



## **PUBLIC DISCLOSURE**

July 8, 2024

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

The First National Bank of Oneida  
Charter Number 8039

603 North Main Street  
Oneida, TN 37841

Office of the Comptroller of the Currency

320 Seven Springs Way  
Suite 310  
Brentwood, TN 37027

**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 is based on The First National Bank of Oneida's (FNB, bank) reasonable loan-to-deposit (LTD) ratio, substantial majority of lending occurring inside the assessment areas (AAs), and a reasonable distribution of loans to borrowers of different income levels and businesses of different sizes.
- The bank did not receive any Community Reinvestment Act (CRA) complaints during the review period.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio is reasonable. The bank's quarterly average LTD ratio for the twelve consecutive quarters between January 1, 2021, and December 31, 2023, was 59.3 percent, with a quarterly high ratio of 66.7 percent and a quarterly low ratio of 52.3 percent. We compared the bank's LTD ratio to five other banks located within the region. The quarterly average LTD ratio for banks in this peer group was 67.2 percent for the same period, ranging from 51.7 percent to 80.8 percent.

### Lending in Assessment Area

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

The bank originated and purchased 73.6 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	317	72.5	120	27.5	437	39,307	54.0	33,548	46.0	72,855
Small Business	93	77.5	27	22.5	120	6,290	51.5	5,913	48.5	12,203
Total	410	73.6	147	26.4	557	45,597	53.6	39,461	46.4	85,058

*Source: 01/01/2021-12/31/2023 Bank Data;  
Due to rounding, totals may not equal 100.0%.*

### Description of Institution

The First National Bank of Oneida is a nationally chartered bank, established in 1904, and headquartered in Oneida, Tennessee. The bank is a single-state institution and has no holding company

or affiliates. In 2023, FNB became a Community Development Financial Institution (CDFI). The bank has four offices in Tennessee, with three in Scott County, in the cities of Oneida, Helenwood, and Winfield, and one office in Campbell County, in the city of LaFollette. Each location includes an automated teller machine (ATM). The Scott County branch ATMs are additionally capable of accepting deposits. All branches have standard hours of operation, with the Oneida branch also open for limited hours on Saturdays. FNB offers traditional deposit products such as checking and savings accounts to its customers, as well as standard loan products like mortgages, home equity lines of credit, and consumer and commercial loans. In addition to these products, the bank offers online banking, online bill-pay, and mobile deposit services. FNB relocated the Oneida main office a short distance from the prior location in 2022, but has not otherwise opened or closed any offices during this evaluation period. There have not been any major changes in the bank's operational structure since the July 20, 2021, CRA examination, when the bank received a Satisfactory rating. We found no legal or financial impediments adversely affecting the bank's ability to help meet community credit needs.

As of December 31, 2023, the bank reported total assets of \$312.3 million, deposits of \$283.1 million, and net loans of \$188.9 million. Net loans represented 60.5 percent of total assets. The bank's leverage ratio was 10.9 percent. The bank's primary loan products are home mortgage loans and business loans, which make up 44.9% and 24.9%, respectively, of FNB's lending activity.

The bank has two AAs, consisting of Scott and Campbell Counties. Each AA meets regulatory requirements and consist of complete political subdivisions that do not arbitrarily exclude low- or moderate-income (LMI) geographies. In 2023, the two combined AAs consist of nineteen census tracts (CTs) with an approximate population of 61 thousand. Of the nineteen CTs, thirteen are moderate-income and three are middle-income CTs. There are no lower- or upper-income CTs in either AA.

## **Scope of the Evaluation**

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

The evaluation period for this examination is January 1, 2021 through December 31, 2023. We completed a review of the bank's CRA performance in its AAs using the Small Bank CRA procedures, which include a Lending Test. In evaluating the bank's lending performance, we reviewed home mortgage loans subject to filing under the Home Mortgage Disclosure Act (HMDA) and loans to small businesses, the bank's primary lending products. Lending performance for business loans is based on a sample of loans originated or purchased, rather than the full population of data, and is considered in context. We targeted a sample of 20 small business loans per year in each AA, and relied on the entire population when that quantity was not available. For example, we used the full population of qualified business loans for 2022 and 2023 in the Campbell County MSA AA. We did not review consumer loans or small farm loans as these loan types do not represent major product lines and would not materially affect any conclusions or ratings.

