



## **PUBLIC DISCLOSURE**

October 7, 2024

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

Farmers National Bank of Canfield  
Charter Number: 3654  
20 South Broad Street  
Canfield, OH 44406

Office of the Comptroller of the Currency  
200 Public Square Suite 1610  
Cleveland, OH 44144

NOTE: This document is an evaluation of this bank'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 bank. This evaluation is not, and should not be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial bank.

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## Overall CRA Rating

**Bank's CRA Rating:** This bank is rated Satisfactory.

The following table indicates the performance level of Farmers National Bank of Canfield (FNB or bank) with respect to the Lending, Investment, and Service Tests:

Performance Levels	Farmers National Bank of Canfield Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		
Low Satisfactory			X
Needs to Improve		X	
Substantial Noncompliance			

\* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based on High Satisfactory performance in Ohio, Pennsylvania, and in the Youngstown Multistate Metropolitan Statistical Area (MMSA).
- The Investment Test rating is based on Needs to Improve performance in Ohio, Pennsylvania, and in the Youngstown MMSA.
- The Service Test rating is based on High Satisfactory performance in the Youngstown MMSA and Low Satisfactory performance in Ohio and Pennsylvania.
- The bank originates a high percentage of loans inside its assessment areas (AAs).
- The bank makes limited use of flexible lending practices to serve AA credit needs.

### Lending in Assessment Area

A high percentage of the bank's loans are in its AAs.

The bank originated and purchased 75.2 percent by number and 80.2 percent by dollar of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

<b>Table D - Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans				Total \$
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2021	1,721	84.5	316	15.5	2,037	271,884,390	75.9	86,414,028	24.1	358,298,418
2022	1,503	92.3	126	7.7	1,629	251,143,723	90.1	27,602,939	9.9	278,746,662
2023	1,177	91.8	105	8.2	1,282	191,192,300	88.8	24,109,117	11.2	215,301,417
<b>Subtotal</b>	<b>4,401</b>	<b>89.0</b>	<b>547</b>	<b>11.0</b>	<b>4,948</b>	<b>714,220,413</b>	<b>83.8</b>	<b>138,126,084</b>	<b>16.2</b>	<b>852,346,497</b>
Small Business										
2021	1,265	73.1	466	26.9	1,731	139,869,000	78.4	38,435,000	21.6	178,304,000
2022	692	62.8	410	37.2	1,102	99,642,000	78.6	27,095,000	21.4	126,737,000
2023	646	72.3	248	27.7	894	90,145,000	80.4	21,928,000	19.6	112,073,000
<b>Subtotal</b>	<b>2,603</b>	<b>69.8</b>	<b>1,124</b>	<b>30.2</b>	<b>3,727</b>	<b>329,656,000</b>	<b>79.0</b>	<b>87,458,000</b>	<b>21.0</b>	<b>417,114,000</b>
Small Farm										
2021	285	43.2	375	56.8	660	20,971,000	55.3	16,929,000	44.7	37,900,000
2022	313	49.8	315	50.2	628	23,249,000	58.0	16,849,000	42.0	40,098,000
2023	234	51.8	217	48.2	451	17,473,000	55.2	14,204,000	44.8	31,677,000
<b>Subtotal</b>	<b>832</b>	<b>47.8</b>	<b>907</b>	<b>52.2</b>	<b>1,739</b>	<b>61,693,000</b>	<b>56.3</b>	<b>47,982,000</b>	<b>43.7</b>	<b>109,675,000</b>
<b>Total</b>	<b>7,836</b>	<b>75.2</b>	<b>2,578</b>	<b>24.8</b>	<b>10,414</b>	<b>1,105,569,413</b>	<b>80.2</b>	<b>273,566,084</b>	<b>19.8</b>	<b>1,379,135,497</b>
<i>Source: Bank Data; Due to rounding, totals may not equal 100.0%; Dollar amounts for Small Business, Small Farm and Consumer loans are multiplied by 1000.</i>										

Examiners considered the overall bank lending inside the bank's AAs when concluding upon the geographical distribution of loans within the bank's respective rating areas. Lending inside the AAs had a positive impact on the geographical distribution of loan ratings, throughout the evaluation period and rating areas.

## Description of Bank

FNB is a full-service interstate bank headquartered in Canfield, Ohio. It is a wholly owned subsidiary of Farmer's National Banc Corporation (FNBC) also headquartered in Canfield, Ohio. The bank has two subsidiaries, Farmers of Canfield Investment Company which holds municipal investments for tax purposes, and Farmers National Insurance, LLC which sells life, disability, and long-term care insurance as well as fixed annuities. FNBC also owns Farmers Trust Company, specializing in wealth management, and Farmers National Captive, Inc., TSEP Statutory Trust, and NAI Associates, which provides retirement and actuarial services.

On November 1, 2021, the bank completed its merger of Cortland Bank which resulted in an additional Ohio AA for the bank. On January 3, 2023, the bank announced that it had completed the merger of Emclave Financial Corporation. The Emclave merger expanded the bank's footprint into the state of Pennsylvania and added two additional AAs.

As of December 31, 2023, FNB had total assets of \$5.1 billion, loans and leases totaling \$3.2 billion, or 62.5 percent of total assets, and tier 1 capital of \$411.3 million. FNB's principal line of business is the origination and purchase of residential home mortgage loans. Secondly, the bank originates small business loans. During 2021, the bank offered Paycheck Protection Program (PPP) loans through the Small Business Association (SBA).

FNB offers a standard selection of traditional loan and deposit products for both personal and business customers. The bank offers a variety of different account access alternatives including telephone banking, mobile banking, online banking with bill-pay options, electronic statements, and loan and new deposit account applications. In addition to the services for consumers, the bank also offers a wide variety of account access alternatives for business customers, which include online banking for business customers, treasury management services, automated clearing house manager, remote deposit capture, and mobile banking.

As of December 31, 2023, FNB's loan portfolio totaled \$3.2 billion, with 78.6 percent of the portfolio secured by real estate. The portfolio consists of 34.4 percent non-farm, non-residential loans, 25.7 percent 1-4 family home mortgage loans, 9.6 percent commercial loans, 8.6 percent consumer loans, 8.2 percent farm loans, 4.9 percent multifamily loans, 4.5 percent HELOCs, 2.7 percent construction loans, and 1.4 percent other loans.

FNB operates 64 branches and 63 deposit-taking automated teller machines (ATMs) in the states of Ohio and Pennsylvania, along with two loan production offices in Ohio and one in Pennsylvania. For purposes of this evaluation, the bank operates in eight AAs and one MMSA across two state rating areas. Refer to appendix A for a summary of the AAs and respective counties. During the evaluation period, three branches were opened and seven were closed. The bank's most significant presence is in Ohio where the bank operates 46 branches and 54 deposit taking ATMs.

There are no legal, financial, or other factors impeding FNB's ability to help meet the credit needs of the AAs. The bank received a "Satisfactory" rating on their previous CRA performance evaluation dated February 1, 2021.

### **Product Innovation and Flexibility**

The bank offers several innovative and/or flexible loan products to serve AA credit needs. The bank's lending products provided flexibility for affordable housing and small businesses. FNB also developed a proprietary program designed to help low- and moderate-income (LMI) borrowers purchase homes. See the Product Innovation and Flexibility section in each rating area for details on rating area usage of these products.

Below are descriptions of the innovative and flexible products offered on a bank wide basis:

- SBA PPP Loans – Designed to provide a direct incentive for small businesses to keep workers on the payroll during the COVID-19 pandemic.
- Freddie Mac Home Possible Loan Program – Designed to assist very low- to low-income borrowers such as first-time homebuyers, move-up borrowers, and retirees seeking a low-down payment solution with flexible sources of down payments. Home Possible mortgage offers more options and credit flexibilities to responsibly increase homeownership for more borrowers. The program's pricing is competitive, and the down payment requirement is as low as 3.0 percent.

