



PUBLIC DISCLOSURE

February 22, 2021

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

Vinton County National Bank
Charter Number 2036

112 West Main Street
McArthur, OH 45651

Office of the Comptroller of the Currency

Central Ohio Field Office
655 Metro Place South, Suite 625 Dublin,
OH 43017

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: Outstanding.

The major factors that support this rating include:

- The Lending Test rating is based on the state rating and the following overall conclusions.
 - The loan-to-deposit (LTD) ratio is reasonable.
 - A substantial majority of the bank’s loans are inside the assessment areas (AAs).
 - The bank exhibits excellent geographic distribution of loans in its AAs.
 - The bank exhibits an excellent distribution of consumer loans to individuals of different income levels.
- The Community Development (CD) Test rating is based on the state rating, which is outstanding. Overall, the bank’s level of CD lending, qualified investments, and CD services represents excellent responsiveness to CD needs, considering the bank’s capacity and the need and availability of such opportunities for CD in the AAs.

Loan-to-Deposit Ratio

Considering the bank’s size, financial condition, and credit needs of the AAs, the bank’s loan-to-deposit ratio is reasonable.

The Vinton County National Bank’s (VCNB or the bank) quarterly average LTD ratio over the 12 quarters since the previous CRA evaluation (December 31, 2017 to September 30, 2020) is 84.1 percent. The ratio ranged from a low of 77.3 percent at September 30, 2020, to a high of 87.1 percent at June 30, 2018. The bank’s quarterly average LTD ratio of 84.1 percent is reasonable when compared to financial institutions of similar size in the bank’s AAs, which includes 12 financial institutions with total assets less than \$2 billion and bank offices in the AAs. The other 12 financial institutions have an average LTD ratio of 86 percent. During the evaluation period, there was strong competition from other financial institutions.

Lending in Assessment Area

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

The bank originated and purchased 80.1 percent of its total loans inside the bank’s AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	

Home Mortgage	1,425	80.7	340	19.3	1,765	239,181	79.4	62,174	20.6	301,355
Consumer	36	60.0	24	40.0	60	861	62.6	514	37.4	1,375
Total	1,461	80.1	364	19.9	1,825	240,042	79.3	62,688	20.7	302,730

Source: 01/01/18 – 12/31/20 Bank Data.
Due to rounding, totals may not equal 100.0%.

Description of Institution

VCNB is a wholly owned subsidiary of Community Bancshares, Inc. Both the main office and the holding company are headquartered in McArthur, Ohio, the county seat of Vinton County. As of December 31, 2020, total assets were \$1.2 billion with \$779 million in net loans and leases, \$1 billion in total deposits, and \$117.4 million in tier 1 capital. There is no merger or acquisition activity that affects the scope of the bank's operations during the evaluation period.

During the evaluation period, VCNB operated 17 full-service banking offices and four non-branch (offsite) automated teller machines (ATMs) in Ashville, McArthur, Wilkesville, Chillicothe, Circleville, Commercial Point, Richmond Dale, Bremen, Lancaster, Canal Winchester, Pataskala, Grove City, Logan, Jackson, and Laurelville, Ohio. All branches offer drive-up services and ATM access. One branch is in a low-income census tract (CT), five branches are in moderate-income CTs, three are in distressed middle-income nonmetropolitan CTs, with the remaining offices in middle- and upper-income CTs. Of the four non-branch ATMs, two are in moderate-income CTs in Amanda and Chillicothe, Ohio, one is in a distressed middle-income nonmetropolitan CT in McArthur, Ohio, and one is in a middle-income CT in Laurelville, Ohio. Since the previous evaluation, the bank closed its Jackson County Branch (920 Veterans Drive Jackson, Ohio) in July 2020, and opened its new Jackson County Branch (471 McCarty Lane Jackson, Ohio) in October 2020. The bank closed the Jackson County Branch on Veterans Drive because it was within two miles of the new Jackson County Branch. On December 31, 2020 at the end of the business day, VCNB closed its Wilkesville Branch in Vinton County. This branch is near the McArthur and Jackson Branches. In December 2020, the bank also closed two non-branch, non-deposit taking ATMs, one in Chillicothe and one in McArthur. The bank has branches near the closed ATMs. The closures had no impact on the analysis since the branches/ATMs were active during the full review period.

VCNB's primary business focus remains retail lending. The bank offers a variety of standard lending 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.

As of the December 31, 2020, Consolidated Reports of Condition and Income (Call Report) and Uniform Bank Performance Reports (UBPR), VCNB's total loans equaled \$786 million representing 66.6 percent of total assets. The composition of loans includes consumer of 23.2 percent, residential real estate (home mortgage) including home equity lines of credit of 45.3 percent, commercial/industrial and commercial real estate (business) of 27.8 percent, farm loans of 1.8 percent, and all other loans of 1.9 percent. During the evaluation period, the bank sold approximately \$76 million in home mortgage loans to the secondary market.

VCNB is a single state financial institution with two AAs in the State of Ohio, which is the bank's only rating area. The AAs meet the requirements of the CRA regulation and do not arbitrarily exclude low-

and moderate-income (LMI) geographies. The AAs are described in the “Scope of the Evaluation” under “Selection of Areas for Full-Scope Reviews.”

