



PUBLIC DISCLOSURE

August 25, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First National Bank of Grayson
Charter Number: 12982

200 S. Carol Malone Boulevard
P.O. Box 67
Grayson, Kentucky 41143

Office of the Comptroller of the Currency

10200 Forest Green Blvd, Suite 501
Louisville, Kentucky 40223

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 Lending Test is rated Satisfactory.

The major factors that support this rating include:

- The Lending Test rating for The First National Bank of Grayson (FNB Grayson, bank, or institution) is based on the ratings of the state of Kentucky.
- The bank's loan-to-deposit (LTD) ratio is reasonable considering the bank's size, financial condition, and credit needs in its assessment areas (AAs).
- A majority of the bank's loans were originated or purchased inside the bank's AAs.
- The bank exhibited excellent geographic distribution of loans in the bank's AAs.
- The bank exhibited reasonable distribution of loans to individuals of different income levels, given the product lines offered by the bank.

Loan-to-Deposit Ratio

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

The LTD ratio was calculated on a bank wide basis covering the quarters as of June 30, 2022, through December 31, 2024. The bank's average quarterly LTD ratio for 11 consecutive quarters is 65.0 percent. This was below the average quarterly LTD ratio of 72.8 percent for similar asset-sized institutions during the same time period. The bank's average quarterly LTD ratios ranged from a low of 58.3 percent to a high of 69.9 percent. The average quarterly LTD ratio of FNB Grayson compares favorably with other Kentucky institutions of similar asset size. The LTD ratios of the similar asset-sized institutions ranged from an average quarterly low of 50.8 percent to an average quarterly high of 124.7 percent.

Lending in Assessment Area

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

The bank originated and purchased 77.3 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. Loans inside the AAs are factored into the overall lending gap analysis of the geographic distribution of lending by income level of geography.

Table 1: Lending Inside and Outside of the Assessment Area										2022-2024
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	320	77.3	94	22.7	414	39,046	61.9	24,080	38.1	63,126
Total	320	77.3	94	22.7	414	39,046	61.9	24,080	38.1	63,126
Source: 1/1/2022 - 12/31/2024 Bank Data. Due to rounding, totals may not equal 100.0%										

Description of Institution

The FNB Grayson was established in 1902 and is a wholly owned subsidiary of First Grayson Bancorp Inc., a one-bank holding company located in Grayson, Kentucky. FNB Grayson is an intrastate community bank headquartered in Grayson, Kentucky that serves the counties of Boyd, Carter, Elliot, Morgan, and Rowan. FNB Grayson operates seven bank office locations, three in Carter County, one in Boyd County, one in Morgan County, one in Rowan County and one in Elliott County.

The bank has four branches in Boyd and Carter counties in the Huntington AA and three branches in Elliott, Morgan, and Rowan counties in the Kentucky non-MSA AA. The main office is located in a moderate-income census tract (CT) in Carter County. The Grayson and Olive Hill Branches are located in middle-income CTs in Carter County. The Cannonsburg Branch is located in a middle-income CT in Boyd County. The Sandy Hook Branch is located in a moderate-income CT in Elliot County. The West Liberty Branch is located in a middle-income CT in Morgan County. The Morehead Branch is located in an upper-income CT in Rowan County. The Willard Branch, located in middle-income CT was closed April 15, 2022. The bank did not open or close other branches in the evaluation period. There were no mergers or acquisitions during the evaluation period.

Full-service banking is provided at the main office and at each branch, which includes drive-through and lobby services. Extended banking hours are available during the business week and on Saturday at each location, except the Grayson Branch. Automated Teller Machines (ATMs) are located at the main office and at each branch. Three stand-alone ATMs are located at two gas stations/convenience stores and at a local university in Carter County, Kentucky, within the Huntington AA. Two of the stand-alone ATMs are located in a moderate-income CT and the third stand-alone ATM is located in a middle-income CT. The ATMs located at the Olive Hill and Morehead branches accept deposits.