- Affordable Home Loan Program – This product was developed internally by the bank to meet the needs of LMI borrowers and in LMI census tracts (CTs) in the bank’s AAs and demonstrates innovative and responsiveness to community needs. The Affordable Home Loan features a grant up to \$3,000 to be used for down-payment or closing costs. Other features include 100.0 percent financing with no mortgage insurance, reduced processing fees and a \$250 mobile application promotion. Borrowers are required to complete a certified home buyer counseling session provided by a Housing and Urban Development-approved counseling agency.
- Home Emergency Loan Program (HELP) – The bank offered this innovative product beginning in April 2023 and is designed to assist LMI borrowers with loans up to \$10,000 for home repairs and improvements.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The OCC evaluated the bank using large bank performance criteria, which includes a lending test, investment test, and service test. The lending test evaluates FNB’s record of meeting the credit needs of its AAs through its lending activities. The investment and service tests evaluate the bank’s responsiveness to community development (CD) needs in its AAs. The evaluation period for the lending and CD tests is January 1, 2021, through December 31, 2023. In evaluating the bank’s lending performance, the OCC reviewed home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA) and small loans to businesses and farms reported under the CRA. Qualifying activities performed in response to the significant impact of the COVID-19 pandemic were considered in this evaluation. Examiners did not consider consumer loans in this evaluation as these lending products did not constitute a substantial majority of the bank’s business. Examiners also considered any multi-family loans that qualify as CD loans, as part of the CD lending assessment.

The bank’s merger activity during the evaluation period created new AAs. The Cortland Bank merger resulted in the addition of the Akron Metropolitan Statistical Area (MSA) beginning in 2022. The Emclave merger resulted in two new AAs in Pennsylvania (Pittsburgh MSA and the Pennsylvania Non-MSA) beginning in 2023. The merger also added Mercer County, Pennsylvania which created the Youngstown MMSA beginning in 2023.

FNB’s AAs were impacted by the 2020 U.S. Census demographic changes which took effect January 1, 2022. Examiners evaluated the bank’s lending performance for 2021 using 2015 American Community Survey (ACS) data. The bank’s 2022 and 2023 performance are evaluated separately utilizing 2020 U.S. Census data which reflects updated population and housing demographic information, as well as changes to the number and income designations of some CTs. The OCC provided more consideration to the bank’s lending performance during the 2022 to 2023 period as it represented a larger loan dollar volume. Aggregate small business and farm data for 2023 was not available during this evaluation. Therefore, examiners compared the bank’s business and farm lending performance to 2022 demographic and aggregate data.

Performance between low-income and moderate-income categories was weighted equally unless otherwise noted. The loan distribution analyses compared home mortgage loans and small loans to businesses and farms to demographic and aggregate data under the applicable lending test components.

## **Selection of Areas for Full-Scope Review**

In each state where the bank has an office, one or more AA(s) within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same MSA, 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 section for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

## **Ratings**

The bank’s overall rating is a blend of the state ratings, and where applicable, multistate ratings.

OCC examiners gave the most weight in the overall ratings to performance in the state of Ohio, as it represents the bank’s most significant deposit concentration, branch distribution, and HMDA reportable lending. The Youngstown MMSA received more weight than the state of Pennsylvania due to the volume of lending and deposit activity in the MMSA. When determining conclusions for the lending test in the rating areas, examiners gave more weight to the performance of home mortgage lending as compared to CRA small business and farm lending. Home mortgage lending received more weight as it accounted for 62.8 percent of loan originations and 68.4 percent of the loan volume within bank rating areas throughout the evaluation period.

The MMSA and state ratings are based on performance in all bank AAs. Refer to the “Scope” section under each State and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c) 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 assessment area by an affiliate whose loans have been considered as part of the bank’s lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this 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.

# Multistate Metropolitan Statistical Area Rating

## Youngstown MMSA

**CRA rating for the Youngstown MMSA<sup>1</sup>:** Satisfactory

**The Lending Test is rated:** High Satisfactory

**The Investment Test is rated:** Needs to Improve

**The Service Test is rated:** High Satisfactory

The major factors that support this rating include:

- Lending levels reflect good responsiveness to AA credit needs.
- The bank exhibits adequate geographic distribution of home mortgage and small business loans.
- The bank exhibits a good distribution of loans among individuals of different income levels and loans to business of different sizes, given the product lines offered by the bank.
- Service delivery systems are reasonably accessible to geographies and individuals of different income levels.
- The bank provides a good level of CD services.

## Description of Bank's Operations in Youngstown MMSA

The Youngstown MMSA consists of Mahoning, OH, Trumbull, OH, and Mercer, PA counties. Based on 2020 U.S. Census data, in 2023 the AA contained 164 CTs and included 14 low-income CTs, 37 moderate-income CTs, 77 middle-income CTs, and 34 upper-income CTs. Two CTs had no income designation.

As of December 31, 2023, the bank had \$2.0 billion in deposits in the MMSA, representing 51.6 percent of the bank's total deposits. During the evaluation period, the bank made \$102.3 million or 9.8 percent of its total dollar volume of CRA reportable loans within the AA.

The bank operates 22 branches and 25 deposit taking ATMs within this AA. According to the June 30, 2023, FDIC deposit-market share report, there were 15 FDIC-insured banks operating 118 branches in the AA. The bank had \$2.2 billion in deposits in the Youngstown MMSA, and deposits were equivalent to a 16.7 percent deposit market share. The bank's deposit market share ranked second out of 15 deposit taking banks.

The other four top competitors for deposits include Huntington National Bank, Premier Bank, First National Bank of Pennsylvania, PNC Bank N.A., which hold a combined 64.3 percent market share.

Most non-farm businesses in the AA are small as measured by the number of employees and gross revenues. According to 2023 D&B data, 88.9 percent of businesses located in the AA have less than \$1.0 million in gross annual revenues and 62.5 percent of businesses reported employing fewer than five

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<sup>1</sup>This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

employees. Only 1.3 percent of businesses are headquartered in the AA, while 92.1 percent operate from a single location.

According to Moody's Analytics, the Youngstown economy continues to move sideways with an underperforming labor market and employment trending down slightly. Declines have been broad-based, with professional/business services, education, and government industries contracting. There is minimal residential construction occurring leading to housing price increases. The area has historically been highly affordable with undervalued housing, but has been subject to recent price increases. The Youngstown area benefits from a large healthcare industry. Economic challenges include a heavy reliance on manufacturing, exposing the metro area to job losses, and declining population constraining the long-term growth of basic services. Mercy Medical Center is the primary employer in the MMSA. Other top employers include Youngstown Air Reserve Station, Windsor House, Steward ValleyCare Health System, and Youngstown State University.

Employment levels in the MSA improved during 2023. According to the U.S. Bureau of Labor Statistics, the unemployment rate in the MMSA was 5.2 percent in January 2023 which was higher than the state of Ohio and state of Pennsylvania unemployment rates of 4.2 percent and 4.0 percent, respectively. The unemployment rate dropped to 3.7 percent in the MMSA by December 2023 which is higher than the state rate of 3.1 percent in Ohio and 2.9 percent in Pennsylvania. The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty. According to the 2020 U.S. Census, 12.9 percent of families in the Youngstown MMSA had income below the federal poverty line.