VCNB’s last CRA Performance Evaluation was dated January 16, 2018, and the overall CRA rating was Satisfactory. There are no financial or legal impediments that affected the bank’s ability to help meet the credit needs of its AAs during the evaluation period. However, the Coronavirus Disease (also referred to as COVID-19) pandemic in 2020 impacted the local economy, including unemployment data. The U.S. Small Business Administration (SBA) Paycheck Protection Program (PPP) provided loans to help businesses keep their workforces employed during the COVID-19 crisis. The bank was particularly responsive to the SBA’s PPP and originated a significant volume of PPP loans, given the bank’s size and capacity.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The Office of the Comptroller of the Currency (OCC) conducted a CRA evaluation to assess the bank’s record of meeting the credit and CD needs of its entire community, including LMI areas. The OCC used intermediate small bank CRA evaluation procedures to assess the bank’s performance under the Lending Test and CD Test. The OCC analyzed lending activity in full-year increments during the evaluation period, January 1, 2018 to December 31, 2020. The CD Test considered CD loans, investments, and services since the previous CRA evaluation from January 17, 2018 to December 31, 2020 (CD evaluation period).

With an evaluation period end date of December 31, 2020, qualifying activities performed in response to the significant impact the Coronavirus pandemic has had on economies across the United States will be included in this evaluation.

Based on discussions with management and the number and dollar volume of loan origination data supplied by the bank, the bank’s primary lending focus is home mortgage and consumer lending. Based on the number of originated and purchased loans during the evaluation period (2018 – 2020), consumer loans accounted for 74 percent, home mortgage loans accounted for 15 percent, business loans accounted for 10 percent, and farm loans accounted for 1 percent of total loan originations and purchases. Based on the dollar volume of originated and purchased loans during the evaluation period, consumer loans accounted for 37 percent, home mortgage loans accounted for 36 percent, business loans accounted for 25 percent, and farm loans accounted for 2 percent of total loan originations and purchases. Of the consumer loan originations during the evaluation period, approximately 63 percent were auto secured loans.

To evaluate the bank’s performance, the OCC relied on internal bank reports for consumer loans. In each AA, the OCC transaction tested 60 consumer loans (auto secured) originated or purchased during the evaluation period to assess the bank’s performance relative to the geographic and borrower income distributions, as well as lending in the AA. The OCC used all Home Mortgage Disclosure Act (HMDA) data for years 2018, 2019, and 2020 to analyze the bank’s home mortgage loan performance.

For analysis purpose, the OCC compared the bank’s lending performance with demographic data from the 2015 American Community Survey (ACS) U.S. Census Data. No affiliate activity was included in

this analysis. Refer to the table in appendix A, Scope of the Examination, for more information on the scope of the review.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of the AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same 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 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.

VCNB has two AAs in the State of Ohio. The AAs are as follows:

- Jackson, Ross, and Vinton Counties, in their entirety, in a non-MSA (Non-MSA AA); and
- Fairfield, Hocking, and Pickaway Counties in their entirety, 14 CTs in Franklin County, and five CTs in Licking County in the Columbus, OH MSA 18140 (MSA AA).

The OCC completed a full-scope review for each AA. Jackson County was added to the Non-MSA AA in 2017 with the opening of a branch in that county. The bank’s AAs remained the same throughout the evaluation period. 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 evaluation.

Ratings

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

VCNB operates in the State of Ohio, with all branches in Ohio. The State of Ohio rating is based on performance in both AAs, the MSA AA and the Non-MSA AA. Each AA was weighted equally in this evaluation. 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) 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 bank has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this bank engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the bank'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: Outstanding.

The Lending Test is rated: Outstanding.

The Community Development Test is rated: Outstanding.

The major factors that support this rating include:

- The bank exhibits excellent geographic distribution of loans in the state.
- The bank’s distribution of consumer loans reflects an excellent distribution of loans to individuals of different income levels.
- The bank responsiveness to CD needs of the AAs through CD lending, qualified investments, and CD services is overall excellent.

Description of Institution’s Operations in Ohio

During the evaluation period, VCNB operated 17 branches and four non-branch ATMs located throughout eight counties in central Ohio. VCNB’s primary business focus remains retail lending (consumer and home mortgage). VCNB has two AAs; one which is part of the Columbus, OH MSA 18140 (MSA AA) and the other located in a non-MSA in Ohio (Non-MSA AA). The MSA AA consists of 67 CTs in Franklin, Licking, Pickaway, Fairfield, and Hocking Counties. The Non-MSA AA consists of Vinton, Jackson, and Ross Counties. The CTs in the AAs are contiguous, meet the requirements of the CRA, and do not arbitrarily exclude any LMI geographies. Bank management selected the AAs based on their targeted lending territory, the area with the most deposit and lending activity, and office locations. Each AA is described below.

Ross, Jackson, and Vinton counties in the Non-MSA AA and Hocking County in the MSA AA are officially designated as Appalachia by the federal government. According to the Appalachian Regional Commission (ARC), Appalachia lags behind the rest of the nation. As of 2020, ARC designated Ross, Hocking, Jackson, and Vinton counties as being “at risk” or “transitional” for economic status. According to ARC, at risk counties are at risk of becoming economically distressed and transitional counties are transitioning between strong and weak economies.

MSA AA

Demographic Information of the Assessment Area						
Assessment Area: MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #

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.

