



PUBLIC DISCLOSURE

August 11, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Consumers National Bank
Charter Number: 15543

614 East Lincoln Way
Minerva, OH 44657

Office of the Comptroller of the Currency

Cleveland-Pittsburgh-Detroit Field Office
200 Public Square, Suite 1610
Cleveland, OH 44114-2301

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 community development test is rated: Outstanding

The major factors that support this rating include:

- The Lending Test rating is based on the reasonable distribution of home mortgage loans to businesses among borrowers of different incomes, reasonable geographic distribution of home mortgages, a substantial majority of loans in their assessment areas (AAs), and a reasonable loan-to-deposit (LTD) ratio.
- The Community Development (CD) Test rating is based on an excellent responsiveness to community needs through qualified CD loans, investments and services and its capacity to participate.

Broader Statewide or Regional Area

- The bank is meeting the CD needs of the broader statewide or regional area. The bank has originated \$16.2 million in qualified CD loans in the broader statewide or regional area. These additional loans are focused on providing educational and child development services in the eastern Ohio area.

Loan-to-Deposit Ratio

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

Consumer National Bank's (CNB or bank) quarterly average LTC ratio of the 16 quarters since the prior Community Reinvestment Act (CRA) evaluation (January 1, 2022, through December 31, 2024) is 73.3 percent. The LTD ratio ranged from a low of 67.0 percent as of March 31, 2022, to a high of 77.8 as of March 31, 2024. The bank's quarterly average LTD ratio of 73.3 percent is reasonable compared to peer institutions within their AA. The peer group included four other institutions under \$5.0 billion in assets within the bank's AA. The quarterly average for the peer institutions over the evaluation period was 70.9 percent, with CNB maintaining the third highest quarterly average LTD ratio over the evaluation period. Additionally, there was strong competition from other financial institutions during the evaluation period.

Lending in Assessment Area

A substantial majority of the bank's loans were inside its AA(s).

The bank originated and purchased 84.6 percent of its total loans inside the bank's AAs during the evaluation period of 2022. The bank originated and purchased 86.8 percent of its total loans inside the

bank's AAs during the evaluation period of 2023 and 2024. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	143	84.62	26	15.38	169	27,004	57.20	20,206	42.80	47,210
Total	143	84.62	26	15.38	169	27,004	57.20	20,206	42.80	47,210

Source: 1/1/2022 - 12/31/2022 Bank Data.
Due to rounding, totals may not equal 100.0%

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	223	86.77	34	13.23	257	47,541	84.01	9,046	15.99	56,586
Total	223	86.77	34	13.23	257	47,541	84.01	9,046	15.99	56,586

Source: 1/1/2023 - 12/31/2024 Bank Data.
Due to rounding, totals may not equal 100.0%

Description of Institution

CNB is a full-service intrastate community bank headquartered in Minerva, Ohio. The bank is a wholly owned subsidiary of Consumers Bancorp, Inc., a one-bank holding company headquartered in Minerva, Ohio. As of December 31, 2024, the bank has \$1.1 billion in total assets. Tier 1 capital totaled \$92.6 million and represents 11.3 percent of total assets.

CNB operates 21 full-service branches, and one loan production center located in Northeastern Ohio. The bank expanded its AA during the examination period. As of 2022, the bank had five AAs including the Canton-Massillon MSA (metropolitan statistical area) AA, the Akron MSA AA, Weirton-Steubenville MSA AA, Wheeling MSA AA, and the Ohio non-MSA AA. In 2023 the bank added a sixth AA, the Youngstown-Warren MSA AA through the opening of a loan production center located in Mahoning County, Ohio. The bank's primary AA are the Canton-Massillon MSA AA which contains Stark County and Carroll County, and the Ohio non-MSA AA which contains Columbiana County. These two AAs combine for 74.9 percent of the bank's mortgage loan activity over the evaluation period.

CNB's primary loan products is real estate loans. As of the December 31, 2024, Consolidated Reports of Condition and Income and Uniform Bank Performance Reports, CNB's total loans equaled \$755.7 million. Over the evaluation period net loans and leases increased from \$616.9 million to \$755.7 million. As of December 31, 2024, the loan portfolio primarily consisted of non-farm non-residential (\$249.5 million), 1-4 family residential (\$193.84 million), commercial loans (\$91.8 million), and consumer loans (\$78.0 million). The bank offers a variety of traditional products and services through their full-service banking offices to accommodate their customers, including online and mobile banking. There are no substantial differences in the business focus or services offered between the bank's branches.