Examiners utilized two community contacts in this AA, including a local nonprofit organization that focuses on mobilizing and utilizing resources to increase the quality of life for LMI residents, and a development organization that works to transform neighborhoods into meaningful places where people invest time, money, and energy. One contact commented on the need for emergency assistance, housing utility and food assistance. The organizations indicated a need for financial education, credit counseling, and one-on-one coaching. Additionally, there is a need for construction financing and lines of credit, as well as general operating support and funding for home ownership counseling and financial education.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Youngstown MMSA 2023</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	164	8.5	22.6	47.0	20.7	1.2
Population by Geography	541,243	5.7	17.8	49.7	26.1	0.7
Housing Units by Geography	259,266	6.7	19.3	49.2	24.2	0.6
Owner-Occupied Units by Geography	162,885	3.5	16.0	51.6	28.6	0.4
Occupied Rental Units by Geography	68,722	11.4	24.8	46.1	16.4	1.3
Vacant Units by Geography	27,659	14.2	24.8	42.8	17.8	0.4
Businesses by Geography	60,111	6.2	16.5	42.8	34.2	0.4
Farms by Geography	2,128	2.2	12.9	53.2	31.6	0.1
Family Distribution by Income Level	141,805	22.1	16.8	21.1	40.0	0.0
Household Distribution by Income Level	231,607	24.4	16.4	17.4	41.8	0.0
Median Family Income MSA - 49660 Youngstown-Warren-Boardman, OH-PA MSA		\$63,220	Median Housing Value			\$108,950
			Median Gross Rent			\$683
			Families Below Poverty Level			12.9%
<i>Source: 2020 U.S. Census and 2023 D&amp;B Data. Due to rounding, totals may not equal 100.0%. (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Scope of Evaluation in Youngstown MMSA

The Youngstown MMSA received a full-scope review for 2023.

Examiners placed more emphasis on home mortgage loans versus small loans to businesses in this MMSA. Farm loan received the least weight based on the low volume of loans during the evaluation period. Based on the total number of reported loans, excluding CD loans, home mortgage loans represented 73.1 percent of loan originations and purchases during the evaluation period in the Youngstown MMSA. Examiners did not consider consumer or multi-family loans in this evaluation, as these lending products did not constitute a substantial majority of the bank's business.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN YOUNGSTOWN MMSA

### LENDING TEST

The bank's performance under the Lending Test in the Youngstown MMSA is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the Youngstown MMSA is good.

### Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

<b>Number of Loans*</b>					
<b>Assessment Area</b>	<b>Home Mortgage</b>	<b>Small Business</b>	<b>Small Farm</b>	<b>Community Development</b>	<b>Total</b>
Youngstown MMSA	477	176	24	1	678

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

<b>Dollar Volume of Loans (000) *</b>					
<b>Assessment Area</b>	<b>Home Mortgage</b>	<b>Small Business</b>	<b>Small Farm</b>	<b>Community Development</b>	<b>Total</b>
Youngstown MMSA	\$73,308	\$29,012	\$1,245	\$400	\$103,965

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

According to 2023 Peer Mortgage Data, the bank held a 4.2 percent market share of home mortgage loan originations in the AA. The bank market share of home mortgage originations ranked fifth out of 324 lenders, in the top 1.5 percent of all lenders in the AA.

As the corresponding Peer Small Business and Farm data for 2023 was not available at the time of the evaluation, examiners did not perform an analysis of the bank's small business and farm lending activity.

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

The bank exhibits an adequate geographic distribution of loans in its AA.

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

Refer to Table O in the "MMSA" 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 geographical distribution of home mortgage loans in 2023 is adequate.

The proportion of bank loans in low-income CTs was well below both the percentage of owner-occupied housing units and the aggregate distribution of home mortgage loans. The proportion of bank home mortgage loans in moderate-income CTs was below both the percentage of owner-occupied housing units and the aggregate industry distribution of home mortgage loans.

However, examiners considered that a high percentage of LMI housing in the Youngstown MMSA is rental units. While single family homes comprise 82.1 percent and 87.5 percent of housing units in low- and moderate-income CTs, respectively, only 32.4 percent of units in low-income CTs and 52.1 percent of units in moderate-income CTs are owner occupied. In low-income CTs, this represents only 4,619 housing units.

FNB's rank and market share for lending in low-income CTs was adequate in 2023. Based on 2023 aggregate data, the bank ranked 23rd out of 84 lenders with 0.7 percent market share in low-income CTs. This corresponds to the top 31.0 percent of reporting lenders in the AA. FNB's rank and market share for lending in moderate-income CTs was excellent in 2023, ranking 11<sup>th</sup> out of 195 lenders with 2.4 percent market share. This corresponds to the top five percent of reporting lenders in the AA.

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

Refer to Table Q in the “MMSA” 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.

The geographic distribution of small loans to businesses in 2023 is good.

The bank’s proportion of small loans to businesses was below both the percentage of businesses and the aggregate industry distribution of small loans to businesses in low-income CTs. However, the bank’s proportion of small loans to businesses exceeded both the percentage of businesses and the aggregate industry distribution of small loans to businesses in moderate-income CTs.

### ***Small Loans to Farms***

Refer to Table S in the “MMSA” 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 farms.

The geographic distribution of small loans to farms in 2023 is poor.

The bank did not originate any small loans to farms located in low- or moderate-income CTs during 2023. However, limited lending opportunities exist in the MMSA as only 46 small farms are in low-income CTs and 269 small farms are in moderate-income CTs.

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

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. Examiners reviewed summary reports, maps, and analyzed the bank’s lending activity over the evaluation period to identify any gaps in the geographic distribution of loans and did not identify any unexplained, conspicuous gaps.

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

The bank exhibits a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.

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

Refer to Table P in the “MMSA” 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 borrower distribution of home mortgage loans in 2023 is good. The proportion of bank loans to low-income borrowers was well below the percentage of families and below the aggregate industry distribution of home mortgage loans. Due to the 12.9 percent poverty level in the MMSA, aggregate lending shows difficulty lending to low-income borrowers and are similarly well below the percentage of families. The proportion of bank loans to moderate-income borrowers exceeded the percentage of families and was near to the aggregate industry distribution of home mortgage loans to those borrowers.

***Small Loans to Businesses***

Refer to Table R in the “MMSA” 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.

The borrower distribution of small loans to businesses is excellent. The proportion of bank loans in 2023 was near the percentage of businesses and exceeded the aggregate industry distribution of small loans to businesses.

***Small Loans to Farms***

Refer to Table T in the “MMSA” 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 farms.

The borrower distribution of small loans to farms is excellent. The proportion of bank loans in 2023 exceeded the percentage of farms with revenues under \$1.0 million.

**Community Development Lending**

The bank has made a low level of CD loans. CD lending had a negative effect on the Lending Test conclusion in the state the MMSA.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank’s level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank originated one CD loan totaling \$400,000 to a non-profit neighborhood development corporation to complete critical home repairs on 45 affordable housing units.

**Product Innovation and Flexibility**

The bank makes limited use of innovative and/or flexible lending practices to serve the credit needs of the AA. The bank’s lending products provided flexibility for affordable housing and small businesses. FNB supported affordable housing through participation in home mortgage programs, including those with down payment and closing cost assistance, flexible underwriting, and no mortgage insurance requirements. FNB originated 37 flexible or innovative home mortgage loans, totaling \$3.5 million. This included 21 Affordable Mortgage loans, 13 Home Possible loans, and three HELP program loans. For a description of these products see the “Innovative and Flexible Product” section of the Overall Description of Bank.

**INVESTMENT TEST**

The bank’s performance under the Investment Test in the Youngstown MMSA is rated Needs to Improve.

Based on a full-scope review, the bank’s performance in the Youngstown MMSA is poor.