Geographies (Census Tracts)	67	4.5	25.4	50.7	17.9	1.5
Population by Geography	348,782	2.7	21.3	52.3	22.6	1.0
Housing Units by Geography	139,025	3.0	23.1	52.5	21.4	0.0
Owner-Occupied Units by Geography	92,448	1.2	19.6	52.7	26.5	0.0
Occupied Rental Units by Geography	34,822	7.4	31.0	51.1	10.6	0.0
Vacant Units by Geography	11,755	4.1	27.1	55.1	13.7	0.0
Businesses by Geography	20,002	5.3	19.4	50.5	24.7	0.0
Farms by Geography	1,077	1.4	19.8	55.2	23.7	0.0
Family Distribution by Income Level	92,317	19.6	18.3	22.3	39.9	0.0
Household Distribution by Income Level	127,270	21.4	15.8	18.2	44.6	0.0
Median Family Income MSA - 18140 Columbus, OH MSA		\$70,454	Median Housing Value			\$150,481
			Median Gross Rent			\$820
			Families Below Poverty Level			7.8%
<p>Source: 2015 ACS and 2020 Dun and Bradstreet (D&B) Data. Due to rounding, totals may not equal 100.0%. (*) The NA category consists of geographies that have not been assigned an income classification.</p>						

The MSA AA includes all of Fairfield, Hocking, and Pickaway Counties and 14 CTs in Franklin and five CTs in Licking Counties in Ohio. There are ten counties in the Columbus, OH MSA 18140. However, the bank's Columbus MSA AA does not include the MSA counties of Delaware, Madison, Morrow, Perry, and Union counties, as the bank does not have branches in those counties. The AA is comprised of contiguous CTs and does not arbitrarily exclude any LMI areas. The bank has 11 banking offices throughout this AA, with one office in a low-income CT, four in moderate-income CTs, and the remaining in middle- and upper-income CTs. Additionally, the bank has two non-branch ATMs in this AA. According to the 2015 ACS U.S. Census Data, the MSA AA consists of 67 CTs with three low-income, 17 moderate-income, 34 middle-income, 12 upper-income CTs, and one CT that has not been assigned an income classification.

The MSA AA continues to experience population growth greater than the average growth in the State of Ohio. According to the 2015 ACS U.S. Census, the MSA AA population is 348,782. The MSA AA population grew about 2.4 percent since the 2010 U.S. Census population of 340,590. The MSA AA population represents 3 percent of the state's population of 11.7 million. The population growth in the MSA AA exceeded the population growth in the State of Ohio, which was 1.3 percent since the 2010 U.S. Census. Approximately 24 percent of the population live in LMI geographies in the MSA AA.

The AA includes 92,317 families and 127,270 households. Low-income families represent 19.6 percent and moderate-income families represent 18.3 percent of total families in the MSA AA. The Federal Financial Institutions Examination Council's (FFIEC) weighted average median family income (updated for each year) for the MSA AA was \$76,000 for 2018 and \$77,900 for 2019 and 2020.

According to the 2015 ACS U.S. Census Data, the median housing value in the MSA AA was \$150,481. Based on the weighted average of Census MSA Median Family Income of \$70,454 in the above table, low-income families make less than \$35,227 (individual income that is less than 50 percent of the area median family income) and moderate-income families make at least \$35,227 but less than \$56,363 (individual income that is at least 50 percent and less than 80 percent of the area median family income).

Overall median housing values are approximately 2.7 to 4.3 times the weighted average of Census MSA median family income of the LMI families in the AA. The housing costs relative to income may have a limiting effect on mortgage demand among LMI families. As of the 2015 ACS U.S. Census, there are 139,025 total housing units in the MSA AA, of which 66.5 percent are owner-occupied and 25.1 percent are rental occupied units. Approximately 7.8 percent of the families and 10.2 percent of the households live below the poverty level. Families and households below the poverty level make it especially difficult for this segment of the population to afford and maintain a home or qualify for a loan.

Competition in the MSA AA is strong due to the presence of many regional and community banks, as well as a growing number of credit unions moving into the area. Competition includes Huntington National Bank and JPMorgan Chase Bank, National Association (N.A.), both which have significant deposit market share in the AA. As of the June 30, 2020 Federal Deposit Insurance Corporation's (FDIC's) Deposit Market Share Report, there are 45 financial institutions operating 432 banking offices in the MSA AA, including VCNB. Approximately 63.3 percent of VCNB's total deposits at June 30, 2020, were in the MSA AA. The June 30, 2020 FDIC deposit market share data shows VCNB's \$619.5 million in total deposits in this AA ranks eleventh in overall deposit market share at 0.8 percent.

As stated above, the bank's primary business focus is home mortgage and consumer lending. VCNB ranks 24th out of 386 lenders in the AA in residential home mortgage volume based on the 2019 Peer Mortgage Data and 2015 ACS U.S. Census Data. VCNB had a 1.1 percent lending market share as of the 2019 Peer Mortgage Data Report. Top mortgage lenders in the AA include Huntington National Bank, US Bank, N.A., Quicken Loans, Wells Fargo Bank, N.A., and JPMorgan Chase Bank, N.A. During the evaluation period, 49.8 percent of the bank's home mortgage loan originations and purchases inside the AA were in the MSA AA.

During most of the evaluation period, the local economy in the MSA AA was growing and unemployment rates in 2018 and 2019 continued to improve. In 2020, the country's economy suffered from a global pandemic (COVID-19) and many people temporarily lost their jobs as a result, increasing the unemployment rate in the MSA AA. The AA's economy has entered a tentative recovery from the COVID-19 pandemic. Hocking County continues to have the highest unemployment rate in the AA. The unemployment rates (not seasonally adjusted) as of December 2020 for each county in the AA were lower than the state and national levels.

Unemployment Rates as of December 30 of each year (not seasonally adjusted)			
	2018	2019	2020
Fairfield	4.3	3.4	4.3
Franklin	3.9	3.1	4.9
Hocking	5.8	4.5	5.1
Licking	4.2	3.4	4.2
Pickaway	4.5	3.7	4.5
State of Ohio	4.8	3.8	5.2
United States	3.7	3.4	6.5

Source: Ohio Department of Job and Family Services/Office of Workforce Development/Bureau of Labor Market Information.

