member.

KNB's delivery systems are accessible to geographies and individuals of different income levels throughout the AAs. KNB compliments its traditional service delivery methods with certain alternative delivery channels, including online banking, mobile banking, telephone banking, and ATMs. In total, two of the six branches are in moderate-income CTs (both in the MSA AA).

MSA AA

KNB's responsiveness to CD needs in the MSA AA through CD services is adequate. Within the AA, nine employees provided CD services to 11 different organizations, with many on an annual basis. In the AA, a few employees participated in more than one CD service. Of the services performed, four demonstrated leadership by serving on the board or in a leadership capacity (president, treasurer, etc.). Bank officers and employees served the community by providing financial education regarding elder abuse, financial literacy expertise, or financial expertise to CD organization that provide CD services targeted to LMI individuals or families. Two bank employees were active in the bank's AC Savers Club that provides banking services in local schools (grades pre-kindergarten through fifth grade). KNB serves the MSA AA with three branches, with two in moderate-income CTs.

Non-MSA AA

KNB's responsiveness to CD needs in the Non-MSA AA through CD services is adequate. Within the AA, seven employees provided CD services to nine different organizations, with many on an annual basis. In the AA, a few employees participated in more than one CD service. Of the services performed, five demonstrated leadership by serving on the board or in a leadership capacity (president, treasurer, etc.). Bank officers and employees served the community by providing financial education regarding elder abuse, financial literacy expertise (through Junior Achievement), or financial expertise to CD organizations that provide CD

services targeted to LMI individuals or families. Bank personnel also serve on community organizations that are active in providing CD qualified services that promote economic development or revitalization or stabilization in LMI areas. KNB serves the Non-MSA AA with three branches, with all branches in middle- or upper-income CTs.

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 metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed:	01/01/19 – 12/31/21	
Bank Products Reviewed:	Home mortgage, small business, and small farm CD loans, qualified investments, CD services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Ohio		
MSA AA	Full-scope	This AA includes Pickaway County, in its entirety, and CTs 325 and 326 in Fairfield County and CT 9650 in Hocking County. This AA is in the Columbus, OH MSA 18140.
Non-MSA AA	Full-scope	This AA includes Ross County, in its entirety, which is in a non-MSA in Ohio.

Appendix B: Summary of State Ratings

RATINGS: KINGSTON NATIONAL BANK			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State Rating
Kingston National Bank (KNB)	Satisfactory	Outstanding	Satisfactory
State:			
Ohio	Satisfactory	Outstanding	Satisfactory

(*) The Lending Test and Community Development Test carry equal weight in the overall rating.

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

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

- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

State of Ohio

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
MSA AA	219	36,029	47.9	4,252	0.0	0.0	0.0	32.0	44.3	27.6	62.1	49.8	68.0	5.9	5.9	4.4	0.0	0.0	0.0	
Non-MSA AA	238	34,610	52.1	2,763	0.0	0.0	0.0	19.0	16.0	14.8	62.4	49.6	63.0	18.6	34.5	22.2	0.0	0.0	0.0	
Total	457	70,639	100.0	7,015	0.0	0.0	0.0	25.2	29.5	22.6	62.3	49.7	66.1	12.5	20.8	11.4	0.0	0.0	0.0	

Source: 2015 ACS Census; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0%.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
MSA AA	219	36,029	47.9	4,252	21.4	7.8	7.4	20.0	15.1	21.1	23.5	22.4	24.8	35.1	47.5	27.7	0.0	7.3	19.0	
Non-MSA AA	238	34,610	52.1	2,763	22.9	5.9	5.2	18.7	10.9	16.4	20.1	16.4	22.9	38.3	48.7	33.4	0.0	18.1	22.0	
Total	457	70,639	100.0	7,015	22.2	6.8	6.6	19.4	12.9	19.3	21.7	19.3	24.0	36.7	48.1	30.0	0.0	12.9	20.2	

Source: 2015 ACS Census; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0%.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2019-21	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
MSA AA	21	3,840	40.4	805	0.0	0.0	0.0	40.0	66.7	34.4	54.3	33.3	61.5	5.5	0.0	4.1	0.2	0.0	0.0		
Non-MSA AA	31	7,246	59.6	731	0.0	0.0	0.0	39.4	38.7	36.8	46.9	38.7	49.9	13.7	22.6	13.3	0.0	0.0	0.0		
Total	52	11,086	100.0	1,536	0.0	0.0	0.0	39.7	50.0	35.5	50.5	36.5	56.0	9.7	13.5	8.5	0.1	0.0	0.0		

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0%.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2019-21	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
MSA AA	21	3,840	40.4	805	83.0	95.2	38.9	4.2	4.8	12.7	0.0		
Non-MSA AA	31	7,246	59.6	731	79.0	83.9	33.2	4.7	16.1	16.3	0.0		
Total	52	11,086	100.0	1,536	81.0	88.5	36.2	4.5	11.5	14.6	0.0		

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0%.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019-21	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000s)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
MSA AA	22	5,234	66.7	62	0.0	0.0	0.0	35.5	18.2	27.4	51.8	45.5	48.4	12.7	36.4	24.2	0.0	0.0	0.0	
Non-MSA AA	11	1,826	33.3	39	0.0	0.0	0.0	24.9	0.0	12.8	56.8	63.6	79.5	18.3	36.4	7.7	0.0	0.0	0.0	
Total	33	7,060	100.0	101	0.0	0.0	0.0	31.4	12.1	21.8	53.7	51.5	60.4	14.9	36.4	17.8	0.0	0.0	0.0	

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0%.*

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2019-21	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available			
	#	\$ (000S)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans		
MSA AA	22	5,234	66.7	62	97.8	86.4	22.6	1.6	13.6	0.5	0.0		
Non-MSA AA	11	1,826	33.3	39	99.1	100.0	41.0	0.9	0.0	0.0	0.0		
Total	33	7,060	100.0	101	98.3	90.9	29.7	1.3	9.1	0.3	0.0		

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0%.*