The bank has a poor level of qualified CD investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits poor responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

**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)
<b>Full Review</b>										
Youngstown MMSA	0	0	18	54	18	100.0	54	100.0	0	0
Statewide	0	0	0	0	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 bank's financial reporting system

FNB displayed poor responsiveness to the CD needs of the AA. The bank made 18 qualified donations totaling \$53,770.

**SERVICE TEST**

The bank's performance under the Service Test in Youngstown MMSA is rated High Satisfactory.

**Conclusions for Areas Receiving a Full-Scope Review**

Based on a full-scope review, the bank's performance in the Youngstown MMSA is good.

**Retail Banking Services**

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Youngstown MMSA	100.0	22	100.0	0.0	13.7	45.4	40.9	5.7	17.8	49.7	26.1

The AA has 14 low-income CTs and 37 moderate-income CTs. The bank has 22 branches in the AA. There are no branches located in low-income CTs and three branches located in moderate-income CTs. The percentage of branches in moderate-income CTs is near to the percentage of the population in those CTs. The bank did not open or close any branches in the Youngstown MMSA during 2023.

The bank supplements its traditional service delivery methods with alternative retail delivery systems,

such as deposit-taking ATMs, online banking, and mobile banking. The bank operates 25 deposit-taking ATMs in the AA, three of which are in moderate-income CTs. These include 19 ATMs with deposit imaging and six with interactive teller capabilities.

Services, including where business hours, do not vary in a way that inconveniences its AA(s), particularly low- and moderate-income geographies and/or individuals.

### **Community Development Services**

The bank provides a relatively high level of CD services. In total, 54 employees provided community development services to over 20 organizations totaling 363 hours during the evaluation period. The bank's CD service hours demonstrated complexity and leadership with the bank providing board services and other leadership roles in various CD service organizations. Bank employees provided 164 hours on boards or in leadership roles. The bank's CD services were primarily responsive to community services in the AA. The following are examples of CD service hours:

- Two employees provided 15 hours of financial expertise as a board member for a local non-profit organization that works to transform vulnerable, undervalued, and transitional neighborhoods into healthy neighborhoods of choice.
- One employee provided 18 hours of financial expertise in leadership roles for an organization that provides employment opportunities through business creation, expansion, and retention in collaboration with other regional organizations.
- Employees supported an organization that provides community-based and community-led solutions for childcare, education, health, or social services for LMI individuals by providing 45 hours of financial expertise as a board, finance, and executive committee members.

## State Rating

### State of Ohio

**CRA rating for the State of Ohio:** Satisfactory

**The Lending Test is rated:** High Satisfactory

**The Investment Test is rated:** Needs to Improve

**The Service Test is rated:** Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs.
- The bank exhibits an adequate geographic distribution of loans.
- The bank exhibits a good distribution of loans among individuals of different income levels and business of different sizes.
- Service delivery systems are reasonably accessible to geographies and individuals of different income levels.
- The bank provides an adequate level of CD services.

### Description of Bank's Operations in Ohio

FNB delineated six AAs in the state of Ohio (Akron MSA, Canton MSA, Cleveland MSA, Columbiana AA, Wayne AA, and the Youngstown MSA). The AAs meet the requirement of the regulation and do not arbitrarily exclude LMI CTs. Refer to appendix A for the list of counties reviewed for each AA.

The bank's operations in Ohio comprise 81.8 percent of total bank deposits and 73.0 percent of total bank branches. FNB's assessment areas in the Canton, Cleveland, and Youngstown MSAs and the Wayne AA received full-scope reviews. The components of the full scope AAs are discussed below.

#### Canton MSA

The Canton MSA consists of Stark County, OH. The 2020 U.S. Census changes affected the AA. Based on 2015 ACS data, in 2021 the AA contained 86 CTs and included 9 low-income CTs, 11 moderate-income CTs, 52 middle-income CTs, and 13 upper-income CTs. One CTs had no income designation. Beginning in 2022, the AA included 90 CTs with 8 low-income CTs, 17 moderate-income CTs, 42 middle-income CTs, and 23 upper-income CTs.

As of December 31, 2023, the bank had \$155 million in deposits in the MSA, representing 3.9 percent of the bank's total deposits. During the evaluation period, the bank made \$149.9 million or 14.3 percent of its total dollar volume of CRA reportable loans within the AA.

The bank operates four full-service branches and eight deposit taking ATMs within this AA. According to June 30, 2023, FDIC Summary of Deposit report, the bank had \$154.2 million in deposits in the Canton MSA. There were 16 FDIC-insured banks operating 90 branches in the AA. The bank ranked 11th in

deposit market share with 1.6 percent. The bank's deposit market share ranking was in the top 68.8 percent of all deposit taking banks in the AA. The five top competitors for deposits include The Huntington National Bank, J.P. Morgan Chase, N.A., First Commonwealth Bank, Keybank, N.A., and Citizens Bank, N.A. which hold a combined 80.9 percent market share.

Most non-farm businesses in the AA are small as measured by the number of employees and gross revenues. According to 2023 D&B data, 90.0 percent of businesses located in the AA have less than \$1.0 million in gross annual revenues and 62.5 percent of businesses reported employing fewer than five employees. Only 1.2 percent of businesses are headquartered in the AA, while 93.2 percent operate from a single location.

According to Moody's Analytics, the Canton MSA economy is struggling to improve and the labor market is lagging both state and national trends. The MSA has a limited talent pool, impacting local firms, and population rates continues to decline. Area strengths included below average business and living costs and high housing affordability. Economic challenges include population decline, low educational attainment, and lack of high-paying jobs outside of healthcare. Aultman Hospital is the primary employer in the MSA. Other top employers include Timken Steel, Mercy Medical Center, Freshmark Inc., and Diebold Inc.

Employment levels in the MSA improved from 2021 through 2023. According to the U.S. Bureau of Labor Statistics, the unemployment rate in the MSA was 6.9 percent in January 2021 which was in line with the state of Ohio unemployment of 6.7 percent. The unemployment rate dropped to 3.3 percent by December 2023, similar to the state rate of 3.1 percent. The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty. According to the 2020 U.S. Census, 9.5 percent of families in the Canton MSA had income below the federal poverty line. Additionally, the median housing value of owner-occupied housing units for the Canton MSA was \$117,788 in 2021 and \$132,480 in 2022-2023, reflecting a 12.5 percent increase in values.

Examiners utilized two community contacts in this AA, including an organization that provides housing and supportive services and another organization that provides several social services including job training. One contact commented on the need for additional capitalization to expand and more bankers on its loan review committee. The contact also indicated the need for support for general operating, financial literacy, and workforce development program. The other contact indicated the need for FHLB application sponsorship, grants for outreach and workforce development and general operating support.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Canton MSA 2021</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	86	10.5	12.8	60.5	15.1	1.2
Population by Geography	374,979	6.8	11.5	63.1	18.3	0.3
Housing Units by Geography	165,462	7.4	12.3	62.9	16.8	0.5
Owner-Occupied Units by Geography	103,621	3.7	8.9	67.3	20.1	0.0
Occupied Rental Units by Geography	46,764	12.9	18.2	55.6	12.0	1.3
Vacant Units by Geography	15,077	15.8	17.9	55.6	9.1	1.6
Businesses by Geography	23,459	5.4	7.3	63.4	21.3	2.6
Farms by Geography	820	1.7	2.3	76.1	19.6	0.2
Family Distribution by Income Level	98,810	19.5	18.7	21.8	40.0	0.0
Household Distribution by Income Level	150,385	23.8	16.4	18.3	41.5	0.0
Median Family Income MSA - 15940 Canton-Massillon, OH MSA		\$59,302	Median Housing Value			\$117,788
			Median Gross Rent			\$663
			Families Below Poverty Level			10.8%