### **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 assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under the State of Tennessee 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 based on its performance in the state of Tennessee. We placed equal weight on performance in each AA and placed more weight on the bank's home mortgage lending performance, as it made up the greater portion of the bank's lending activity.

The state ratings are based on performance in all bank AAs. Refer to the "Scope" section under the State of Tennessee 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) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, 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 Tennessee

**CRA rating for the State of Tennessee<sup>1</sup>:** Satisfactory

**The Lending Test is rated:** Satisfactory

The major factors that support this rating include:

- The bank's LTD ratio is reasonable.
- A substantial majority of the bank's lending activity is within its assessment areas (AAs)
- The distribution of loans to borrowers of different income levels and businesses of different sizes is reasonable.
- The bank did not receive any CRA-related complaints during the review period.

### Description of Institution's Operations in Tennessee

The bank's headquarters in Oneida, along with branches in Helenwood and Winfield, are located in Scott County, a non-Metropolitan Statistical Area (MSA). For our review period, this AA includes only moderate- and middle-income census tracts (CTs). As of June 30, 2023, FNB held a 64.3 percent market share of total deposits inside the Scott County, TN market, although the bank faces significant loan competition from mortgage companies and large bank small business lenders. Top employers within Scott County include the Scott County Board of Education (education), Great Dane Industries (trucking equipment manufacturer), JDS Technologies (rubber products manufacturer), Walmart (retailer), and the Oneida Special School District (education).

A community contact from an organization serving Scott County mentioned the need for affordable housing, including rental properties. Existing housing inventories often require costly rehabilitation and repairs, and poverty is a concern among county residents. While not considered as part of the Lending Test, the bank notably addressed Scott County AA needs by originating an \$8.1 million loan in 2021 to support the development of LMI apartment housing in Scott County.

The bank maintains an additional office in LaFollette, which is located in Campbell County. Adjacent to Scott County, Campbell County is a part of the larger Knoxville, TN MSA; however, the bank has designated only Campbell County as an AA. For our review period, this AA includes only moderate- and middle-income CTs. As of June 30, 2023, FNB held a 3.7 percent market share of total deposits inside the Campbell County, TN market. The bank faces significant competition in this AA from community and regional banks. Top employers within Campbell County include Deroyal Industries (healthcare products manufacturer), Campbell County Board of Education (education), Dixie Roofing Inc. (roofing contractor), Matix Corporation (automobile parts manufacturer), and Walmart (retailer).

A community contact from an organization serving Campbell County discussed staffing shortages for businesses and the need for affordable housing for low-income individuals and families.

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

The following tables provide a summary of the demographics that include housing and business information for the AAs.

### Scott County Non-MSA AA

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Scott County Non-MSA 2021</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	5	0.0	40.0	60.0	0.0	0.0
Population by Geography	22,043	0.0	47.6	52.4	0.0	0.0
Housing Units by Geography	9,872	0.0	44.1	55.9	0.0	0.0
Owner-Occupied Units by Geography	6,064	0.0	45.6	54.4	0.0	0.0
Occupied Rental Units by Geography	2,245	0.0	41.0	59.0	0.0	0.0
Vacant Units by Geography	1,563	0.0	42.9	57.1	0.0	0.0
Businesses by Geography	1,154	0.0	43.0	57.0	0.0	0.0
Farms by Geography	22	0.0	31.8	68.2	0.0	0.0
Family Distribution by Income Level	5,620	29.0	20.1	19.9	30.9	0.0
Household Distribution by Income Level	8,309	32.5	16.7	18.3	32.5	0.0
Median Family Income Non-MSAs - TN		\$46,066	Median Housing Value			\$85,016
			Median Gross Rent			\$525
			Families Below Poverty Level			22.0%
<i>Source: 2015 ACS and 2021 D&amp;B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Scott County Non-MSA 2022-2023</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	6	0.0	50.0	50.0	0.0	0.0
Population by Geography	21,850	0.0	57.5	42.5	0.0	0.0
Housing Units by Geography	10,035	0.0	55.6	44.4	0.0	0.0
Owner-Occupied Units by Geography	6,151	0.0	51.7	48.3	0.0	0.0
Occupied Rental Units by Geography	2,473	0.0	65.0	35.0	0.0	0.0
Vacant Units by Geography	1,410	0.0	55.7	44.3	0.0	0.0
Businesses by Geography	1,319	0.0	69.1	30.9	0.0	0.0
Farms by Geography	35	0.0	54.3	45.7	0.0	0.0
Family Distribution by Income Level	5,902	26.2	25.9	18.1	29.8	0.0
Household Distribution by Income Level	8,625	29.9	18.2	17.6	34.3	0.0
Median Family Income Non-MSA - TN		\$56,418	Median Housing Value			\$95,296
			Median Gross Rent			\$564

