



Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

May 16, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Cumberland Valley National Bank and Trust Company
Charter Number 10254

100 Main Street, London, Kentucky 40741

Office of the Comptroller of the Currency

10200 Forest Green Boulevard, Suite 501, Louisville, Kentucky 40223

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

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Overall CRA Rating

Institution's CRA Rating: This institution is rated **Outstanding**.

The lending test is rated: Outstanding.

The community development test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on a substantial majority of Cumberland Valley National Bank & Trust Company's (CVNB or Bank) lending taking place within its assessment area (AA); a reasonable loan-to-deposit (LTD) ratio; reasonable geographic distribution of lending by income of the geography; and an excellent distribution of lending among borrowers of different incomes and businesses of different sizes.
- The Community Development (CD) Test rating is based on adequate responsiveness to community needs through qualified CD loans, investments, and services.

Loan-to-Deposit Ratio

Considering the Bank's size, financial condition, and credit needs of the AA(s), the Bank's LTD ratio is reasonable.

CVNB's average LTD was 70.1 percent over the past 11 quarters, with a quarterly high of 77.5 percent and quarterly low of 61.4 percent. We compared this performance to 10 banks in the combined AAs with similar asset sizes and product types. These similarly situated banks had an average LTD of 77.7 percent, with a quarterly high of 104.8 percent and a quarterly low of 47.6 percent.

Lending in Assessment Area

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

Management originated 97.5 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. The following table details the Bank's lending within the AA by number and dollar volume during the evaluation period.

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		
	#	%	#	%		\$	%	\$	%	
Small Business	39	97.5	1	2.5	40	10,928,623	99	100,000	1	11,028,623
Total	39	97.5	1	2.5	40	10,928,623	99	100,000	1	11,028,623

Source: Random sample of business loans from bank records that were originated between January 1, 2019, and December 31, 2021.

Description of Institution

CVNB is an intrastate financial institution headquartered in London, Kentucky, in Laurel County. The Bank is wholly owned by Cumberland Valley Financial Corporation, a one-Bank holding company headquartered in London, Kentucky. The Bank serves its community through 14 locations within six counties in southeastern Kentucky. Six of these locations are in Laurel County. All branches are located in middle-income census tracts (CTs). All branches are full-service with ATMs and all but two have drive-through facilities.

As of December 31, 2021, the Bank reported \$725 million in total assets, \$662 million in deposits, \$411 million in total loans, and \$62 million in tier 1 capital. The primary lending focus over the assessment period was business-related loans. This conclusion is derived from CVNB's loan portfolio mix. The Bank's December 31, 2021, loan portfolio consisted of commercial real estate (excluding owner-occupied properties), 29.3 percent; one-to-four family residential real estate, 21.6 percent; owner-occupied commercial real estate, 18 percent; commercial loans, 16 percent; construction and development, 7.5 percent; consumer loans, 3 percent; obligations of states and political divisions, 1.7 percent; farmland and ag production, 1.7 percent; and all other loans, 1.1 percent.

The Bank is a full-service lender offering traditional banking products and services. CVNB offers commercial real estate, construction, development, equipment, and agriculture loans, as well as working capital lines of credit and a full range of consumer loans. Various deposit products for commercial and consumer purposes are offered, as well as wealth management and mobile banking services.

CVNB has delineated three AAs for CRA purposes. The first AA consists of four counties (Knox, Laurel, Pulaski, and Whitley) in Kentucky; the second AA consists of Madison County, Kentucky; and the third AA consists of Fayette County, Kentucky, which is part of the Lexington-Fayette MSA. The AA delineation is in conformance with the regulatory requirements and does not arbitrarily exclude low-to moderate-income (LMI) areas. For this evaluation, we combined the two non-metropolitan statistical area AAs into one rating area, with the Lexington-Fayette MSA location comprising the second rating area.

Competition in the AAs is strong. There are 57 financial institutions in the AAs with 229 branches, including offices of large national banks.