Major industries in the AA include manufacturing, education and health services, and trade. Primary employers in the MSA AA include the State of Ohio and local school districts in each county. Primary employers in Fairfield County include Fairfield Medical Center and Anchor Hocking. Primary

employers in Franklin County include OhioHealth, Ohio State University, JPMorgan Chase & Company, and Nationwide. Major employers in Hocking County include Kroger and Logan Health Care Center. Major employers in Licking County include Amazon and Licking Memorial Health Systems. Major employers in Pickaway County include Berger Health System and Sofidel.

As part of this CRA evaluation, the OCC reviewed information provided from interviews with representatives from affordable housing or other non-profit organizations. The contacts identified quality, affordable housing and financial literacy as needs in the community. One contact also identified a demand for utility and food assistance. One contact stated the lack of quality jobs in the area make rent difficult to pay, especially for units that are not substandard. In general, local financial institutions are adequately meeting the credit and CD needs of the community.

Non-MSA AA

Demographic Information of the Assessment Area						
Assessment Area: Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	27	0.0	18.5	70.4	11.1	0.0
Population by Geography	123,422	0.0	15.3	74.3	10.3	0.0
Housing Units by Geography	52,697	0.0	15.9	74.1	10.0	0.0
Owner-Occupied Units by Geography	32,914	0.0	13.8	74.7	11.4	0.0
Occupied Rental Units by Geography	13,328	0.0	20.2	71.6	8.2	0.0
Vacant Units by Geography	6,455	0.0	17.9	75.8	6.3	0.0
Businesses by Geography	5,700	0.0	27.0	64.3	8.7	0.0
Farms by Geography	352	0.0	16.8	71.6	11.6	0.0
Family Distribution by Income Level	31,662	24.3	19.2	20.4	36.2	0.0
Household Distribution by Income Level	46,242	26.5	16.7	18.5	38.3	0.0
Median Family Income Non-MSAs - OH		\$55,785	Median Housing Value			\$101,153
			Median Gross Rent			\$659
			Families Below Poverty Level			15.3%

Source: 2015 ACS and 2020 D&B Data.
 Due to rounding, totals may not equal 100.0%.
 (*) The NA category consists of geographies that have not been assigned an income classification.

The Non-MSA AA includes all of Jackson, Ross, and Vinton Counties. The AA is comprised of contiguous CTs and does not arbitrarily exclude any LMI areas. During the evaluation period, the bank had six banking offices throughout this AA, with one office in a moderate-income CT, three in distressed middle-income nonmetropolitan tracts, and two in middle-income CTs. Additionally, the bank had two non-branch ATMs in this AA, one in a moderate-income tract and one in a distressed middle-income nonmetropolitan tract. According to the 2015 ACS U.S. Census Data, the Non-MSA AA consists of 27 CTs with zero low-income, five moderate-income, 19 middle-income, and three upper-income CTs. As of 2018, there were seven distressed middle-income nonmetropolitan tracts. Two tracts changed from moderate to distressed middle-income nonmetropolitan tracts in 2019 and 2020. CT 9532 in Vinton County transitioned from moderate-income in 2018 to a distressed middle-

income nonmetropolitan tract in 2019 and 2020. CT 9574 in Jackson County transitioned from moderate-income in 2018 to a distressed middle-income nonmetropolitan tract in 2019 and 2020. Both tracts are considered distressed due to unemployment. These were the only two CT changes in the Non-MSA since the previous CRA evaluation. Changes were not significant and were accounted for in Tables O, P, U and V in Appendix B. The above table for the Non-MSA AA represents data as of 2020.

The Non-MSA AA continues to experience a decline in population, with a 2.1 percent decline from the 2010 U.S. Census to the estimated population as of 2019 (U.S. Census Data). According to the 2015 ACS U.S. Census, the Non-MSA AA population is 123,422, representing about 1 percent of the state's total population of 11.7 million. Approximately 15.3 percent of the population live in moderate-income geographies in the Non-MSA AA. Refer to the table below for population statistics in the AA.

Non-MSA AA Population				
	2010 U.S. Census	2015 ACS U.S. Census	Updated July 1, 2019 – Estimated (U.S. Census)	Percent Change from 2010 to 2019
Jackson County	33,225	32,854	32,413	-2.4
Ross County	78,064	77,334	76,666	-1.8
Vinton County	13,435	13,234	13,085	-2.6
Total Non-MSA AA	124,724	123,422	122,164	-2.1

Source: 2010 U.S. Census; 2015 ACS U.S. Census; U.S. Census.

The AA includes 31,662 families and 46,242 households. Low-income families represent 24.3 percent and moderate-income families represent 19.2 percent of total families in the Non-MSA AA. The FFIEC weighted average median family income (updated each year) for the State of Ohio for the Non-MSA AA was \$61,400 for 2018 and \$61,000 for 2019 and 2020.

According to the 2015 ACS U.S. Census Data, the median housing value in the Non-MSA AA was \$101,153. Based on the weighted average of Census MSA Median Family Income of \$55,785 in the table above, low-income families make less than \$27,893 (individual income that is less than 50 percent of the area median family income) and moderate-income families make at least \$27,893 but less than \$44,628 (individual income that is at least 50 percent and less than 80 percent of the area median family income). Overall median housing values are approximately 2.3 to 3.6 times the weighted average of Census MSA median family income of the LMI families in the AA. The housing costs relative to income may have a limiting effect on mortgage demand among some LMI families. As of the 2015 ACS U.S. Census, there are 52,697 total housing units in the Non-MSA AA, of which 62.5 percent are owner-occupied and 25.3 percent are rental occupied units. Approximately 15.3 percent of the families and 18.6 percent of the households live below the poverty level. Families and households below the poverty level make it especially difficult for this segment of the population to afford and maintain a home or qualify for a loan.