	Families Below Poverty Level	17.7%
<i>Source: 2020 U.S.S Census and 2023 D&amp;B Data                  Due to rounding, totals may not equal 100.0                  (*) The NA category consists of geographies that have not been assigned an income classification.</i>		

**Campbell County MSA AA**

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Campbell County MSA 2021</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	11	0.0	90.9	9.1	0.0	0.0
Population by Geography	40,176	0.0	94.5	5.5	0.0	0.0
Housing Units by Geography	20,256	0.0	93.5	6.5	0.0	0.0
Owner-Occupied Units by Geography	11,185	0.0	92.7	7.3	0.0	0.0
Occupied Rental Units by Geography	4,810	0.0	98.7	1.3	0.0	0.0
Vacant Units by Geography	4,261	0.0	89.6	10.4	0.0	0.0
Businesses by Geography	2,003	0.0	95.7	4.3	0.0	0.0
Farms by Geography	43	0.0	86.0	14.0	0.0	0.0
Family Distribution by Income Level	10,924	34.8	23.2	18.2	23.7	0.0
Household Distribution by Income Level	15,995	37.1	19.2	16.5	27.2	0.0
Median Family Income MSA - 28940 Knoxville, TN MSA		\$59,829	Median Housing Value			\$89,663
			Median Gross Rent			\$519
			Families Below Poverty Level			18.3%
<i>Source: 2015 ACS and 2021 D&amp;B Data                  Due to rounding, totals may not equal 100.0%                  (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Campbell County MSA 2022-2023</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	13	0.0	76.9	23.1	0.0	0.0
Population by Geography	39,272	0.0	74.5	25.5	0.0	0.0
Housing Units by Geography	21,207	0.0	73.4	26.6	0.0	0.0
Owner-Occupied Units by Geography	10,934	0.0	74.0	26.0	0.0	0.0
Occupied Rental Units by Geography	5,527	0.0	75.5	24.5	0.0	0.0
Vacant Units by Geography	4,746	0.0	69.3	30.7	0.0	0.0
Businesses by Geography	2,618	0.0	68.9	31.1	0.0	0.0
Farms by Geography	71	0.0	71.8	28.2	0.0	0.0
Family Distribution by Income Level	11,035	32.8	22.8	19.7	24.7	0.0
Household Distribution by Income Level	16,461	35.0	18.2	17.2	29.7	0.0



Median Family Income MSA – 28940 Knoxville, TN MSA	\$72,608	Median Housing Value	\$117,415
		Median Gross Rent	\$590
		Families Below Poverty Level	15.5%
<i>Source: 2020 U.S.S Census and 2023 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>			

## Scope of Evaluation in Tennessee

Both of the bank’s AAs received full-scope reviews of its lending performance for its two primary loan products. We placed equal weight on the bank’s performance in each AA, but placed more weight on the bank’s home mortgage lending performance, as it made up the greater portion of the bank’s lending activity.

## LENDING TEST

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

## Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Scott County Non-MSA AA and the Campbell County MSA AA is good.

## Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the State.

### *Home Mortgage Loans*

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

#### Scott County Non-MSA AA

The distribution of home mortgage loans to geographies of different income levels in this AA is reasonable. In 2021, the percentage of the bank’s loans in moderate-income CTs was in-line with peer aggregate lending levels and slightly below the percentage of owner-occupied housing units. In 2022-2023, the bank’s percentage of loans in the moderate-income CTs exceeded the peer aggregate lending levels and the percentage of owner-occupied housing units. There were no low-income CTs in this AA.