Presently, no legal or financial impediments exist that could restrict or affect CNB's ability to meet the credit needs of its AAs. The bank's previous CRA evaluation was as of July 18, 2022, and resulted in a "Satisfactory" rating.

Scope of the Evaluation

Evaluation Period/Products Evaluated

Examiners conducted a CRA performance evaluation to assess the bank's record of meeting the credit needs of its entire community, including low-to-moderate income (LMI) areas. The OCC performed a full-scope review using Intermediate Small Bank CRA examination procedures. This performance evaluation assesses CNB's record of meeting the credit and community development needs of its AAs. Examiners analyzed lending activity in full-year increments during the evaluation period, January 1, 2022, through December 31, 2024.

The bank's primary lending product is 1-4 family mortgage loans. Loans secured by real estate comprise 73.4 percent of the bank's loan portfolio. Of the real estate loan portfolio, 44.9 percent are secured by non-farm/non-residential real estate, 34.9 percent are secured by 1-4 family residential properties, 7.5 percent multifamily residential properties, 7.2 percent farmland, and 5.3 percent construction and development. Commercial loans not secured by real estate comprise 12.2 percent and other consumer loans comprise 10.3 percent of the portfolio. The remainder of the portfolio is comprised of small portfolios of agriculture loans and loans to individuals.

Based on the bank's internal reports for lending activity during the evaluation period and discussions with management, examiners determined that the bank's primary lending focus during the evaluation period was home mortgages. While the bank offers small business, small farm, and consumer installment loans, these products are not a primary focus for the bank, and as a result were not considered in this evaluation. Therefore, we did not evaluate the bank based on these loan products, as an analysis of this data would not be meaningful.

To evaluate the bank's performance, examiners used all Home Mortgage Disclosure Act (HMDA) for the years 2022, 2023, and 2024 to analyze the bank's home mortgage performance. For each AA, the OCC conducted separate analyses. For analysis purposes we compared the bank's lending performance to demographic data from the 2020 U.S. Census data, 2024 U.S. Census data, and 2024 Dun & Bradstreet SBSF Demographic data. No affiliate activity was included in the analysis. Examiners also considered information from community contacts to help assess the needs of the bank's AAs. 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 AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same MSA are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under 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.

CNB has six AAs in the State of Ohio. The AAs are as follows:

- Stark and Carroll Counties in their entirety in the Canton-Massillon MSA AA,

- Summit County in its entirety in the Akron MSA AA,
- Jefferson County in its entirety in the Weirton-Steubenville MSA AA,
- Columbiana County in its entirety and Harrison County census tracts (CTs) 9759 and 6760 in the Ohio non-MSA AA; and
- Mahoning County CTs 8130, 8132, 8133, 8134, 8135.02, and 8136.02 in the Youngstown-Warren MSA AA
- Wheeling MSA CTs 0101, 0103, 0120, and 0121.

Examiners completed a full-scope review for the Canton-Massillon MSA AA as it is the bank's primary market and largest AA by loan volume and completed a limited scope review of the remaining AAs. A community profile for each AA is provided in the "Description of Institution's Operations in Ohio" in the State of Ohio section of this performance evaluation.

Ratings

The bank's overall rating is based on the State of Ohio rating.

CNB operates in the State of Ohio, with all branches in Ohio. The State of Ohio rating is based on the performance of all AAs, the Canton-Massillon, Akron, Weirton-Steubenville, Youngstown-Warren, and the Ohio non-MSA AA. The OCC placed the most weight on the full-scope review of the Canton-Massillon MSA AA, as 53.8 percent of home mortgage lending activity was inside this AA during the evaluation period. Additionally, approximately 41.2 percent of the bank's total deposits were in the Canton-Massillon MSA AA as of December 31, 2024, FDIC Deposit Market Share Report. A majority of the bank's total lending and deposit activity occurs in the Canton-Massillon MSA AA. Refer to the "Scope" section under the state 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 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 Ohio¹: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- The bank's distribution of home mortgage loans reflects a reasonable distribution of loans to individuals of different geographies.
- The bank's distribution of home mortgage loans reflects a reasonable distribution of loans to individuals of different income levels.
- The LTD ratio is reasonable.
- The in-out ratio is reasonable, with most of the bank's loans originated within its defined AA.
- Performance within the limited-scope AAs, specifically the Akron MSA AA and Ohio non-MSA AA was stronger than the performance within the primary AA.
- The bank's community development loans, investments, donations, and services demonstrate outstanding performance within the AAs.