Competition in the Non-MSA AA is strong due to the presence of many regional and community banks, as well as a growing number of credit unions moving into the area. Competitors with significant deposit market share include Kingston National Bank, Wesbanco Bank, Inc., and PNC Bank, N.A. As of the June 30, 2020 FDIC's Deposit Market Share Report, there were 11 financial institutions operating 37 banking offices in the Non-MSA AA, including VCNB. Approximately 36.7 percent of VCNB's total deposits at June 30, 2020, were in the Non-MSA AA. The June 30, 2020 FDIC deposit market share

data shows VCNB's \$359.2 million in total deposits in this AA ranks first in overall deposit market share at 22 percent.

As stated above, the bank's primary business focus is home mortgage and consumer lending. VCNB ranks second out of 181 lenders in the AA in residential home mortgage volume based on the 2019 Peer Mortgage Data and 2015 ACS U.S. Census Data. VCNB had a 7.5 percent lending market share as of the 2019 Peer Mortgage Data Report. Top mortgage lenders in the AA include Huntington National Bank, Wesbanco Bank, Inc., and Fifth Third Bank, N.A. During the evaluation period, 50.2 percent of the bank's home mortgage loan originations and purchases inside the AA were in the Non-MSA AA.

Overall, the economic conditions in the Non-MSA AA are depressed, primarily in Jackson and Vinton Counties due to high unemployment rates. As stated above, the country's economy suffered from a global pandemic (COVID-19) in 2020 and many people temporarily lost their jobs as a result. The unemployment rates (not seasonally adjusted) as of December 2020 were higher than the state level in Jackson and Vinton Counties and higher than the national level in Vinton County. In Ross County, the unemployment rate was lower than the state and national rates.

Unemployment Rates as of December 30 of each year (not seasonally adjusted)			
	2018	2019	2020
Jackson County	7.1	6.6	6.2
Ross County	4.9	4.3	4.8
Vinton County	6.7	6.1	6.8
State of Ohio	4.8	3.8	5.2
United States	3.7	3.4	6.5

Source: Ohio Department of Job and Family Services/Office of Workforce Development/Bureau of Labor Market Information.

Major industries in the AA include manufacturing, education and health services, trade, and farming. Primary employers in Jackson County include the local school districts, Holzer Medical Center, and General Mills Inc. Primary employers in Ross County include the State of Ohio, local school districts, Adena Regional Health System, and Kenworth Truck Company. Major employers in Vinton County include the local school systems, State of Ohio, Austin Powder Co., and Crownover Lumber Co. Inc.

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

Scope of Evaluation in Ohio

The OCC performed a full-scope review for each AA. The data in the AAs was analyzed and presented as two AAs for purposes of this evaluation. We weighted each AA equally. Home mortgage and consumer loans are the bank's primary lending products and were evaluated under the Lending Test. The OCC transaction tested 60 consumer loans that were originated or purchased inside each AA for the geographic distribution and borrower income analysis. The OCC used all HMDA data for 2018, 2019, and 2020 for the home mortgage analysis. The OCC reviewed CD loans, investments, and services in each AA during the evaluation period. Refer to the "Scope of the Evaluation" section for more details.

Of the home mortgage loans originated or purchased inside the AAs, approximately half were in each AA. Additionally, half of the consumer loans in the sample were in each AA. According to the FDIC's Deposit Market Share Report as of June 30, 2020, approximately 63.3 percent of the bank's deposits are in the MSA AA, with 36.7 percent in the Non-MSA AA. Of the total loan originations and purchases during the evaluation period, 74 percent by number and 37 percent by dollar volume were consumer loans and 15 percent by number and 36 percent by dollar volume were home mortgage loans. We placed more weight on the consumer loan analysis because a substantial majority of the total loan originations and purchases during the evaluation period were consumer loans (74 percent by number).

For CD, we placed more weight on the bank's CD lending, as the bank was particularly responsive to the SBA's PPP loans in 2020. Refer to the "Number and Amount of Community Development Loans" under the "Community Development Test" for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's lending performance in the State of Ohio is excellent.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

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

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

MSA AA

The bank exhibits an excellent geographic distribution of home mortgage loans in the MSA AA. The percentage of home mortgage loans originated by the bank in the LMI CTs significantly exceeds both the demographic comparator and the aggregate lending data of other HMDA reporters.

Non-MSA AA

The bank exhibits an excellent geographic distribution of home mortgage loans in the Non-MSA AA.

The percentage of home mortgage loans originated by the bank in the moderate-income CTs exceeds the aggregate lending data of other HMDA reporters and is near to the demographic comparator. There are no low-income CTs in the Non-MSA AA.

In the mortgage lending analysis, the OCC considered several performance context factors. Of the 19 middle-income CTs in the AA, nine were distressed middle-income nonmetropolitan tracts in 2019 and 2020. As of 2018, seven were distressed middle-income nonmetropolitan tracts. The CTs were distressed due to unemployment. In this AA, the bank has one office in a moderate-income CT and three offices in distressed middle-income nonmetropolitan tracts.

Consumer Loans

Refer to Table U in the State of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The OCC compared the percentage of consumer loans originated or purchased by the bank to the percentage of households (demographic data) in the four geographic income categories, placing emphasis on the LMI geographies. As consumer loans are not subject to reporting requirements, no comparison to peer (aggregate) lending data was available.

The bank exhibits an excellent geographic distribution of consumer loans in both AAs.

MSA AA

The bank exhibits an excellent geographic distribution of consumer loans in the MSA AA. The percentage of consumer loans originated by the bank in the LMI CTs significantly exceeds the demographic comparators.