#### Campbell County MSA AA

The distribution of home mortgage loans to geographies of different income levels in this AA is reasonable. In 2021, the bank originated all loans in moderate-income CTs, which exceeded peer aggregate lending levels and the percentage of owner-occupied housing units. In 2022-2023, the bank’s percentage of loans in the moderate-income CTs was in-line with the peer aggregate lending level and below the overall percentage of owner-occupied housing units. There were no low-income CTs in this AA.

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

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

#### Scott County Non-MSA AA

The distribution of small loans to businesses in geographies of different income levels in this AA is poor. In 2021, the percentage of the bank's loans in moderate-income CTs were in-line with peer aggregate lending levels and the percentage of businesses. In 2022-2023, the bank's percentage of loans was significantly lower than the peer aggregate lending level and the overall percentage of small businesses. There were no low-income CTs in this AA.

#### Campbell County MSA AA

The distribution of small loans to businesses in geographies of different income levels in this AA is reasonable. In 2021, the percentage of the bank's loans in moderate-income CTs was in-line with peer aggregate lending levels and slightly below the percentage of small businesses. In 2022-2023, the bank's percentage of loans in the moderate-income CTs was in-line with the peer aggregate lending level and the overall percentage of small businesses. There were no low-income CTs in this AA.

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

We did not identify any unexplained conspicuous gaps during our review.

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

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

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

Refer to Table P in the State of Tennessee 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.

#### Scott County Non-MSA AA

The distribution of home mortgage loans to individuals of different income levels in this AA is reasonable. In 2021, the bank's lending to low-income borrowers, exceeded the peer aggregate lending level but was below the percentage of low-income families. The bank's lending to moderate-income borrowers was below peer aggregate lending levels and the percentage of moderate-income families. In 2022-2023, the bank's lending to low-income borrowers was higher than peer aggregate lending levels, but lower than the percentage of low-income families. The bank's lending to moderate-income borrowers was below peer aggregate lending levels and the percentage of moderate-income borrowers. The bank's lending performance in the AA is considered reasonable given the strength of lending to low-income borrowers and the significant competition the bank faces from non-bank entities, including mortgage companies.

#### Campbell County MSA AA

The distribution of home mortgage loans to individuals of different income levels in this AA is reasonable. In 2021, the bank's lending to low-income borrowers significantly exceeded the peer aggregate lending level and slightly exceeded the percentage of low-income families. The bank's

lending to moderate-income borrowers was in-line with peer aggregate lending levels and below the percentage of moderate-income families. In 2022-2023, the bank's lending to low-income borrowers was in-line with the peer aggregate lending level and significantly below the percentage of low-income families. The bank's lending to moderate-income borrowers was slightly below the peer aggregate lending levels and below the percentage of moderate-income borrowers. The bank's lending performance in this AA is considered reasonable given the strength of lending to low-income borrowers and the significant competition from other financial institutions, resulting in the bank's small market share.

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

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

#### **Scott County Non-MSA AA**

The distribution of small loans to businesses of different sizes is reasonable. In 2021, the bank's percentage of small loans to businesses with gross revenues equal to or less than \$1 million was below peer aggregate lending levels and the percentage of businesses. A majority of the loans in our sample for this year were originated under the Paycheck Protection Program (PPP), which was created in response to the Covid-19 pandemic and did not require borrower income verification. Accordingly, 75 percent of loans in our sample did not have revenue information available. Because of the number of small business loans without revenue data in 2021, we placed more weight on performance in 2022-2023. In 2022-2023, the bank's percentage of small loans to businesses with gross revenues equal to or less than \$1 million significantly exceeded the peer aggregate lending level and was in-line with the percentage of businesses.

#### **Campbell County MSA AA**

The distribution of small loans to businesses of different sizes is reasonable. In 2021, the bank's percentage of small loans to businesses with gross revenues equal to or less than \$1 million significantly exceeded aggregate peer lending levels but was below the percentage of businesses. In 2022-2023, the bank's percentage of small loans to businesses with gross revenues equal to or less than \$1 million significantly exceeded aggregate peer lending levels and was slightly below the percentage of businesses.

### **Responses to Complaints**

FNB received no CRA-related complaints during the evaluation period.