The bank offers an array of retail and commercial banking services. Consumer products include checking accounts, savings programs, money market accounts, certificate of deposit, and Individual Retirement Accounts. Additionally, the bank offers mortgage loans, auto loans, personal loans, installment loans, and overdraft checking protection. The bank's commercial services include business checking, savings, and money market accounts. In addition, the bank provides commercial and industrial loans, commercial real estate loans, and construction and development loans. The bank's internet website, <https://fnbgrayson.com>, provides detailed information on products and services for both consumers and businesses, bank locations, and hours of operation for each office.

Residential mortgage loans remain the bank's primary loan product. There are no variances in the bank's business strategies or product offerings across the AAs.

FNB Grayson reported total assets of \$361.9 million, \$210.5 million in gross loans, \$320.9 million in total deposits, and tier 1 capital of \$41.7 million, as of December 31, 2024.

Loans as a percentage of total assets were 52.71 percent, as of December 31, 2024. The distribution of the loan portfolio was 37.8 percent in 1-4 family residential real estate, 23.3 percent in non-farm and nonresidential loans, and 16.6 percent in loans to individuals. The remaining 22.4 percent was distributed between construction and land development, commercial and industrial loans, multi-family residential real estate, farmland, agriculture, and other loans.

A satisfactory CRA rating was assigned during the prior CRA performance evaluation dated July 8, 2019. There are no financial, legal constraints, or other conditions that would hinder the bank's ability to help meet the credit needs of its AA.

Scope of the Evaluation

Evaluation Period/Products Evaluated

FNB Grayson was evaluated using Small Bank CRA procedures. This Performance Evaluation assesses the bank's performance under the Lending Test for the period January 1, 2022, through December 31, 2024. The OCC selected home mortgage loans as the primary loan product based on total loans originated during the evaluation period and discussions with bank management. The bank is a Home Mortgage Disclosure Act (HMDA) reporter; therefore, all home mortgage loans reported on the bank's 2022, 2023, and 2024 HMDA Loan Application Registers (LARs) were considered.

Due to updated American Community Survey (ACS) 2020 Census data, 2020 CT income level designation changes became effective January 1, 2022. Examiners evaluated FNB Grayson's loan data against the applicable demographic data for each period, resulting in multiple analyses and presentation of data. Examiners analyzed home mortgage lending performance from January 1, 2022, through December 31, 2023 (2022-2023 evaluation period), using 2020 U.S. Census Demographic information.

During the evaluation period, Metropolitan Statistical Area (MSA) boundary changes, effective July 21, 2023, by the United States Office of Management and Budget (OMB) resulted in the need for additional analysis for some AAs under the Lending Test. Both the geographic and borrower income distribution criteria for those AAs affected by the OMB changes received separate analyses based on 2024 data and the data are presented separately in the tables.

Small loans to businesses, small farm loans, and multi-family loans were not a primary loan product for this evaluation period because the bank originated a minimal number of these loans. Therefore, we did not complete a loan sample of these products for analysis.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state were selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA), 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 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 rating 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 weighted-average conclusions in those AAs. Refer to the "Scope" section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 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 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 (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.

State Rating

State of Kentucky

CRA rating for the State of Kentucky: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The geographic distribution of loans is excellent.
- The distribution of loans to borrowers of different income levels is reasonable.

Description of Institution's Operations in Kentucky

FNB Grayson had two AAs within the state of Kentucky rating area. These AAs were the Huntington-Ashland, WV-KY-OH MSA AA, and the Kentucky non-MSA AA. Refer to Appendix A, for the geographies that make up the AAs. All AAs for the state of Kentucky meet the requirements of the CRA regulation and did not arbitrarily exclude any low- or moderate-income CTs.

The Huntington-Ashland, WV-KY-OH MSA AA CT income designations changed during the evaluation period. In 2022-2023, the AA consisted of zero low-, seven moderate-, fourteen middle-, and three upper-income CTs per the 2020 US Census. In 2024, the AA consisted of zero low-, six moderate-, fourteen middle-, and four upper-income CTs per the 2024 ACS Census.

The FDIC Summary of Deposits Report as of June 30, 2024, listed four offices located in the Huntington-Ashland, WV-KY-OH MSA AA during the evaluation period, with total deposits of \$219.9 million, in the AA, or 75.8 percent of total bank deposits. Total home mortgage loans originated in the AA were 187 loans, or 45.2 percent of the total home mortgage loan originations for the bank during the evaluation period.