There are no legal or financial impediments affecting CVNB's ability to meet the credit needs of its AAs. The last CRA evaluation was performed by the Office of the Comptroller of the Currency (OCC) on May 20, 2019. The Bank received an Outstanding Rating.

Scope of the Evaluation

Evaluation Period/Products Evaluated

CVNB was evaluated under the Intermediate Small Bank Examination Procedures. These procedures evaluate a bank's performance based upon a Lending Test and a Community Development Test. The evaluation period for the Lending Test is January 1, 2019, through December 31, 2021. The evaluation period for the CD test is also from January 1, 2019, through December 31, 2021. Conclusions regarding the Bank's lending performance were based on a random sample of primary loan product originations

during this period. Based on both the number and dollar volume of loan origination data supplied by the Bank, the primary loan product was business loans. Business loans represented 83 percent of the dollar volume and 56 percent of the number of loan originations.

Selection of Areas for Full-Scope Review

The Bank's two AAs received a full-scope review. Refer to *Appendix A: Scope of Examination* for a list of products reviewed within the AAs.

Ratings

The Bank's overall rating is based on the State of Kentucky rating. The State rating is based on the full-scope review of CVNB's two AAs. More weight was given to the distribution of loans by income levels of borrower and gross annual revenues of businesses than the geographic distribution of loans. This was due to the number of low- and moderate-income CTs in the Bank's AAs during the evaluation period.

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 (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

State Rating

State of Kentucky

CRA rating for the State of Kentucky: Outstanding

The Lending Test is rated: Outstanding

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- A substantial majority of CVNB's loans are originated within its designated AAs.
- The Bank exhibits an excellent distribution of small business loans to businesses of different sizes.
- CVNB's LTD ratio is reasonable.
- The geographic dispersion of small business loans throughout the Bank's AA is reasonable.
- CVNB exhibits adequate responsiveness to CD needs in the AA through CD investments, loans, services, and donations. These CD activities are reasonable given the available opportunities in the AA and the Bank's capacity.

Description of Institution's Operations in Kentucky

As indicated earlier, CVNB's AAs are all in the State of Kentucky. A description of CVNB's operations in the State can be found under the *Description of Institution* and *Scope of Evaluation* on page 2.

Based on two community contacts from Fayette, Pulaski, and Madison counties; quality employment, transportation, before/after childcare, financial support, and Bank participation in collaborative activities are AA needs. Contacts expressed the willingness of local Banks to lend, volunteer, and donate to community projects.

Scope of Evaluation in Madison, Knox, Laurel, Pulaski, and Whitley Counties

The following table shows demographic information covering CVNB's AA1.

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2021-Non-MSA - Knox-Laurel-Madison-Pulaski-Whitley						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	62	0.0	25.8	53.2	21.0	0.0
Population by Geography	276,827	0.0	22.4	57.3	20.3	0.0
Housing Units by Geography	121,998	0.0	23.1	57.9	19.0	0.0
Owner-Occupied Units by Geography	69,291	0.0	21.1	56.6	22.3	0.0
Occupied Rental Units by Geography	37,107	0.0	23.0	61.9	15.1	0.0
Vacant Units by Geography	15,600	0.0	32.1	54.6	13.3	0.0
Businesses by Geography	20,060	0.0	15.1	61.3	23.6	0.0
Farms by Geography	826	0.0	11.9	55.9	32.2	0.0
Family Distribution by Income Level	71,477	24.5	16.5	18.5	40.6	0.0
Household Distribution by Income Level	106,398	26.9	14.9	16.4	41.8	0.0
Median Family Income Non-MSAs – KY		\$45,986	Median Housing Value			\$108,916
			Median Gross Rent			\$605
			Families Below Poverty Level			19.1%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

2015 U.S. Census Data: The total population of the combined non-MSA AA was 276,827. The combined non-MSA AA of Madison, Knox, Laurel, Pulaski, and Whitley Counties is located in Southeastern, Kentucky. The AA is divided into 62 CTs, the AA has 16 moderate-income tracts, 33 middle-income tracts, and 13 upper-income tracts. There are no low-income tracts located in the AA. The Bank's only locations are in middle income tracts.