Non-MSA AA

The bank exhibits an excellent geographic distribution of consumer loans in the Non-MSA AA. The percentage of consumer loans originated by the bank in the moderate-income CTs significantly exceeds the demographic comparator. There are no low-income CTs in the Non-MSA AA.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans to individuals of different income levels, given the product lines offered by the bank.

The OCC placed more weight on the consumer loan analysis because 74 percent of total loan originations and purchases during the evaluation period were consumer loans. In the analysis, the OCC considered the substantial poverty rate in the AAs, as well as higher unemployment rates in the Non-MSA AA. Limited income is a substantial obstacle to credit qualification and serves to reduce the number of loans made to low-income borrowers.

Home Mortgage Loans

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

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

VCNB's overall distribution of home mortgage loans by borrower income level reflects reasonable distribution.

MSA AA

VCNB's distribution of home mortgage loans by borrower income level in the MSA AA reflects reasonable distribution. The bank's level of home mortgage lending to low-income borrowers is below the demographic data, but exceeds the aggregate data reported by other HMDA lenders. The bank's level of home mortgage lending to moderate-income borrowers is slightly below the demographic and aggregate data.

The OCC considered other factors in the bank's performance during the review, including the cost of homeownership in the AA as an obstacle to homeownership to LMI borrowers. As stated above, overall median housing values are 2.7 to 4.3 times the weighted average of median family income of LMI families in the AA. This obstacle may result in fewer opportunities to originate mortgage loans to LMI families. Additionally, 7.8 percent of the families live below poverty.

Competition in the AA is strong. As stated above, VCNB is ranked 24th out of 386 lenders in home mortgage market share at 1.1 percent, as of the 2019 Peer Mortgage Data. The top ten mortgage lenders in this AA account for over 38 percent of the home mortgage loan originations.

Non-MSA AA

VCNB's distribution of home mortgage loans by borrower income level in the Non-MSA AA reflects reasonable distribution. The bank's level of home mortgage lending to low-income borrowers is significantly below the demographic data, but near to the aggregate data reported by other HMDA lenders. The bank's level of home mortgage lending to moderate-income borrowers is below the aggregate data percentage reported by other HMDA lenders and demographic data, but is overall reasonable.

The OCC considered other factors in the bank's performance during the review, including the cost of homeownership in the AA as an obstacle to homeownership to LMI borrowers. As stated above, overall median housing values are 2.3 to 3.6 times the weighted average of median family income of LMI families in the AA. This obstacle may result in fewer opportunities to originate mortgage loans to LMI families. Additionally, 15.3 percent of the families live below poverty, which is considered substantial.

Competition in the AA is strong. As stated above, VCNB is ranked second out of 181 lenders in home mortgage market share at 7.5 percent, as of 2019 Peer Mortgage Data. A large financial institution is ranked first with a mortgage market share of 7.7 percent.

Consumer Loans

Refer to Table V in the State of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The OCC compared the percentage of consumer loans originated or purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level (demographic data). As consumer loans are not subject to reporting requirements, no comparison to peer (aggregate) lending data was available.

VCNB's overall distribution of consumer loans by borrower income level reflects excellent distribution.

MSA AA

VCNB's distribution of consumer loans by borrower income in the MSA AA reflects excellent distribution. The bank's level of consumer lending to low-income borrowers in the MSA AA is below demographic data. However, the bank's level of consumer lending to moderate-income borrowers significantly exceeds the demographic data. The OCC considered other factors in the bank's performance during the review, including that 10.2 percent of the households live below poverty. As stated above, limited income is a substantial obstacle to credit qualification and serves to reduce the number of loans made to low-income borrowers.

Non-MSA AA

VCNB's distribution of consumer loans by borrower income in the Non-MSA AA reflects excellent distribution. The bank's level of consumer lending to low-income borrowers in the Non-MSA is significantly below demographic data. However, the bank's level of consumer lending to moderate-income borrowers significantly exceeds the demographic data. The OCC considered other factors in the bank's performance during the review, including substantial poverty with 18.6 percent of the households living below poverty. All three counties in the AA are designated as Appalachia. According to ARC, all three are at risk or transitional for distressed economies.

Responses to Complaints

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

COMMUNITY DEVELOPMENT TEST

The bank's performance under the CD Test in the State of Ohio is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

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

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

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.

The number and dollar amount of qualified CD loans represent excellent responsiveness. During the evaluation period, VCNB originated 476 qualified CD loans inside their AAs and 14 CD loans in the broader statewide or regional area, totaling \$39.2 million, which equates to 33.4 percent of total tier 1 capital of \$117.4 million at December 31, 2020.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
MSA AA	292	59.6	\$19,498	49.7
Non-MSA AA	184	37.5	\$18,978	48.4
Statewide/Regional Loans with Indirect Benefit	14	2.9	\$743	1.9

MSA AA

VCNB originated 292 CD loans totaling \$19.5 million in the MSA AA, which equates to 26.2 percent of prorated (based on total deposits in the MSA AA) tier 1 capital. This demonstrates excellent responsiveness. In 2020, the SBA PPP provided loans to help businesses keep their workforces employed during the COVID-19 crisis. The PPP loans particularly helped revitalize or stabilize LMI CTs, or distressed middle-income nonmetropolitan tracts, and promoted economic development in these areas. The PPP loans are innovative, flexible loan products, given the current COVID-19 crisis. VCNB originated 286 PPP loans totaling \$18.1 million; 33 were originated in low-income CTs and 63 were in moderate-income CTs totaling \$1.6 million and \$3 million or 8.7 and 16.3 percent, respectively. The bank was particularly responsive to the community's needs in the MSA AA with 25 percent (by dollar volume) of the PPP loans in LMI CTs.