Competition for mortgage loans is strong and includes local commercial and savings banks, branches of larger regional and nationwide banks, and national mortgage lenders. Based on the most recent 2023 Peer Mortgage Data, there were 123 lending institutions within the AA competing for mortgage applications. The top five lenders, with combined market share of 37.42 percent by count, are Commercial Bank of Grayson, City National Bank of West Virginia, United Wholesale Mortgage, Members Choice Credit Union, and Rocket Mortgage. FNB Grayson ranked ninth with market share of 3.69 percent.

A review of the June 30, 2024, Federal Deposit Insurance Corporation (FDIC) Summary of Deposits Market Share Report for Boyd and Carter County, Kentucky within the Huntington-Ashland, WV-KY-OH MSA indicated there are 25 offices, representing nine FDIC-insured institutions varying in asset size. FNB Grayson ranked second with a deposit market share of 14.77 percent. City National Bank of West Virginia ranked first with a deposit market share of 16.13 percent.

Huntington-Ashland, WV-KY-OH MSA AA

Assessment Area(s) - Huntington-Ashland, WV-KY-OH MSA						
2022 - 2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	23	0.00	30.43	56.52	13.04	0.00
Population by Geography	74,888	0.00	25.53	63.75	10.72	0.00
Housing Units by Geography	34,172	0.00	27.09	63.54	9.38	0.00
Owner-Occupied Housing by Geography	19,896	0.00	21.64	66.56	11.80	0.00
Occupied Rental Units by Geography	7,941	0.00	38.18	57.49	4.33	0.00
Vacant Units by Geography	6,335	0.00	30.28	61.63	8.10	0.00
Businesses by Geography	2,531	0.00	40.06	50.22	9.72	0.00
Farms by Geography	93	0.00	27.96	67.74	4.30	0.00
Family Distribution by Income Level	18,664	24.58	17.12	21.06	37.24	0.00
Household Distribution by Income Level	27,837	27.58	15.00	15.93	41.49	0.00
Unemployment rate (%)	6.98	0.00	8.59	6.80	4.97	0.00
Households Below Poverty Level (%)	20.49	0.00	34.81	16.63	7.02	0.00
Median Family Income (26580 - Huntington-Ashland, WV-KY-OH MSA)		\$61,976	Median Housing Value			\$119,800
Median Family Income (26580 - Huntington-Ashland, WV-KY-OH MSA) for 2023		\$73,700	Median Gross Rent			\$684
			Families Below Poverty Level			15.28
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						

Assessment Area(s) - Huntington-Ashland, WV-KY-OH MSA						
2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	23	0.00	26.09	56.52	17.39	0.00
Population by Geography	74,888	0.00	23.12	60.28	16.61	0.00
Housing Units by Geography	34,172	0.00	24.18	60.60	15.22	0.00
Owner-Occupied Housing by Geography	19,896	0.00	18.53	63.11	18.37	0.00
Occupied Rental Units by Geography	7,941	0.00	37.14	53.15	9.71	0.00
Vacant Units by Geography	6,335	0.00	25.68	62.07	12.25	0.00
Businesses by Geography	2,528	0.00	38.77	48.42	12.82	0.00
Farms by Geography	97	0.00	22.68	70.10	7.22	0.00
Family Distribution by Income Level	18,664	23.94	16.96	20.72	38.38	0.00
Household Distribution by Income Level	27,837	27.11	14.90	15.69	42.29	0.00
Unemployment rate (%)	6.98	0.00	8.29	6.84	6.03	0.00
Households Below Poverty Level (%)	20.49	0.00	35.21	17.57	9.51	0.00
Median Family Income (26580 - Huntington-Ashland, WV-KY-OH MSA)		\$60,822	Median Housing Value			\$119,800
Median Family Income (26580 - Huntington-Ashland, WV-KY-OH MSA) for 2024		\$74,300	Median Gross Rent			\$684
			Families Below Poverty Level			15.28
FFIEC File - 2024 Census 2024 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						

Employment and Economic Factors

According to the U.S. Bureau of Labor Statistics (BLS), the unemployment rate increased throughout the evaluation period in Boyd County in the AA. In January 2022, the rate for Boyd County was 5.4 percent compared to 6.2 percent in December 2024. The unemployment rate in Carter County was 8.6 percent in January 2022, compared to 8.3 percent in December 2024. The unemployment rate in the AA was higher than the overall rate for the state of Kentucky, which was 5.1 percent at the end of the evaluation period. The national unemployment rate was 4.0 percent in January 2022 and 4.1 percent in December 2024.