Economic Data: Economic conditions in the AA prior to and during the COVID-19 pandemic were consistently trailing conditions in the state of Kentucky. With the exception of Madison County (2019-2021) and Laurel County (2021), the AA's annual unemployment rate for years 2019-2021 exceeded the statewide rate. Knox, Laurel, and Whitley Counties were designated as distressed during the entire evaluation period. Madison County was designated as distressed in 2019. Over 19 percent of AA

families live below the poverty level, exceeding the national average of 11.4 percent. The AA's 2020 median household income of \$45,986 was 32 percent lower than the national median household income of \$67,521.

The major industries in the AA include education and retail services. Major employers include Laurel County Public Schools, a Walmart Distribution Center, and Aisin Automotive.

Competition from other financial institutions is strong. CVNB's competitors include several local community banks and branches of large national banks and regional banks. As of June 30, 2021, these branches combined held \$5.32 billion in deposits with CVNB holding a 11.13 percent deposit market share.

Average Annual Unemployment Rate			
	2019	2020	2021
Kentucky	4.1	6.4	4.7
Madison	3.6	5.9	4.1
Knox	5.6	8.0	6.2
Laurel	4.6	6.7	4.5
Pulaski	4.5	7.1	4.9
Whitley	4.9	6.9	5.0

Scope of Evaluation in Lexington-Fayette MSA

The following table shows demographic information covering CVNB's AA2.

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2021 - Lexington-Fayette MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	82	12.2	22.0	34.1	31.7	0.0
Population by Geography	308,306	11.6	22.4	33.3	32.7	0.0
Housing Units by Geography	137,885	11.7	23.8	33.8	30.7	0.0
Owner-Occupied Units by Geography	68,194	6.3	16.2	35.2	42.3	0.0
Occupied Rental Units by Geography	57,558	17.0	32.2	32.0	18.7	0.0
Vacant Units by Geography	12,133	16.7	26.3	34.5	22.6	0.0
Businesses by Geography	36,729	7.8	16.1	39.8	36.2	0.0
Farms by Geography	1,222	6.9	10.0	43.3	39.9	0.0
Family Distribution by Income Level	72,466	23.3	15.7	18.3	42.6	0.0
Household Distribution by Income Level	125,752	26.9	15.4	15.7	42.1	0.0
Median Family Income MSA - 30460 Lexington-Fayette, KY MSA		\$66,800	Median Housing Value			\$180,124
			Median Gross Rent			\$781
			Families Below Poverty Level			12.1%
<i>Source: 2015 ACS and 2021 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

2015 U.S. Census data: The total population for the Lexington-Fayette MSA was 308,306. The Lexington-Fayette MSA AA is located in Central Kentucky. The AA consisted of 82 CTs, including 10 low-income tracts, 18 moderate-income tracts, 28 middle-income, and 26 upper-income tracts. The Bank has two locations in the AA. Both are located in middle-income census tracts.

Economic Data: Economic conditions in the AA prior to and during the COVID-19 pandemic have compared favorably to conditions in the state of Kentucky. According to the Bureau of Labor Statistics, the AA's annual unemployment rate for the years 2019-2021 was 3.1 percent, 5.6 percent, and 3.9 percent, respectively. This was well below the statewide unemployment rates of 4.1 percent, 6.4 percent, and 4.7 percent.

The major industries in the AA include health care, education, manufacturing, and retail. Major employers include the University of Kentucky, Fayette County Public Schools, Kentucky One Health, and Xerox.