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed:</b>	01/01/2021 to 12/31/2023	
<b>Bank Products Reviewed:</b>	Home mortgage, small business	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None	N/A	N/A
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>State (Tennessee)</b>		
Scott County Non-MSA AA	Full-Scope	Entirety of Scott County
Campbell County MSA AA	Full-Scope	Entirety of Campbell County

## Appendix B: Summary of MMSA and State Ratings

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RATINGS	First National Bank of Oneida
Overall Bank:	Lending Test Rating
The First National Bank of Oneida	Satisfactory
MMSA or State:	
Tennessee	Satisfactory

## Appendix C: Definitions and Common Abbreviations

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

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

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

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

**Combined Statistical Area (CSA):** A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

**Community Development (CD):** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

**Community Reinvestment Act (CRA):** The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

**Consumer Loan(s):** A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

**Full-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

**Geography:** A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

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

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

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

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

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

**Metropolitan Division:** 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.

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

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

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

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

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



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

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

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

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

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	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
Campbell County MSA	14	1,054	14.4	1,713	0.0	0.0	0.0	92.7	100.0	92.6	7.3	0.0	7.4	0.0	0.0	0.0	0.0	0.0	0.0
Scott County Non-MSA	83	9,311	85.6	337	0.0	0.0	0.0	45.6	41.0	41.5	54.4	59.0	58.5	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>97</b>	<b>10,365</b>	<b>100.0</b>	<b>2,050</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>76.1</b>	<b>49.5</b>	<b>84.2</b>	<b>23.9</b>	<b>50.5</b>	<b>15.8</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>
<p>Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100.0%</p> <p>FIRST NATIONAL BANK OF ONEIDA (10000008039) excluded from Aggregate</p>																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-23
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Campbell County MSA	39	6,769	17.7	1,324	0.0	0.0	0.0	74.0	64.1	66.6	26.0	35.9	33.4	0.0	0.0	0.0	0.0	0.0	0.0
Scott County Non-MSA	181	22,173	82.3	285	0.0	0.0	0.0	51.7	58.0	56.1	48.3	42.0	43.9	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>220</b>	<b>28,942</b>	<b>100.0</b>	<b>1,609</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>66.0</b>	<b>59.1</b>	<b>64.8</b>	<b>34.0</b>	<b>40.9</b>	<b>35.2</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>
<p><i>Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.</i></p> <p><i>Due to rounding, totals may not equal 100.0%</i></p> <p><i>FIRST NATIONAL BANK OF ONEIDA (10000008039) excluded from Aggregate</i></p>																			

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																				<b>2021</b>
	<b>Total Home Mortgage Loans</b>				<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>			
<b>Assessment Area:</b>	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	
Campbell County MSA	14	1,054	14.4	1,713	34.8	35.7	9.5	23.2	14.3	17.7	18.2	14.3	19.4	23.7	35.7	36.1	0.0	0.0	17.4	
Scott County Non-MSA	83	9,311	85.6	337	29.0	8.4	4.2	20.1	10.8	14.8	19.9	22.9	25.2	30.9	53.0	40.7	0.0	4.8	15.1	
<b>Total</b>	<b>97</b>	<b>10,365</b>	<b>100.0</b>	<b>2,050</b>	<b>32.9</b>	<b>12.4</b>	<b>8.6</b>	<b>22.2</b>	<b>11.3</b>	<b>17.2</b>	<b>18.8</b>	<b>21.6</b>	<b>20.3</b>	<b>26.2</b>	<b>50.5</b>	<b>36.8</b>	<b>0.0</b>	<b>4.1</b>	<b>17.0</b>	
<i>Source: 2015 ACS ; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100.0%</i>																				
<i>FIRST NATIONAL BANK OF ONEIDA (10000008039) excluded from Aggregate</i>																				