Description of Institution's Operations in Ohio

CNB has 22 branches located within eastern Ohio. CNB has six AAs located in eastern Ohio that consist of Stark, Carroll, Summit, Jefferson, Mahoning, Columbiana, and Harrison Counties. The CTs within each AA are contiguous, meet the requirements of the CRA, and do not arbitrarily exclude any LMI areas. The AAs have no designated distressed or underserved CTs. Bank management selected the AAs based on its targeted lending territory, the area with the most deposit and lending activity, and with 10 office locations in the AA.

¹ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

Canton-Massillon MSA

Assessment Area(s) - Canton-Massillon MSA 2022						
2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	97	8.25	17.53	50.52	23.71	0.00
Population by Geography	401,574	6.24	13.69	52.96	27.11	0.00
Housing Units by Geography	180,622	6.70	15.12	53.70	24.49	0.00
Owner-Occupied Housing by Geography	113,969	3.21	10.27	56.59	29.92	0.00
Occupied Rental Units by Geography	51,639	12.49	23.59	47.43	16.49	0.00
Vacant Units by Geography	15,014	13.23	22.76	53.27	10.74	0.00
Businesses by Geography	13,452	5.14	13.88	56.17	24.81	0.00
Farms by Geography	644	1.71	5.28	63.82	29.19	0.00
Family Distribution by Income Level	105,697	19.61	18.76	21.54	40.09	0.00
Household Distribution by Income Level	165,608	23.53	16.40	18.44	41.63	0.00
Unemployment rate (%)	5.05	16.70	8.91	3.72	3.72	0.00
Households Below Poverty Level (%)	12.75	43.43	23.05	9.90	5.66	0.00
Median Family Income (15940 - Canton-Massillon, OH MSA)		\$70,028			Median Housing Value	\$127,800
Median Family Income (15940 - Canton-Massillon, OH MSA) for 2022		\$76,900			Median Gross Rent	\$745
					Families Below Poverty Level	9.58

FFIEC File - 2020 Census
 2022 Dun & Bradstreet SBSF Demographics
 Due to rounding, totals may not equal 100.0%
 (*) The NA category consists of geographies that have not been assigned an income classification

Assessment Area(s) - Canton-Massillon MSA AA						
2023-2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	97	8.25	17.53	50.52	23.71	0.00
Population by Geography	401,574	6.24	13.69	52.96	27.11	0.00
Housing Units by Geography	180,622	6.70	15.12	53.70	24.49	0.00
Owner-Occupied Housing by Geography	113,969	3.21	10.27	56.59	29.92	0.00
Occupied Rental Units by Geography	51,639	12.49	23.59	47.43	16.49	0.00
Vacant Units by Geography	15,014	13.23	22.76	53.27	10.74	0.00
Businesses by Geography	18,232	4.26	11.11	43.33	41.31	0.00
Farms by Geography	876	2.17	4.91	54.45	38.47	0.00
Family Distribution by Income Level	105,697	19.61	18.76	21.54	40.09	0.00
Household Distribution by Income Level	165,608	23.53	16.40	18.44	41.63	0.00
Unemployment rate (%)	5.05	16.70	8.91	3.72	3.72	0.00
Households Below Poverty Level (%)	12.75	43.43	23.05	9.90	5.66	0.00
Median Family Income (15940 - Canton-Massillon, OH MSA)		\$70,028			Median Housing Value	\$127,800
Median Family Income (15940 - Canton-Massillon, OH MSA) for 2024		\$85,500			Median Gross Rent	\$745
					Families Below Poverty Level	9.58

FFIEC File - 2020 Census
 FFIEC File - 2024 Census
 2024 Dun & Bradstreet SBSF Demographics
 Due to rounding, totals may not equal 100.0%

The Canton-Massillon MSA AA, based on 2020 and 2024 U.S. Census data, consists of 97 individual CTs, and increase of four CTs since the prior CRA examination. As of 2024 data, the AA is comprised of eight low-income CTs and 16 moderate-income CTs. All LMI tracts were in Stark County and concentrated in the cities of Canton, Massillon, and Alliance, Ohio. The number of low-income CTs increased by one over the evaluation period and the number of moderate-income CTs increased by two

over the evaluation period. As of 2024, the AA has 34 middle-income and 19 upper-income CTs. CNB’s headquarters is in Minerva, Ohio. 11 of the bank’s 22 branches are in the Canton-Massillon MSA AA.