*Source: 2015 ACS and 2021 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.*

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Canton MSA 2022-2023</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	90	8.9	18.9	46.7	25.6	0.0
Population by Geography	374,853	6.7	14.7	49.6	29.0	0.0
Housing Units by Geography	166,995	7.2	16.3	49.9	26.5	0.0
Owner-Occupied Units by Geography	105,096	3.5	11.1	52.9	32.5	0.0
Occupied Rental Units by Geography	49,226	13.1	24.7	44.9	17.3	0.0
Vacant Units by Geography	12,673	15.7	27.0	44.6	12.7	0.0
Businesses by Geography	43,268	5.2	14.2	49.9	30.7	0.0
Farms by Geography	1,369	2.8	7.2	56.0	34.0	0.0
Family Distribution by Income Level	98,253	19.5	18.6	21.4	40.4	0.0
Household Distribution by Income Level	154,322	23.7	16.2	18.3	41.8	0.0
Median Family Income MSA - 15940 Canton-Massillon, OH MSA		\$70,028	Median Housing Value			\$132,480
			Median Gross Rent			\$737
			Families Below Poverty Level			9.5%

*Source: 2020 U.S. Census and 2023 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.*

Cleveland MSA

The Cleveland MSA consists of Medina, Cuyahoga, Lake, and Geauga, OH counties. Refer to appendix A for the list of counties reviewed. The 2020 U.S. Census changes affected the AA. Based on 2015 ACS data, in 2021 the AA contained 564 CTs and included 107 low-income CTs, 129 moderate-income CTs, 175 middle-income CTs, and 142 upper-income CTs. 11 CTs had no income designation. Beginning in 2022, the AA included 551 CTs with 80 low-income CTs, 117 moderate-income CTs, 174 middle-income CTs, and 156 upper-income CTs. 24 CTs had no income designation.

As of December 31, 2023, the bank had \$170 million in deposits in the MSA, representing 4.3 percent of the bank's total deposits. During the evaluation period, the bank made \$140.1 million or 13.4 percent of its total dollar volume of CRA reportable loans within the AA.

The bank operates four full-service branches and four deposit taking ATMs within this AA. According to June 30, 2023, FDIC Summary of Deposit report, the bank had \$214.8 million in deposits in the Cleveland MSA. There were 32 FDIC-insured banks operating 460 branches in the AA. The bank ranked 17<sup>th</sup> in deposit market share with 0.2 percent. The bank's deposit market share ranking was in the top 53.1 percent of all deposit taking banks in the AA. The five top competitors for deposits include Keybank N.A., The Huntington National Bank, Citizens Bank N.A., J.P. Morgan Chase, and Third Federal S&L Assoc. of Cleveland, which hold a combined 80.3 percent market share.

Most non-farm businesses in the AA are small as measured by the number of employees and gross revenues. According to 2023 D&B data, 92.0 percent of businesses located in the AA have less than \$1.0 million in gross annual revenues and 59.6 percent of businesses reported employing fewer than five employees. Only 1.1 percent of businesses are headquartered in the AA, while 94.9 percent operate from a single location.

According to Moody's Analytics, the Cleveland economy is improving but at a much slower pace than Columbus and Cincinnati. The unemployment rate is at its lowest in more than two decades, and the housing market is performing relatively well with single-family house prices are rising. Area strengths included manufacturing infrastructure, specialized factory labor, and clinical and research healthcare banks. Economic challenges include continued outward migration and below average concentrations of young workers. Cleveland Clinic Foundation is the primary employer in the MSA. Other top employers include University Hospitals, U.S. Office of Personnel Management, Minute Men Cos., and Group Management Services Inc.

Employment levels in the MSA improved from 2021 through 2023. According to the U.S. Bureau of Labor Statistics, the unemployment rate in Medina County was 5.2 percent, Lake County was 6.2 percent, Geauga County was 5.1 percent in January 2021 which all were lower than the state of Ohio unemployment of 6.7 percent, except for Cuyahoga County with an unemployment rate of 7.7 percent. The unemployment rates dropped to 2.5 percent in Medina County, 2.9 percent in Lake County, 2.7 percent in Geauga County, and 3.2 percent in Cuyahoga County by December 2023 which all mirrored the state rate of 3.1 percent. The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty. According to the 2020 U.S. Census, 10.0 percent of families in the Cleveland MSA had income below the federal poverty line. Additionally, the median housing value of owner-occupied housing units for the Cleveland MSA was \$138,468 in 2021 and \$154,960 in 2022-2023, reflecting a 11.9 percent increase in values.

Examiners conducted two community contacts in the AA during the evaluation period, which included a nonprofit organization focused on neighborhood revitalization in low- and moderate-income areas, and a collaborative meeting of various community development agencies. Community contacts indicated that the following needs within the bank's AA are home purchase and improvement loans in LMI areas, affordable housing including rental units, flexible and/or gap financing and funding low dollar mortgage loans, small business lending to access start-up and working capital needs, and training and technical assistance to small businesses.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Cleveland MSA 2021</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	564	19.0	22.9	31.0	25.2	2.0
Population by Geography	1,761,331	12.2	20.3	33.5	33.5	0.5
Housing Units by Geography	827,857	14.4	22.6	32.7	29.5	0.7
Owner-Occupied Units by Geography	469,390	6.3	16.4	37.0	40.1	0.2
Occupied Rental Units by Geography	260,920	22.8	30.9	29.2	15.8	1.4
Vacant Units by Geography	97,547	31.1	30.7	21.5	15.3	1.4
Businesses by Geography	146,191	8.6	17.0	31.9	41.5	1.1
Farms by Geography	3,365	4.3	12.7	37.0	45.8	0.2
Family Distribution by Income Level	441,438	23.0	16.5	19.0	41.5	0.0
Household Distribution by Income Level	730,310	26.4	15.4	16.3	41.9	0.0
Median Family Income MSA - 17460 Cleveland-Elyria, OH MSA		\$65,821	Median Housing Value			\$138,468
			Median Gross Rent			\$758
			Families Below Poverty Level			11.7%
<i>Source: 2015 ACS and 2021 D&amp;B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Cleveland MSA 2022-2023</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	551	14.5	21.2	31.6	28.3	4.4
Population by Geography	1,775,287	10.1	18.9	34.2	35.2	1.6
Housing Units by Geography	831,225	12.6	21.2	32.9	31.1	2.3
Owner-Occupied Units by Geography	474,985	5.9	15.5	37.7	39.9	1.1
Occupied Rental Units by Geography	274,478	20.3	29.1	27.6	19.3	3.7
Vacant Units by Geography	81,762	25.5	27.6	22.7	20.0	4.3
Businesses by Geography	320,809	9.4	16.6	26.5	45.6	1.9
Farms by Geography	6,230	6.5	15.2	32.4	45.2	0.7
Family Distribution by Income Level	436,869	22.5	17.0	19.2	41.3	0.0
Household Distribution by Income Level	749,463	25.3	15.8	16.7	42.2	0.0
Median Family Income MSA - 17460 Cleveland-Elyria, OH MSA		\$76,766	Median Housing Value			\$154,960
			Median Gross Rent			\$857
			Families Below Poverty Level			10.0%
<i>Source: 2020 U.S. Census and 2023 D&amp;B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

### Wayne AA

The Wayne AA consists of Wayne and Holmes counties in Ohio. Refer to appendix A for the list of counties reviewed. The 2020 U.S. Census changes affected the AA. Based on 2015 ACS data, in 2021 the AA contained 40 CTs and included no low-income CTs, four moderate-income CTs, 26 middle-income CTs, and nine upper-income CTs. One CT had no income designation. Beginning in 2022, the AA included 42 CTs and included no low-income CTs, three moderate-income CTs, 30 middle-income CTs, and nine upper-income CTs.