Among the other six CD loans originated, one loan for \$235,724 was made through the Ohio Treasurer's Grow Now program, providing economic development through loans at reduced interest rates to small businesses. Economic development in the form of job creation and retention is an identified need in the community through discussions with management and unemployment data. Three loans for \$365,000 were originated through the Ohio Treasurer's Ag-LINK program, providing interest rate reductions on agriculture business operation loans to help offset upfront operating costs. VCNB originated one loan for \$650,000 for renovations and construction of a facility to an organization that provides nutrition, education programs, and in-home services in a moderate-income area in Fairfield County. One loan for

\$115,000 was made to an organization in a low-income CT that provides housing for individuals transitioning from addiction.

Non-MSA AA

The bank originated 184 CD loans totaling almost \$19 million in the Non-MSAAA demonstrating excellent responsiveness. This equates to 44 percent of prorated tier 1 capital in the Non-MSA AA. Of the 184 loans, 168 were PPP loans originated in response to the COVID-19 pandemic. Of the 168 PPP loans totaling \$12.1 million, 36 were originated in moderate-income tracts and 69 were in distressed middle-income nonmetropolitan tracts totaling \$2.9 million and \$5.7 million or 24 and 47 percent, respectively. The bank was particularly responsive to the community needs in the Non-MSA AA with a total of 71 percent (by dollar volume) originated in moderate-income and distressed middle-income nonmetropolitan tracts, as economic development through job creation and retention is a community need. Additionally, the bank originated one innovative, flexible loan to a company for the manufacturing of personal protective equipment in a distressed middle-income nonmetropolitan tract.

Among the other 15 CD loans originated, one loan for \$880,000 was made through the Ohio Treasurer's Grow Now program, as described above under the MSA AA. Three loans for \$255,000 were made through the Ohio Treasurer's Ag-LINK program, as described above under the MSA AA. Eleven loans totaling \$4.2 million were to businesses or organizations that stabilize or revitalize moderate-income or distressed middle-income nonmetropolitan tracts or provide essential community services, including public safety services and affordable health care. Two of the 11 loans will create new jobs for individuals in Jackson County, a distressed middle-income nonmetropolitan area. One of the 11 loans was to an organization that serves both AAs (Jackson, Vinton, and Hocking counties).

Statewide/Regional Loans

VCNB is responsive to the CD needs and opportunities in its AAs; therefore, the OCC also considered CD lending in the broader statewide or regional area that provided indirect benefit to the bank's delineated AAs. The bank originated 14 PPP loans in the broader statewide or regional area in Ohio totaling \$742,563. Of the 14 PPP loans, three were originated in LMI CTs and four were in distressed/underserved middle-income nonmetropolitan tracts totaling \$52,722 and \$73,749, respectively. Additionally, VCNB originated four PPP loans in Florida totaling \$923,830 (not included in the table above).

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
MSA AA	0	0	38	2,785	38	58.5	2,785	68.0	0	0
Non-MSA AA	0	0	22	490	22	33.8	490	12.0	0	0
Statewide/ Regional Investments with Direct Benefit	0	0	4	508	4	6.2	508	12.4	0	0
Statewide/ Regional Investments with Indirect Benefit	0	0	1	315	1	1.5	315	7.6	0	0

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

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

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

VCNB's qualified investment activity represents adequate responsiveness. During the evaluation period, the bank made 65 qualifying investments, totaling approximately \$4.1 million. This equates to 3.5 percent of total tier 1 capital as of December 31, 2020.

MSA AA

VCNB exhibited adequate responsiveness to CD investment needs in the MSA AA during the evaluation period. The bank made 38 qualifying investments in this AA, 35 of which were donations totaling \$74,652 and three were bond/investment purchases totaling \$2.7 million. This equates to 3.7 percent of prorated tier 1 capital in the MSA AA as of December 31, 2020. The bank made one investment in 2018 for a bond purchase in Fairfield County, which went directly to the revitalization of the downtown area that led to an increase in business and job creation, including LMI areas. The bank made two investments in 2020, totaling \$1.7 million. The investments supported a local school district with most students receiving free or reduced lunch and improvements in local parks located in LMI areas. The 35 donations made throughout the evaluation period provided CD services to LMI individuals through food banks, financial literacy classes, homeless centers, and other economic and community development services.

Non-MSA AA

VCNB exhibited adequate responsiveness to CD investment needs over the evaluation period. The bank made 22 qualifying investments, 21 of which were donations totaling \$27,015 and one was a bond purchase totaling \$462,500. This equates to 1.1 percent of prorated tier 1 capital in the Non-MSA AA as of December 31, 2020. The one investment made during the evaluation period was a bond purchase supporting a local school district in a distressed middle-income nonmetropolitan tract. The 21 donations supported economic development, food banks, youth programs and other programs that provide support to LMI families and individuals.

Statewide/Regional Investments with Direct and Indirect Benefit

VCNB is responsive to CD needs and opportunities in its AAs; therefore, the OCC also considered CD investments in the broader statewide or regional area with direct and indirect benefit to the bank's delineated AAs. During the evaluation period, the bank made four qualifying investments, three donations and one bond purchase, that provided a direct statewide or regional benefit to serve the AAs totaling \$508,000. VCNB made three donations to a foundation which provides summer workshops/scholarships for LMI youth, including in the bank's AAs. One investment totaling \$500,000 was to purchase a mortgage backed security which directly benefits the AAs through the purchase of homes for LMI individuals. VCNB made one \$315,000 investment with an indirect statewide or regional benefit for a bond purchase in the regional area, which supports the revitalization and building of city service buildings, benefitting the LMI individuals that live in the area.