According to the 2024 U.S. Census data, 6.2 percent of the AA was population living in low-income CTs and 13.7 percent of the population in moderate-income CTs. The AA continues to experience a small decline in population, with a 0.44 percent decline from the 2015 U.S. Census data. Low-income families represent 19.6 percent, and moderate-income families represent 18.8 percent of total families in the AA. Approximately 9.58 percent of the families live below the poverty level. The median housing value in the AA was \$127,800. Based on the median family income in the AA of \$85,500, low-income families make less than \$42,750 (individual income that is less than 50 percent of the area median family income) and moderate-income families make at least \$42,750 but less than \$68,400 (individual income that is at least 50 percent and less than 80 percent of the area median family income). As of the 2024 U.S. Census, there are 180,622 total housing units in the AA, of which 63.1 percent are owner-occupied, 28.6 percent are rental occupied units, and 8.3 percent are vacant housing units.

Competition in the AA is strong due to the presence of many regional and community banks. Competitors with a significant deposit market share include Huntington National Bank, JP Morgan Chase Bank NA, Key Bank NA, First Commonwealth Bank, and Citizens Bank, NA. As of the June 30, 2024, FDIC’s Deposit Market Share Report, there were 18 financial institutions operating 96 banking offices in the Canton-Massillon MSA, including CNB. The market share data shows the bank ranks sixth in overall deposit market share at 5.5 percent. Approximately 57.7 percent of the bank’s total deposits are in the Canton-Massillon MSA AA.

Based on 2024 peer aggregate home mortgage lending data, CNB was ranked 27 of 298 with an 0.71 percent market share in the AA. The top five lenders have a market share of 38.0 percent.

The five largest lenders include Huntington National Bank, Crosscountry Mortgage, LLC, Rocket Mortgage, CBNA Year to Date, and First Commonwealth Bank.

The AA is a mix of rural and urban areas. The largest cities in the AA are Canton, Massillon, and Alliance, all of which are in Stark County. The economy is driven largely by manufacturing, retail, health care and social assistance. Major employers include Aultman Hospital, The Timken Company, and Mercy Medical Center.

The economic conditions in the AA were overall stable during the evaluation period. The unemployment rate for Stark and Carroll Counties have remained slightly elevated compared to the State of Ohio average during the evaluations period, with Stark County experiencing lower unemployment of the two counties within the AA.

Average Annual Unemployment Rates			
	2022	2023	2024
Stark County	4.1	3.9	4.1
Carroll County	4.5	4.2	4.8
State of Ohio	4.0	3.7	4.3

The OCC reached out to an organization that focuses on meeting the housing needs of LMI individuals and families in Stark County Ohio. The organization identified three main areas of concern within the AA which included financial literacy for youth and adults, affordable house, and food deserts. The contact noted that financial illiteracy amongst the adult and elderly population was a significant barrier to access the banking system amongst these populations. The bank is helping to meet the identified needs of their community. The bank invested \$10.3 million into a limited partnership focused on developing affordable housing within the bank's AAs in 2023. Additionally, President Lober serves on the Executive Steering Committee for the Strengthening Stark's Housing Advisory Team which is focused on developing affordable housing opportunities within Stark County.

Scope of Evaluation in Ohio

Examiners performed a full-scope evaluation for the Canton-Massillon AA. Limited-scope reviews were completed on the other AAs. Home mortgage lending is the bank's primary lending product and was evaluated under the Lending Test. Examiners used HMDA data from 2022, 2023, and 2024 for the home mortgage lending analysis. Refer to the "Scope of the Evaluation" section for more details.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's lending performance in the state of Ohio was reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibited reasonable geographic distribution of loans in the state.