As of December 31, 2023, the bank had \$571.9 million in deposits in the AA, representing 14.5 percent of the bank's total deposits. During the evaluation period, the bank made \$203.3 million or 19.5 percent of its total dollar volume of CRA reportable loans within the AA.

The bank operates ten full-service branches and ten deposit taking ATMs within this AA. According to June 30, 2023, FDIC Summary of Deposit report, the bank had \$567.2 million in deposits in the Wayne AA. There were 16 FDIC-insured banks operating 62 branches in the AA. The bank ranked fourth in deposit market share with 13.3 percent. The bank's deposit market share ranking was in the top 25.0 percent of all deposit taking banks in the AA. The other top five competitors for deposits are The Commercial and Savings Bank of Millersburg, Ohio, PNC Bank, N.A., The Killbuck Savings Bank Company, and Wayne Savings Community Bank, which hold a combined 58.3 percent market share.

Most non-farm businesses in the AA are small as measured by the number of employees and gross revenues. According to 2023 D&B data, 92.4 percent of businesses located in the AA have less than \$1.0 million in gross annual revenues and 63.8 percent of businesses reported employing fewer than five

employees. Only 1.4 percent of businesses are headquartered in the AA, while 93.6 percent operate from a single location.

Employment levels in the AA improved from 2021 through 2023. According to the U.S. Bureau of Labor Statistics, the unemployment rates in Wayne County and Holmes County were 4.9 percent and 3.5 percent, respectively, in January 2021, and lower than the state of Ohio unemployment of 6.7 percent. The unemployment rate dropped to 2.3 percent and 2.1 percent in Wayne County and Holmes County, respectively, by December 2023 and remained lower than the state rate of 3.1 percent.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty. According to the 2020 U.S. Census, 6.9 percent of families in the Wayne AA had income below the federal poverty line. Examiners evaluated housing affordability within the AA. Based on the tables below, low-income families earned less than \$2,779 per month, and moderate-income families earned less than \$4,446 per month. The maximum low- and moderate-income annual income calculations are based on 50.0 percent and 80.0 percent of the FFIEC adjusted median family income for the AA. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30.0 percent of the applicant's income. For the 2023 evaluation period, the calculated maximum affordable monthly mortgage payment was \$834 for a low-income borrower and \$1,334 for a moderate-income borrower. Assuming a 30-year mortgage with a 6.0 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$1,043. Based on these calculations, low-income borrowers would be challenged to qualify for a mortgage loan in the AA.

Examiners utilized one community contact in this AA. The contact is an affordable housing agency serving Wayne County. The contact identified affordable housing, food, and mental health services as Wayne County community needs. The contact also cited transportation and support for and communication with senior citizens as major community needs. Additionally, the contact noted mental health and substance abuse as issues encountered by Wayne County residents. Finally, the contact mentioned lacking access to living wage jobs, generational poverty, fixed income limitations, and the opioid epidemic as impacts to Wayne County, low-income families.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Wayne 2021</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	40	0.0	10.0	65.0	22.5	2.5
Population by Geography	158,807	0.0	8.0	73.0	18.4	0.7
Housing Units by Geography	59,546	0.0	8.8	70.8	20.3	0.2
Owner-Occupied Units by Geography	41,016	0.0	5.9	72.1	21.9	0.1
Occupied Rental Units by Geography	14,579	0.0	15.3	68.6	15.9	0.3
Vacant Units by Geography	3,951	0.0	14.9	64.6	20.0	0.6
Businesses by Geography	9,815	0.0	8.1	74.2	17.6	0.1
Farms by Geography	883	0.0	3.3	71.5	25.3	0.0
Family Distribution by Income Level	40,597	15.7	19.1	22.0	43.2	0.0
Household Distribution by Income Level	55,595	18.4	15.3	19.6	46.7	0.0
Median Family Income Non-MSAs - OH		\$55,785	Median Housing Value			\$142,803
			Median Gross Rent			\$637
			Families Below Poverty Level			9.7%
<i>Source: 2015 ACS and 2021 D&amp;B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Wayne 2022-2023</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	42	0.0	7.1	71.4	21.4	0.0
Population by Geography	161,117	0.0	5.1	74.6	20.3	0.0
Housing Units by Geography	60,366	0.0	5.8	75.6	18.6	0.0
Owner-Occupied Units by Geography	42,519	0.0	4.1	74.7	21.2	0.0
Occupied Rental Units by Geography	14,070	0.0	10.2	77.9	11.8	0.0
Vacant Units by Geography	3,777	0.0	8.2	77.0	14.7	0.0
Businesses by Geography	18,231	0.0	4.3	76.4	19.3	0.0
Farms by Geography	1,359	0.0	2.6	76.2	21.3	0.0
Family Distribution by Income Level	40,572	14.5	17.1	24.2	44.2	0.0
Household Distribution by Income Level	56,589	18.4	14.2	19.0	48.4	0.0
Median Family Income Non-MSAs - OH		\$66,684	Median Housing Value			\$174,149
			Median Gross Rent			\$728
			Families Below Poverty Level			6.9%
<i>Source: 2020 U.S. Census and 2023 D&amp;B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Youngstown MSA

The Youngstown MSA consists of Mahoning and Trumbull counties in Ohio. The 2020 U.S. Census changes affected the AA. Based on 2015 ACS data, in 2021 the AA contained 125 CTs and included 20 low-income CTs, 26 moderate-income CTs, 53 middle-income CTs, and 26 upper-income CTs. Beginning in 2022, the AA included 129 CTs with 12 low-income CTs, 34 moderate-income CTs, 59 middle-income CTs, and 22 upper-income CTs. Two CTs had no income designation.

As of December 31, 2023, the bank had \$2.0 billion in deposits in the MSA, representing 50.4 percent of the bank's total deposits. During the evaluation period, the bank made \$287.3 million or 27.5 percent of its total dollar volume of CRA reportable loans within the AA.

The bank operates 20 full-service branches and 25 deposit taking ATMs within this AA. According to the June 30, 2022, FDIC deposit-market share report, there were 11 FDIC-insured banks operating 91 branches in the AA. The bank ranked second in deposit market share with 21.7 percent. The bank's deposit market share ranking was in the top 18.2 percent of all deposit taking banks in the AA. The other four top competitors for deposits include The Huntington National Bank, Premier Bank, J.P. Morgan Chase Bank N.A., and PNC Bank, N.A. which hold a combined 67.8 percent market share.

Most non-farm businesses in the AA are small as measured by the number of employees and gross revenues. According to 2022 D&B data, 86.0 percent of businesses located in the AA have less than \$1.0 million in gross annual revenues and 58.5 percent of businesses reported employing fewer than five employees. Only 1.4 percent of businesses are headquartered in the AA, while 91.6 percent operate from a single location.

According to Moody's Analytics, the Youngstown economy is at risk with an underperforming labor market and employment trending downward. Industries facing declines include professional/business services, education, and government industries. The labor force has increased, and combined with a lack of job growth has pushed the unemployment rate up slightly. There is minimal residential construction occurring, leading to housing price increases. Area strengths included a large healthcare industry, and highly affordable and undervalued housing. Economic challenges include a heavy reliance on manufacturing, and declining population constraining long term growth of basic services. Mercy Medical Center is the primary employer in the MMSA. Other top employers include Youngstown Air Reserve Station, Windsor House, Steward ValleyCare Health System, and Youngstown State University.