Extent to Which the Bank Provides Community Development Services

VCNB provided an adequate level of CD services during the review period and had a positive impact on AAs' needs. During the evaluation period, the bank had 28 employees provide CD services to 35 organizations in the AAs. Three employees provided CD services to four organizations that serve both AAs; these four are not included in the MSA AA and Non-MSA AA sections below. The organizations provide services to LMI families and individuals including financial literacy, food pantries, and other economic and community development needs. A bank employee is a board member with a local government workforce development organization that benefits both AAs through providing workforce development services across Fairfield, Ross, Pickaway, Vinton, and Hocking counties. One employee also provides financial advisory services as a committee member for a foundation that manages charitable funds in the Appalachia counties (Hocking, Jackson, Ross and Vinton). Another employee provides financial literacy workshops for two organizations that serve Appalachia counties, including counties in the bank's AAs. Economic development through job creation and retention and financial literacy are identified needs in the AAs.

The bank offers a full range of banking products and services throughout its branch network. VCNB has one branch in a low-income CT, five branches in moderate-income CTs, and three in distressed middle-income nonmetropolitan tracts. Services offered and hours of operation are comparable among locations. The bank's branches are well distributed throughout the AA and offer excellent accessibility to financial services for LMI individuals. To further support consumer access to financial services, the bank offers online and mobile banking services. The bank also offers interest on lawyer's trust accounts (IOLTAs), which are used to assist in providing legal help to LMI individuals. In 2020, the bank had 32 IOLTAs with average monthly balances totaling about \$2.2 million. During the evaluation period, VCNB also assisted three borrowers with obtaining down payment/closing costs assistance from the

Federal Home Loan Bank's (FHLB) Welcome Home program. The bank assisted these borrowers with obtaining grants totaling \$15,000 from the FHLB Welcome Home program.

MSA AA

Ten employees provided CD services to 17 different organizations in the MSA AA. The services provided were to organizations that strive to meet the economic and community services of the AA. Examples of CD service activities include serving as an assistant director/executive board committee member for an organization which provides food pantry services to LMI communities, and serving as a board member for a local economic development alliance which promotes small businesses and economic development.

Non-MSA AA

Fifteen employees provided CD services to 14 different organizations providing services within the Non-MSA AA. The services provided were to organizations that strive to meet the economic and community services of the AA. Examples include an employee conducting a financial literacy program through Junior Achievement for students in LMI schools and serving as a board member for a local economic development alliance.

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:	01/01/18 – 12/31/20	
Bank Products Reviewed:	Home mortgage and consumer loans CD loans, qualified investments, CD services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State - Ohio		
MSA AA	Full-Scope	The AA includes Fairfield, Hocking, and Pickaway counties in their entirety, and 14 CTs in Franklin and five CTs in Licking County.
Non-MSA AA	Full-Scope	The AA includes Ross, Jackson, and Vinton Counties in Ohio.

Appendix B: Summary of State Ratings

RATINGS: Vinton County National Bank			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Vinton County National Bank	Outstanding	Outstanding	Outstanding
State:			
Ohio	Outstanding	Outstanding	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 (MD): As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because -aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-,

and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

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

State of Ohio

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2018-20		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000s)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
MSA AA	709	137,437	49.8	17,494	1.2	3.0	1.2	19.6	31.6	15.1	52.7	51.2	51.4	26.5	14.2	32.2	0.0	0.0	0.0		
Non-MSA AA	716	101,744	50.2	2,935	0.0	0.0	0.0	13.8	12.8	11.4	74.7	80.9	74.6	11.4	6.3	14.0	0.0	0.0	0.0		
Total	1,425	239,181	100.0	20,429	0.9	1.5	1.1	18.1	22.2	14.6	58.5	66.1	54.7	22.6	10.2	29.6	0.0	0.0	0.0		

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data; 2019 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0%.*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2018-20		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$ (000s)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
MSA AA	709	137,437	49.8	17,494	19.6	7.2	6.8	18.3	17.6	19.9	22.3	23.6	23.1	39.9	43.3	32.2	0.0	8.3	17.9		
Non-MSA AA	716	101,744	50.2	2,935	24.3	5.0	6.2	19.2	15.5	17.6	20.4	21.1	23.8	36.2	51.0	32.5	0.0	7.4	19.9		
Total	1,425	239,181	100.0	20,429	20.8	6.1	6.7	18.5	16.6	19.6	21.8	22.3	23.2	38.9	47.2	32.3	0.0	7.9	18.2		

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data; 2019 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0%.*

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the													2018-20	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$ (000s)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
MSA AA	60	1,014	50.0	2.9	5.0	22.7	40.0	52.3	50.0	22.2	5.0	0.0	0.0	
Non-MSA AA	60	1,080	50.0	0.0	0.0	15.7	20.0	73.8	66.7	10.5	13.3	0.0	0.0	
Total	120	2,094	100.0	2.1	2.5	20.8	30.0	58.0	58.3	19.1	9.2	0.0	0.0	

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data.
Due to rounding, totals may not equal 100.0%.

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the													2018-20	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$ (000s)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
MSA AA	60	1,014	50.0	21.4	13.3	15.8	26.7	18.2	28.3	44.6	30.0	0.0	1.7	
Non-MSA AA	60	1,080	50.0	26.5	8.3	16.7	20.0	18.5	28.3	38.3	41.7	0.0	1.7	
Total	120	2,094	100.0	22.7	10.8	16.0	23.3	18.3	28.3	42.9	35.8	0.0	1.7	

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data.
Due to rounding, totals may not equal 100.0%.