Competition from other financial institutions is strong. CVNB's competitors include several local community banks and branches of large national banks and regional banks. As of June 30, 2021, these branches combined held \$11.9 billion in deposits with CVNB holding just 0.3 percent deposit market share.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KENTUCKY

LENDING TEST

The Bank's performance under the Lending Test in the State of Kentucky is rated Outstanding.

Distribution of Loans by Income Level of the Geography

The Bank exhibits reasonable geographic distribution of loans in the State of Kentucky.

Small Loans to Businesses

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

AA1

Lending to geographies of different income levels in the AA reflects reasonable dispersion. There were no low-income CTs in the AA. The Bank originated 10.0 percent of small business loans in moderate-income CTs. This was below 15.1 percent of businesses located in the moderate-income CTs and the aggregate lending comparator of 17.3 percent. Seventy-seven percent of loans were in communities that were designated as distressed or underserved during the assessment period. There are no low-income CTs and moderate-income CTs only make up 25.8 percent of the AA contributing to the difficulty to originate loans in these areas. Further, due to census changes in 2015, none of the Bank's branches are now located in moderate-income CTs, which also contributes to the difficulty lending in these areas.

AA2

Lending to geographies of different income levels in the AA reflects excellent dispersion. The Bank originated 10.3 percent and 17.2 percent of small business loans in low- and moderate-income CTs. This was above the 7.8 percent and 16.1 percent of small businesses located in low- and moderate-income CTs. The Bank also exceeded aggregate lending comparator of 8.0 percent and 15.2 percent, respectively.

Distribution of Loans by Income Level of the Borrower

The Bank exhibits excellent distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the Bank.

Small Loans to Businesses

AA1

CVNB's distribution of loans to businesses of different sizes is excellent in AA1. The Bank originated 83.3 percent of loans to businesses with revenues of less than \$1 million. While this is below the 85.6 percent of small businesses in the AA, it is greater than the aggregate lending comparator of 33.1 percent. Of the loans originated, there are 10 percent with revenues not reported due to the loan originations being a part of the SBA's PPP loan program in which gross revenue information was not required to be obtained to provide funding to businesses.

AA2

CVNB's distribution of loans to businesses of different sizes is excellent in AA2. The Bank originated 83.3 percent of loans to businesses with revenues less than \$1 million. While this is below the 87.1 percent of small businesses in the AA, it is greater than the aggregate lending comparator of 40.3 percent. Of the loans originated, there are 3.3 percent with revenues not reported due to the loan originations being a part of the SBA's PPP loan program in which gross revenue information was not required to be obtained to provide funding to businesses.

The figures above include consideration of PPP loans originated by the Bank during the evaluation period.

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

Responses to Complaints

CVNB did not receive any written complaints regarding its CRA performance during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The Bank's performance under the Community Development Test in the State of Kentucky is rated Satisfactory.

Based on a full-scope review, the Bank exhibits adequate 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

Refer to the Community Development Loan table below for the facts 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.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
AA1				
<i>Business</i>	10	48.0	3,674	22.0
<i>Non-Profit</i>	8	38.0	6,526	39.0
<i>Rental Housing</i>	0	0.0	0	0.0
<i>PPP</i>	3	14.0	6,493	39.0
AA1 Total	21	80.8	16,693	72.7
AA2				
<i>Business</i>	0	0.0	0	0.0
<i>Non-Profit</i>	2	40.0	2,000	40.0
<i>Rental Housing</i>	1	20.0	500	8.0
<i>PPP</i>	2	40.0	3,753	52.0
AA2 Total	5	19.2	6,253	27.3
Grand Total	26	100.00	22,946	100.0

CVNB demonstrated adequate responsiveness to the CD needs of the AA through community development loans. During the evaluation period the Bank originated 26 qualifying CD loans (including Paycheck Protection Program (PPP) loans) totaling \$23 million or 36.9 percent of tier 1 capital. Of these loans, 18 or \$11.6 million of total community development loans were located in distressed communities.