Moody's Analytics Report as of December 2024, reported that Huntington-Ashland continues to trail the US. The unemployment rate was higher than before the pandemic while the majority of the US continues to add jobs. The area saw losses in the large public sector, manufacturing, and hospitality. There was roughly a 6.0 percent gain in healthcare employment, but not enough to offset the losses. Meanwhile, housing market metrics mirror those of the nation, with price appreciation at decade highs. Barring strong investment from higher-value-added industries, rural counties will struggle to reverse course and will experience continued out-migration in the years ahead. The largest industries in the Huntington-Ashland WV-KY-OH MSA are Education and Health Services, Government, and Retail Trade. The top employers in the AA are King's Daughters Medical Center, Cabell-Huntington Hospital, St. Mary's Medical Center, Marshall University, Marathon Petroleum, Toyota Motor Corporation, and the Huntington Veterans Administration Medical Center.

Housing

In the performance context, examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the information in the above table for 2022-2023, low-income families earned less than \$36,850, and moderate-income families earned less than \$58,960, based on the FFIEC File-2020 Census updated for 2023. Based on the information in the above table for 2024, low-income families earned less than \$37,150, and moderate-income families earned less than \$59,440, based on the FFIEC File 2020 Census updated for 2024. The median housing value in the AA was \$119,800 for 2022-2024.

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 \$921 for a low-income borrower and \$1,474 for a moderate-income borrower using 2023 data. The calculated maximum affordable monthly mortgage payment was \$929 for a low-income borrower and \$1,486 for a moderate-income borrower using 2024 data.

Assuming a 30-year mortgage with a six percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$37,150 per year (or less than 50 percent of the 2023 FFIEC adjusted median family income in the AA) could afford a \$154,908 mortgage with a payment of \$929 per month. A moderate-income borrower making \$59,440 per year (or less than 80 percent of the 2023 FFIEC adjusted median family income in the AA) could afford a \$247,852 mortgage with a payment of \$1,486 per month. This illustrates that low- and moderate-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$1,099. The median housing value in the AA was \$145,000 and \$204,750 in 2022 and 2024 reflecting a percent change of 41.21 percent from 2022 to 2024 according to Realtor.com data.

Community Contact

As part of our evaluation, the OCC reviewed one community contact performed by the OCC for a nonprofit organization that provides home construction services in the AA. According to the King's Daughters Medical Center's 2022 Community Health Needs Assessment, 22 percent of Boyd County households are cost burdened, and 23 percent of housing units have one or more substandard conditions. The survey also identified the top "weaknesses" in the community include Poverty, Lack of Affordable Healthy Food, Poor Housing Quality, Lack of Availability of Mental Health Care, and Lack of Transportation Services. The contact stated opportunities for participation by local financial institutions, such as providing competitive lines of credit, granting commitments to build homes, e.g. through "Bankers and Brokers Initiative" that divides the bill between several institutions, volunteering for Homeowner selection committee, and volunteering for Financial Education seminars.

Scope of Evaluation in Kentucky

The Huntington-Ashland, WV-KY-OH MSA AA received a full-scope review. The AA accounted for 75.8 percent of total bank deposits, and 57.1 percent of total bank branches. Home mortgage loans received equal weighting for the geographic and borrower distribution analysis. Refer to the table in Appendix A for a list of all AAs under review.

Census Demographic Changes

During the evaluation period, changes in the ACS resulted in changes to geographic income classifications for low-, moderate-, middle-, and upper- income CT. Performance tables in appendix D reflect these changes with combined 2022-2023 performance tables and separate 2024 performance tables. However, all performance was considered in arriving at our overall conclusions and ratings. Refer to the Ratings section for more information on AA ratings considerations.

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Huntington-Ashland, WV-KY-OH MSA was reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibited excellent geographic distribution of loans in the State.

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.