Home Mortgage Loans

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

CNB's distribution of home mortgage loans among CTs of different income levels in the Canton-Massillon MSA AA during the evaluation period is reasonable. In 2022, the percentage of home mortgage loans originated or purchased by the bank in low-income CTs exceeded both the percentage of owner-occupied housing units and aggregate performance, but lending in moderate-income CTs was significantly lower than the percentage of owner-occupied housing units and the aggregate lending percentage. In 2023 to 2024, bank lending to both low and moderate-income CTs was below both the percentage of owner-occupied housing units and aggregate lending percentages in those CTs. However, more weight was given to 2022 data given the higher volume of lending that year due to a lower rate environment, originating 95 loans in the AA compared to 120 loans in 2023 and 2024 combined.

Lending Gap Analysis

Overall, examiners 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 exhibited a reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank within the primary AA.

Home Mortgage Loans

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

CNB's distribution of home mortgage loans to borrowers of different income levels during the 2022 evaluation period and 2023 through 2024 evaluation period is reasonable. In 2022, the bank's distribution of home mortgage lending to low-income borrowers was below percentage of low-income families in the AA, but consistent with aggregate lending percentages. The bank's distribution of home mortgage lending to moderate-income borrowers exceeded the percentage of moderate-income families in the AA and was consistent with near-to both the peer and aggregate numbers. In 2023 through 2024, bank lending to low-income borrowers was significantly below both the percentage of low-income families in the AA and aggregate lending data. Bank lending to moderate-income borrowers was slightly below the percentage of moderate-income families in the AA, and significantly below aggregate lending data. However, more weight was given to 2022 data given the higher volume of lending that year due to a lower rate environment, originating 95 loans in the AA compared to 120 loans in 2023 and 2024 combined.

Responses to Complaints

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

Conclusions for Areas Receiving Limited Scope Reviews

Based on limited-scope reviews, the bank's performance in the evaluation period under the Lending Test in the Akron MSA, Weirton-Steubenville MSA, Youngstown-Warren MSA, and Ohio non-MSA AAs was stronger than the bank's overall performance under the Lending Test in the full scope areas. The performance in the Akron MSA AA exceeded the bank's performance in their primary AA. Performance in lending to low-income CTs exceeded the aggregate level in both 2022 and 2023 to 2024. Lending to moderate-income CTs significantly exceeded the aggregate lending performance for both review periods. Additionally, the bank exceeded the lending to low-income borrowers in both demographic and aggregate data. In the Ohio non-MSA AA, the bank's lending to moderate-income CTs exceeded demographic and aggregate peer data throughout the review period. While lending to low-income CTs was limited in the 2022 evaluation period, lending to low-income borrowers as consistent with demographic and aggregate information.

COMMUNITY DEVELOPMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Community Development Loans

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

Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Canton-Massillon MSA	10	45.4	\$ 11,968	36.7
Akron MSA	2	9.1	\$ 3,450	10.6
Weirton-Steubenville MSA	0	0.0	\$ -	0.0
Youngstown-Warren MSA	0	0.0	\$ -	0.0
Ohio non-MSA	3	13.6	\$ 1,000	3.1
Broader State and Regional Area	7	31.8	\$ 16,194	49.7
Total	22	100%	\$ 32,612	100%

During the evaluation period, CNB demonstrated excellent responsiveness to the CD needs of its AA and broader state and regional area. The bank originated a total of 22 loans totaling \$32.6 million in the evaluation period that qualify as CD loans, representing 35.2 percent of Tier One Capital as of December 31, 2024. Within the Canton-Massillon MSA AA the bank originated 10 loans for \$12.0 million. These loans were primarily comprised of SBA 504 loans and loans directly targeted to help LMI members of the community.

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

- The bank provided \$6.7 million in SBA 504 financing to Castle Aviation (Akron Canton Airport).
- The bank provided \$14.4 million in financing through five loans to Horizon Education Centers. These facilities provide education and after school services to LMI families. 59.2 percent of students at these centers are below the 130 percent of the federal poverty level to qualify for free lunch, and an additional 12.6 percent are between 130 percent and 185 percent of the federal poverty level and qualify under the reduced lunch program.

- The bank provided \$3.5 million in financing through two loans to New Destiny Treatment Centers. These facilities are focused on providing drug and alcohol rehabilitation and treatment to people within the Canton-Massillon MSA, and 90 percent of the facility's patients qualify for Medicaid.

Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Akron MSA 2024	0	0	1	1,378	1	10.0	1,378	18.9	0	0
Canton-Massillon MSA 2024	3	1,145	5	4,285	8	80.0	5,430	74.4	1	6,800
Ohio Non-MSA 2024	0	0	0	0	0	0.0	0	0.0	0	0
Weirton-Steubenville MSA 2024	0	0	0	0	0	0.0	0	0.0	0	0
Youngstown-Warren MSA 2024	1	495	0	0	1	10.0	495	6.8	0	0
Total	4	1,640	6	5,663	10	100.0	7,303	100.0	1	6,800

The Qualified Investment Table, shown above, set forth the information and data used to evaluate the bank's level of qualified investments. These tables include all qualified investment, including prior period investments that remain outstanding as of the end of evaluation period.

During the evaluation period, CNB made a satisfactory level of CD investments which had a neutral impact on its overall lending performance in the AA. The bank made six qualified investments totaling approximately \$5.7 million, and an additional \$1.6 million in prior period investments. The bank also made an approximately \$15,000 in donations within the bank's AA. The following are examples of qualified investments in the AA:

- The bank purchased two custom mortgage-backed security pools consisting of nine mortgages to LMI borrowers or mortgages secured by collateral in LMI areas of Summit County.
- The bank invested \$10.25 million in a limited partnership that facilitates the development of affordable housing. As of December 31, 2024, the bank has funded \$3.4 million and has \$6.8 million in future funding commitments.

Community Development Services

CNB provides a significant level of CD services. Nine employees and/or directors provided financial expertise to 15 different CD organizations across the bank's AA. Bank employees provided approximately 1,530 service hours to these organizations which included affordable housing, community services, economic development, and revitalization/stabilization. Bank employees primarily served in board and leadership positions. Examples of CD services include:

- Two employees served on committees and on as a board member of an economic development organization that helps provide financing options through the SBA 504 program.
- A bank employee serves on a financial board of a local nonprofit that focuses on revitalizing and rehabilitating LMI areas through economic development.

Conclusions for Areas Receiving Limited Scope Reviews

Based on limited-scope reviews, the bank's performance under the CD Test in the Akron MSA AA, Youngstown-Warren MSA AA, Weirton-Steubenville MSA AA, and Ohio non-MSA AA was consistent with the bank's overall performance under the CD Test in the full scope area(s).

Appendix A: Scope of Examination

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

Time Period Reviewed:	January 1, 2022, to December 31, 2024	
Bank Products Reviewed:	Home mortgage Community development loans, qualified investments, community development services	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Ohio		
Canton-Massillon MSA AA	Full-scope	Stark and Carroll Counties
Akron MSA AA	Limited-scope	Summit County
Ohio non-MSA AA	Limited-scope	Columbiana County and Harrison County CTs 9759 and 6760
Weirton-Steubenville MSA 2024	Limited-scope	Jefferson County
Youngstown-Warren MSA 2024	Limited-scope	Mahoning County CTs 8130, 8132, 8133, 8134, 8135.02, and 8136.02
Wheeling MSA AA	Limited-scope	CTs 0101, 0103, 0119, and 0120

Appendix B: Summary of State Ratings

RATINGS			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/ Rating
Consumers National Bank	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 the 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 non-metropolitan 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 low- and moderate-income 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): 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/assessment area.

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

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

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

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

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

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

Multistate Metropolitan Statistical Area (MMSA): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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

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

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

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

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

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original

amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

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

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

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

Appendix D: Tables of Performance Data

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 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.

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
Akron MSA 2022	21	3,609	14.69	18,384	6.65	9.52	5.94	18.11	33.33	17.12	36.90	23.81	37.31	38.15	33.33	38.83	0.19	--	0.36
Canton-Massillon MSA 2022	95	20,617	66.43	13,048	3.21	4.21	2.52	10.27	5.26	10.46	56.59	70.53	55.62	29.92	20.00	31.14	--	--	--
Ohio Non-MSA 2022	18	1,594	12.59	2,882	2.06	--	1.53	6.23	11.11	6.70	81.40	83.33	83.73	10.31	5.56	7.98	--	--	--
Weirton-Steubenville MSA 2022	8	879	5.59	1,457	0.64	--	0.41	6.20	--	4.80	86.60	75.00	83.32	6.55	25.00	11.19	--	--	--
Wheeling MSA 2022	1	304	0.70	1,362	--	--	--	8.74	--	21.44	91.26	100.00	52.72	--	--	25.48	--	--	--
Total	143	27,004	100.00	37,133	4.52	4.20	3.96	13.28	9.79	13.65	52.09	65.73	49.72	30.02	20.28	32.16	0.09	--	0.18