Number and Amount of Qualified Investments

Assessment Area	Current Period		Total			
	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
AA1	4	\$320	4	100.0	\$320	100.00
AA2	0	0	0	0	0	0

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

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

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

CVNB's amount of qualified CD investment continues to demonstrate adequate responsiveness to the development needs in the AA.

During the evaluation period, the Bank purchased four school district bonds totaling \$320,000. These bonds were used to finance revitalization efforts in schools in AA1 located in distressed and underserved communities.

CVNB made over \$350,000 in donations. Of these donations, \$197,685 were made to qualified organizations, notably United Way of South-Central Kentucky, local schools, and the Kiwanis Club of Laurel County who provides assistance to children in need.

Extent to Which the Bank Provides Community Development Services

The Bank offered a variety of secondary market loans during the evaluation period. These loans totaled \$17.5 million, including \$2.4 million in VA loans, \$6.3 million in RHS loans, and \$8.9 million in FHA loans. CVNB participated in numerous programs to help LMI individuals including SBA's PPP, COVID-19 deferrals, and the Federal Home Loan Bank Welcome Home Program. The Bank also offers checking accounts, bill pay, online banking, and mobile banking free of charge which improves banking access for LMI individuals.

Senior management and employees of CVNB provided additional CD services in the AAs. 13 employees volunteered for The Backpack Club Program, providing meals to children in need located in distressed and underserved communities. Multiple employees also served as Board members in local organizations supporting local small business development and LMI families. Some of the notable Board memberships include Richmond Chamber of Commerce, United Way of South-Central Kentucky, Gilbert-Bunnell Foundation, London Laurel County Industrial Development Authority, Habitat for Humanity, SOAR Summit, Southern Kentucky Chamber. Each named Chamber of Commerce and the London Laurel County Industrial Development Authority provide training and support for developing businesses in the AAs. United Way of South-Central Kentucky provides support for health, education, and financial stability for all individuals. The Gilbert Bunnell Foundation provides equipment and apparel to children in need. Habitat for Humanity provides housing and home ownership support to LMI families. SOAR Summit provides economic opportunities, growth mindset, job creation and healthcare for individuals in Eastern Kentucky.

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 MSA(s) and non-MSA(s) 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:	Lending Test (excludes CD loans): (January 1, 2019, to December 31, 2021) Investment and Services Tests and CD Loans: (January 1, 2019, to December 31, 2021)	
Bank Products Reviewed:	Small business, community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Not applicable		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Kentucky		
Madison, Knox, Laurel, Pulaski, and Whitley Counties	Full Scope	
Lexington-Fayette MSA	Full Scope	

Appendix B: Summary of MMSA and State Ratings

RATINGS Cumberland Valley National Bank and Trust Company			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
CVNB	Outstanding	Satisfactory	Outstanding
State:			
Kentucky	Outstanding	Satisfactory	Outstanding

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Metropolitan Division: 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

Content of Standardized Tables

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

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

- Table 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 Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																2019-21		
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available- Income Tracts		
	#	\$	% of Total	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
AA1	30	5,807	50.0	0.0	0.0	0.0	15.1	10.0	17.3	61.3	76.7	58.8	23.6	13.3	24.0	0.0	0.0	0.0
AA2	30	16,712	50.0	7.8	10.3	8.0	16.1	17.2	15.2	39.8	51.7	40.5	36.2	20.7	36.2	0.0	0.0	0.0

Source: 20XX D&B Data; 01/01/20XX - 12/31/20XX Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues										2019-21	
Assessment Area:	Total Loans to Small Businesses			Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
AA1	30	5,807	50.0	85.6	83.3	33.1	3.7	16.7	10.8	10.0	
AA2	30	16,711	50.0	87.1	83.3	40.3	3.8	16.7	9.1	0.0	

Source: 20XX D&B Data; 01/01/20XX - 12/31/20XX Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0