2022-2023

The percentage of loans in the moderate-income tracts exceeded the percent of owner-occupied housing units and exceeded the aggregate percentage of all reporting lenders. There are no low-income tracts in the AA.

2024

The percentage of loans in the moderate-income tracts exceeded the percent of owner-occupied housing units. There are no low-income tracts in the AA. The 2024 Peer Mortgage data was not available during the evaluation; therefore, comparative analysis was not completed.

Lending Gap Analysis

The OCC evaluated the lending distribution in the Huntington-Ashland, WV-KY-OH MSA AA to determine if any unexplained, conspicuous gaps existed. The OCC reviewed summary reports, maps, and analyzed FNB Grayson's lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. The OCC did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a reasonable distribution of loans to individuals of different income levels, 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.

2022-2023

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

2024

The percentage of loans to low-income borrowers was below the percentage of low-income families. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families. The 2024 Peer Mortgage data was not available during the evaluation; therefore, comparative analysis was not completed.

Responses to Complaints

FNB Grayson did not receive any complaints about its performance in helping to meet credit needs in the state of Kentucky during this evaluation period. This had a neutral impact on the bank's CRA evaluation

Conclusions for Area Receiving a Limited Scope Review

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

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	01/01/2022 – 12/31/2024	
Bank Products Reviewed:	Home Mortgage Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	None	None
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Kentucky		
Huntington-Ashland, WV-KY-OH MSA	Full scope	Boyd and Carter County in the entirety in the state of Kentucky
Kentucky Non-MSA	Limited scope	Elliott, Morgan, and Rowan Counties in the entirety in the state of Kentucky

Appendix B: Summary of MMSA and State Ratings

RATINGS	
Overall Bank:	Lending Test Rating:
The First National Bank of Grayson	Satisfactory
State:	
Kentucky	Satisfactory

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/AA.

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 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/AA.

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

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/AA. 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 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 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		
Huntington-Ashland, WV-KY-OH MSA	135	16,396	59.47	3,071	--	0.00	--	21.64	26.67	19.80	66.56	67.41	69.85	11.80	5.93	10.35	--	0.00	--		
Kentucky non-MSA	92	11,649	40.53	990	--	0.00	--	31.20	36.96	25.56	38.78	31.52	27.07	30.03	31.52	47.37	--	0.00	--		
Total	227	28,045	100.00	4,061	--	0.00	--	25.01	30.84	21.20	56.77	52.86	59.42	18.22	16.30	19.38	--	0.00	--		
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 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2024
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
Huntington-Ashland, WV-KY-OH MSA	52	6,459	55.91	--	--	0.00	--	18.53	32.69	--	63.11	57.69	--	18.37	9.62	--	--	0.00	--
Kentucky non-MSA	41	4,542	44.09	--	--	0.00	--	31.20	46.34	--	38.78	21.95	--	30.03	31.71	--	--	0.00	--
Total	93	11,001	100.00	--	--	0.00	--	22.99	38.71	--	54.53	41.94	--	22.48	19.35	--	--	0.00	--
Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, -- 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
Huntington-Ashland, WV-KY-OH MSA	135	16,396	59.47	3,071	24.58	15.56	8.89	17.12	14.07	19.34	21.06	22.96	23.15	37.24	40.00	31.26	--	7.41	17.36
Kentucky non-MSA	92	11,649	40.53	990	25.68	5.43	4.75	16.84	9.78	13.03	15.25	26.09	25.25	42.23	47.83	44.65	--	10.87	12.32
Total	227	28,045	100.00	4,061	24.97	11.45	7.88	17.02	12.33	17.80	19.02	24.23	23.66	38.99	43.17	34.52	--	8.81	16.13
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																			2024
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
Huntington-Ashland, WV-KY-OH MSA	52	6,459	55.91	--	23.94	13.46	--	16.96	21.15	--	20.72	13.46	--	38.38	44.23	--	--	7.69	--
Kentucky non-MSA	41	4,542	44.09	--	25.34	12.20	--	16.63	9.76	--	15.28	17.07	--	42.76	46.34	--	--	14.63	--
Total	93	11,001	100.00	--	24.43	12.90	--	16.84	16.13	--	18.80	15.05	--	39.92	45.16	--	--	10.75	--
Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, -- HMDA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			