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2022-23</b>	
	<b>Total Home Mortgage Loans</b>				<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>			
<b>Assessment Area:</b>	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	
Campbell County MSA	39	6,769	17.7	1,324	32.8	12.8	15.0	22.8	15.4	21.6	19.7	25.6	23.0	24.7	41.0	27.0	0.0	5.1	13.4	
Scott County Non-MSA	181	22,173	82.3	285	26.2	9.9	8.1	25.9	14.9	17.9	18.1	21.5	29.5	29.8	47.5	32.6	0.0	6.1	11.9	
<b>Total</b>	<b>220</b>	<b>28,942</b>	<b>100.0</b>	<b>1,609</b>	<b>30.5</b>	<b>10.5</b>	<b>13.7</b>	<b>23.9</b>	<b>15.0</b>	<b>20.9</b>	<b>19.1</b>	<b>22.3</b>	<b>24.2</b>	<b>26.5</b>	<b>46.4</b>	<b>28.0</b>	<b>0.0</b>	<b>5.9</b>	<b>13.2</b>	
<p><i>Source: 2020 U.S. Census ; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.</i></p> <p><i>Due to rounding, totals may not equal 100.0%</i></p> <p><i>FIRST NATIONAL BANK OF ONEIDA (10000008039) excluded from Aggregate</i></p>																				

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2021**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Campbell County MSA	20	1,425	50.0	567	0.0	0.0	0.0	95.7	90.0	92.7	4.3	10.0	6.3	0.0	0.0	0.0	0.0	0.0	1.0
Scott County Non-MSA	20	290	50.0	201	0.0	0.0	0.0	43.0	45.0	55.4	57.0	55.0	44.1	0.0	0.0	0.0	0.0	0.0	0.5
<b>Total</b>	<b>40</b>	<b>1,715</b>	<b>100.0</b>	<b>768</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>76.4</b>	<b>67.5</b>	<b>83.0</b>	<b>23.6</b>	<b>32.5</b>	<b>16.1</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.9</b>

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

FIRST NATIONAL BANK OF ONEIDA (10000008039) excluded from Aggregate

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2022-23**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Campbell County MSA	31	2,678	43.7	450	0.0	0.0	0.0	68.9	67.7	72.6	31.1	32.2	27.0	0.0	0.0	0.0	0.0	0.0	0.4
Scott County Non-MSA	40	2,777	56.3	218	0.0	0.0	0.0	69.1	50.0	68.5	30.9	50.0	31.1	0.0	0.0	0.0	0.0	0.0	0.5
<b>Total</b>	<b>71</b>	<b>5,455</b>	<b>100.0</b>	<b>668</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>69.0</b>	<b>57.7</b>	<b>71.2</b>	<b>31.0</b>	<b>42.2</b>	<b>28.3</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.4</b>

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

FIRST NATIONAL BANK OF ONEIDA (10000008039) excluded from Aggregate



<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2021</b>
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Businesses with Revenues &lt;= 1MM</b>			<b>Businesses with Revenues &gt; 1MM</b>		<b>Businesses with Revenues Not Available</b>	
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>
Campbell County MSA	20	1,425	50.0	567	81.9	70.0	40.1	4.2	15.0	13.9	15.0
Scott County Non-MSA	20	290	50.0	201	80.7	25.0	39.1	4.8	0.0	14.6	75.0
<b>Total</b>	<b>40</b>	<b>1,715</b>	<b>100.0</b>	<b>768</b>	<b>81.4</b>	<b>47.5</b>	<b>39.9</b>	<b>4.4</b>	<b>7.5</b>	<b>14.1</b>	<b>45.0</b>
<p><i>Source: 2021 D&amp;B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.            Due to rounding, totals may not equal 100.0%</i></p> <p><i>FIRST NATIONAL BANK OF ONEIDA (10000008039) excluded from Aggregate</i></p>											

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2022-23</b>
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Businesses with Revenues &lt;= 1MM</b>			<b>Businesses with Revenues &gt; 1MM</b>		<b>Businesses with Revenues Not Available</b>	
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>
Campbell County MSA	31	2,678	43.7	450	85.8	80.6	52.9	3.2	9.7	11.1	9.7
Scott County Non-MSA	40	2,777	56.3	218	83.1	82.5	54.8	4.0	2.5	12.9	15.0
<b>Total</b>	<b>71</b>	<b>5,455</b>	<b>100.0</b>	<b>668</b>	<b>84.9</b>	<b>81.7</b>	<b>53.5</b>	<b>3.5</b>	<b>5.6</b>	<b>11.7</b>	<b>12.7</b>
<p><i>Source: 2023 D&amp;B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.            Due to rounding, totals may not equal 100.0%</i></p> <p><i>FIRST NATIONAL BANK OF ONEIDA (10000008039) excluded from Aggregate</i></p>											