Employment levels in the MSA improved from 2021 through 2022. According to the U.S. Bureau of Labor Statistics, the unemployment rate in Mahoning County, and Trumbull County was 8.6 percent and 8.8 percent, respectively, in January 2021 which was higher than the state of Ohio unemployment of 6.7 percent. The unemployment rate dropped to 4.2 percent in Mahoning County and 4.4 percent in Trumbull County by December 2022 which was still higher than the state rate of 3.4 percent.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty. According to the 2020 U.S. Census, 13.3 percent of families in the Youngstown MSA had income below the federal poverty line.

Examiners utilized two community contacts in this AA, including a local nonprofit organization that focuses on mobilizing and utilizing resources to increase the quality of life for LMI residents and

development organization that works to transform neighborhoods into meaningful places where people invest time, money, and energy. One contact commented on the need for emergency assistance, housing utility and food assistance. The contact noted a need for financial education, credit counseling, and one on one coaching. A contact commented on the need to construction financing and lines of credit as well as general operating support and funding for their home ownership counseling and financial education.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Youngstown MSA 2021</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	125	16.0	20.8	42.4	20.8	0.0
Population by Geography	440,923	9.7	16.5	46.4	27.4	0.0
Housing Units by Geography	207,134	10.3	17.4	46.3	26.0	0.0
Owner-Occupied Units by Geography	128,241	5.7	13.6	49.5	31.2	0.0
Occupied Rental Units by Geography	56,377	15.7	23.9	42.3	18.1	0.0
Vacant Units by Geography	22,516	23.3	22.9	37.9	16.0	0.0
Businesses by Geography	26,708	8.7	13.3	39.8	38.2	0.0
Farms by Geography	981	2.9	7.6	51.2	38.3	0.0
Family Distribution by Income Level	116,328	21.2	18.0	20.5	40.3	0.0
Household Distribution by Income Level	184,618	24.6	16.0	17.9	41.6	0.0
Median Family Income MSA - 49660 Youngstown-Warren-Boardman, OH-PA MSA		\$55,174	Median Housing Value			\$96,456
			Median Gross Rent			\$632
			Families Below Poverty Level			13.5%
<i>Source: 2015 ACS and 2021 D&amp;B Data; Due to rounding, totals may not equal 100.0%. (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Youngtown MSA 2022</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	129	9.3	26.4	45.7	17.1	1.6
Population by Geography	430,591	5.9	20.2	49.7	23.3	0.9
Housing Units by Geography	206,963	6.8	21.6	49.6	21.2	0.8
Owner-Occupied Units by Geography	129,265	3.7	17.7	53.2	24.9	0.5
Occupied Rental Units by Geography	55,521	10.8	28.4	44.7	14.5	1.6
Vacant Units by Geography	22,177	15.0	27.6	41.0	15.9	0.4
Businesses by Geography	43,171	6.0	18.6	42.3	32.7	0.5
Farms by Geography	1,366	2.1	14.1	59.9	23.6	0.2
Family Distribution by Income Level	111,964	22.6	16.9	21.4	39.1	0.0
Household Distribution by Income Level	184,786	24.8	16.4	17.6	41.2	0.0
Median Family Income MSA - 49660 Youngstown-Warren-Boardman, OH-PA MSA		\$63,220	Median Housing Value			\$106,008
			Median Gross Rent			\$688
			Families Below Poverty Level			13.3%
<i>Source: 2020 U.S. Census and 2022 D&amp;B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Scope of Evaluation in Ohio

The OCC conducted a full-scope review of the Canton, Cleveland, and Youngstown MSAs as well as the Wayne AA. The Youngstown MSA evaluation period is 2021 through 2022. The Youngstown MSA moved into the Youngstown MMSA for 2023 data due to census changes. When evaluating full-scope performance, examiners placed more weight on performance in the Youngstown MSA due to it having the largest percentage of statewide deposits, loans, and branches. Examiners gave higher weight to the Wayne AA, Canton CSA, and Cleveland MSAs, respectively, based on lending activity.

Examiners gave more weight to the performance of home mortgage loans as compared to small business or farm loans. Examiners gave slightly more weight to performance of home mortgage loans due to fact they comprised the majority of CRA reportable loans in Ohio. Based on the total number of reported loans, excluding CD loans, home mortgage loans represented 68.0 percent of CRA reportable loan originations and purchases during the evaluation period in Ohio. Examiners did not consider consumer or multi-family in this evaluation, as these lending products did not constitute a substantial majority of the bank's business.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO

### LENDING TEST

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

### Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Canton and Youngstown MSAs and the Wayne AA is good. Performance in the Cleveland MSA is poor.

## Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
<b>Full-Scope</b>							
Cleveland MSA	326	384	91	2	803	11.5	5.3
Canton MSA	523	331	125	1	980	14.1	4.8
Wayne	950	480	387	0	1,817	26.1	17.7
Youngstown MSA	1,346	726	72	3	2,147	30.8	61.6
<b>Limited-Scope</b>							
Columbiana	471	288	51	0	810	11.6	7.8
Akron MSA	188	148	74	1	411	5.9	2.8
<b>TOTAL</b>	<b>3,804</b>	<b>2,357</b>	<b>800</b>	<b>7</b>	<b>6,968</b>	<b>100.0</b>	<b>100.0</b>

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans (000) *							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State*	% State Deposits
<b>Full-Scope</b>							
Cleveland MSA	\$78,955	\$61,136	\$3,223	\$2,600	\$145,914	14.8	5.3
Canton MSA	\$96,596	\$52,806	\$9,786	\$1,300	\$160,488	16.4	4.8
Wayne	\$160,556	\$42,784	\$37,704	0	\$241,044	24.6	17.7
Youngstown MSA	\$193,439	\$93,892	\$5,139	\$2,986	\$295,456	30.1	61.6
<b>Limited-Scope</b>							
Columbiana	\$52,623	\$19,344	\$2,239	0	\$74,206	7.6	7.8
Akron MSA	\$38,415	\$22,711	\$1,943	\$945	\$64,014	6.5	2.8
<b>TOTAL</b>	<b>\$620,584</b>	<b>\$292,673</b>	<b>\$60,034</b>	<b>\$7,831</b>	<b>\$981,122</b>	<b>100.0</b>	<b>100.0</b>

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

### Canton MSA

Lending levels reflect excellent responsiveness to AA credit needs.

According to 2023 Peer Mortgage Data, the bank had a 1.3 percent market share of home mortgage loan originations in the AA. The bank's market share of home mortgage loan originations was near the bank's deposit market share. The bank's market share of home mortgage originations ranked 18<sup>th</sup> out of 295 lenders with a 1.3 percent market share. The bank's ranking of home mortgage loan originations was in the top 6.1 percent of all lenders in the AA. The bank's market share ranking of home mortgage loan originations was stronger than the deposit market share ranking.

According to 2022 Peer Small Business data, the bank had a 1.4 percent market share of small business loan originations by number of loans. The market share of small business loan originations ranked 13<sup>th</sup> out of 87 small business lenders and was in the top 14.9 percent of all small business lenders in the AA.

The bank's market share of small business by loan dollar volume was 7.6 percent and ranked fifth out of 87 small business lenders. The bank's market share ranking of small business loan volume ranked in the top 5.7 percent of all small business lenders in the AA.

According to 2022 Peer Small Farm data, the bank had a 39.8 percent market share of small farm loan originations by number of loans. The market share of small farm loan originations ranked first out of 13 lenders. The bank's market share of small farm by loan dollar volume was 65.0 percent which also ranked first. The bank's market share ranking of farm loan originations was stronger than the deposit market share ranking.

#### Cleveland MSA

Lending levels reflect excellent responsiveness to AA credit needs.