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2023-2024		
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		
Akron MSA 2024	23	5,401	10.31	13,412	6.65	8.70	7.25	18.11	47.83	20.35	36.90	21.74	36.69	38.15	21.74	35.39	0.19	--	0.30		
Canton-Massillon MSA 2024	120	32,118	53.81	9,338	3.21	1.67	3.15	10.27	4.17	10.31	56.59	65.83	54.82	29.92	28.33	31.70	--	--	--		
Ohio Non-MSA 2024	47	5,591	21.08	2,090	1.60	4.26	2.01	6.70	4.26	7.89	78.52	80.85	81.05	13.18	10.64	9.04	--	--	--		
Wheeling MSA 2024	0	0	0.00	1,161	--	--	--	8.74	--	20.93	91.26	--	56.24	--	--	22.39	--	--	--		
Weirton-Steubenville MSA 2024	29	3,701	13.00	1,160	0.64	--	0.34	6.20	3.45	5.17	86.60	89.66	86.12	6.55	6.90	8.28	--	--	--		
Youngstown-Warren MSA 2024	4	730	1.79	5,097	--	--	2.63	--	--	16.34	59.82	100.00	39.98	40.18	--	40.46	--	--	0.55		
Total	223	47,541	100.00	32,258	4.37	2.69	4.49	13.04	8.52	15.48	51.97	68.16	47.81	30.52	20.63	31.97	0.09	--	0.21		

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

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Akron MSA 2022	21	3,609	14.69	18,384	21.44	28.57	10.24	17.27	19.05	21.67	21.20	9.52	20.91	40.09	33.33	33.12	--	9.52	14.06
Canton-Massillon MSA 2022	95	20,617	66.43	13,048	19.61	9.47	10.19	18.76	23.16	23.02	21.54	24.21	22.52	40.09	37.89	30.58	--	5.26	13.69
Ohio Non-MSA 2022	18	1,594	12.59	2,882	21.56	22.22	12.87	18.27	5.56	25.78	22.05	44.44	22.66	38.12	27.78	28.31	--	--	10.37
Weirton-Steubenville MSA 2022	8	879	5.59	1,457	21.57	--	8.85	17.41	12.50	23.13	22.30	25.00	23.88	38.72	25.00	27.11	--	37.50	17.02
Wheeling MSA 2022	1	304	0.70	1,362	17.86	--	11.09	17.99	--	23.27	26.87	--	21.00	37.28	100.00	27.24	--	--	17.40
Total	143	27,004	100.00	37,133	20.75	13.29	10.40	17.92	19.58	22.58	21.54	24.48	21.74	39.78	35.66	31.40	--	6.99	13.88

Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2024 Bank Data, 2023, -- HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Akron MSA 2024	23	5,401	10.31	13,412	21.44	21.74	13.96	17.27	26.09	23.64	21.20	17.39	21.06	40.09	30.43	26.63	--	4.35	14.72
Canton-Massillon MSA 2024	120	32,118	53.81	9,338	19.61	4.17	9.98	18.76	17.50	24.77	21.54	15.00	22.74	40.09	50.83	29.57	--	12.50	12.95
Ohio Non-MSA 2024	47	5,591	21.08	2,090	21.31	12.77	13.11	18.18	27.66	26.60	21.89	23.40	22.87	38.63	31.91	26.17	--	4.26	11.24
Weirton-Steubenville MSA 2024	29	3,701	13.00	1,160	21.57	6.90	9.83	17.41	6.90	23.79	22.30	24.14	21.98	38.72	48.28	27.84	--	13.79	16.55
Youngstown-Warren MSA 2024	4	730	1.79	5,097	15.76	--	10.61	16.56	25.00	23.09	22.03	--	22.44	45.65	75.00	30.98	--	--	12.87
Wheeling MSA 2024	0	0	0.00	1,161	17.86	--	12.75	17.99	--	22.57	26.87	--	21.88	37.28	--	24.81	--	--	18.00
Total	223	47,541	100.00	32,258	20.63	8.07	12.03	17.89	19.28	24.04	21.54	17.94	21.94	39.95	44.84	28.11	--	9.87	13.87

Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2024 Bank Data, 2023, -- HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%