According to 2023 Peer Mortgage Data, the bank had a 0.2 percent market share of home mortgage loan originations in the AA. The bank market share of home mortgage originations ranked 70th out of 520 lenders. The bank ranking of home mortgage loan originations was in the top 13.5 percent of all lenders in the AA.

According to 2023 Peer Small Business data, the bank had a 0.3 percent market share of small business loan originations. The bank's market share of small business loan originations exceeded deposit market share. The bank's market share of small business loan originations ranked 25<sup>th</sup> out of 150 small business lenders. The bank's market share ranking was in the top 16.7 percent of all small business lenders in the AA. The bank's market share of small business loan dollar volume was 1.4 percent and ranked 18<sup>th</sup> out of 150 small business lenders. The bank's market share ranking of small business loan volume ranked in the top 12.0 percent of all small business lenders in the AA.

According to 2022 Peer Small Farm data, the bank had a 14.9 percent market share of small farm loan originations by number of loans. The market share of small farm loan originations ranked second out of 14 lenders. The bank's market share of small farm by loan dollar volume was 21.1 percent which also ranked second. The bank's market share ranking of farm loan originations was stronger than the deposit market share ranking.

#### Wayne AA

Lending levels reflect good responsiveness to AA credit needs.

According to 2023 Peer Mortgage Data, the bank had an 8.7 percent market share of home mortgage loan originations in the AA. The bank market share of home mortgage originations ranked third out of 177 lenders and was in the top 1.7 percent of all lenders in the AA.

According to 2023 Peer Small Business data, the bank had a 3.3 percent market share of small business loan originations by volume. The bank's market share of small business loan originations ranked seventh out of 63 small business lenders and the market share ranking was in the top 11.1 percent of all small business lenders in the AA. The bank's market share of small business by loan dollar volume was 10.3 percent and ranked second out of 63 small business lenders. The bank's market share ranking of small business loan volume ranked in the top 3.2 percent of all small business lenders in the AA.

According to 2022 Peer Small Farm data, the bank had a 45.1 percent market share of small farm loan originations by number of loans. The market share of small farm loan originations ranked first out of 15 lenders. The bank's market share of small farm by loan dollar volume was 78.6 percent which also ranked first. The bank's market share ranking of farm loan originations was stronger than the deposit market share ranking.

### Youngstown MSA

Lending levels reflect excellent responsiveness to AA credit needs.

According to 2022 Peer Mortgage Data, the bank had a 4.4 percent market share of home mortgage loan originations in the AA. The bank's market share of home mortgage originations ranked fifth out of 360 lenders. The bank ranking of home mortgage loan originations was in the top 1.4 percent of all lenders in the AA.

According to 2022 Peer Small Business data, the bank had a 3.0 percent market share of small business loan originations. The bank's market share of small business loan originations was weaker than its deposit market share. The bank's market share of small business loan originations ranked 10<sup>th</sup> out of 86 small business lenders. The bank's market share ranking was in the top 11.6 percent of all small business lenders in the AA. The bank's market share ranking of small business loans exceeded its deposit market share ranking. The bank's market share of small business loan dollar volume was 11.9 percent and ranked fourth out of 86 small business lenders. The bank's market share ranking of small business loan volume ranked in the top 4.7 percent of all small business lenders in the AA. The bank's market share of small business loan volume was stronger than its deposit market share ranking.

According to 2022 Peer Small Farm data, the bank had a 20.5 percent market share of small farm loan originations by number of loans. The market share of small farm loan originations ranked first out of 16 lenders. The bank's market share of small farm by loan dollar volume was 42.9 percent which also ranked first. The bank's market share ranking of farm loan originations was stronger than the deposit market share ranking.

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

The bank exhibits an adequate geographic distribution of loans in its AA(s).

### ***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 bank exhibits an adequate geographic distribution of home mortgage loans.

### Canton MSA

The geographic distribution of home mortgage loans is good.

During 2022 through 2023, the proportion of bank home mortgage loans in LMI CTs was near to the percentage of owner-occupied housing and the aggregate industry distribution of home mortgage loans.

In 2021, the proportion of bank home mortgage loans in low-income CTs was below the percentage of owner-occupied housing and equaled the aggregate industry distribution. The proportion of bank home mortgage loans in moderate-income CTs was well below both the percentage of owner-occupied housing and near to the aggregate industry distribution of home mortgage loans.

### Cleveland MSA

The geographic distribution of home mortgage loans is poor.

During 2022 through 2023, the proportion of bank home mortgage loans in low-income CTs was well below both the percentage of owner-occupied housing and the aggregate industry distribution of home mortgage loans. The proportion of bank home mortgage loans in moderate-income CTs was below both the percentage of owner-occupied housing and the aggregate industry distribution of home mortgage loans.

In 2021, the proportion of bank home mortgage loans in low-income CTs was below the percentage of owner-occupied housing and exceeded the aggregate industry distribution of home mortgage loans. The proportion of bank home mortgage loans in moderate-income CTs was well below both the percentage of owner-occupied housing and the aggregate industry distribution of home mortgage loans.

### Wayne AA

The geographic distribution of home mortgage loans is adequate. As the AA contained no low-income CTs during the evaluation period, conclusions are based upon performance in moderate-income CTs.

During 2022 through 2023, the proportion of bank home mortgage loans in moderate-income CTs exceeded the percentage of owner-occupied housing and was below the aggregate industry distribution of home mortgage loans. In 2021, the proportion of bank home mortgage loans in moderate-income CTs was below both the percentage of owner-occupied housing and the aggregate industry distribution of home mortgage loans.

### Youngstown MSA

The geographic distribution of home mortgage loans is adequate.

During 2022, the proportion of bank home mortgage loans in low-income CTs was below the percentage of owner-occupied housing and equaled the aggregate industry distribution of home mortgage loans. The proportion of bank home mortgage loans in moderate-income CTs was well below both the percentages of owner-occupied housing and the aggregate industry distribution of home mortgage loans.

In 2021, the proportion of bank home mortgage loans in low-income CTs was well below the percentage of owner-occupied housing and near to the aggregate industry distribution of home mortgage loans. The proportion of bank home mortgage loans in moderate-income CTs was well below the percentage of owner-occupied housing and below the aggregate industry distribution of home mortgage loans.

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

Refer to Table Q in the state of Ohio 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.

The bank exhibits an adequate geographic distribution of small loans to businesses.

Canton MSA

The geographic distribution of small loans to businesses is excellent.

During 2022 through 2023, the bank's proportion of small loans to businesses exceeded both the percentage of businesses and the aggregate industry distribution of small loans to businesses in low-income CTs. The bank's proportion of small loans to businesses was near to the percentage of businesses and exceeded the aggregate industry distribution of small loans to businesses in moderate-income CTs.

In 2021, the bank's proportion of small loans to businesses approximated both the percentage of businesses and the aggregate industry distribution of small loans to businesses in low-income CTs. The bank's proportion of small loans to businesses was near to the percentage of businesses and approximated the aggregate industry distribution of small loans to businesses in moderate-income CTs.

Cleveland MSA

The geographic distribution of small loans to businesses is adequate.

During 2022 through 2023, the bank's proportion of small loans to businesses was well below both the percentage of businesses and the aggregate industry distribution of small loans to businesses in low-income CTs. The bank's proportion of small loans to businesses was well below both the percentage of businesses and the aggregate industry distribution of small loans to businesses in moderate-income CTs.

In 2021, the bank's proportion of small loans to businesses approximated both the percentage of businesses and the aggregate industry distribution of small loans to businesses in low-income CTs and exceeded both in moderate-income CTs.

Wayne AA

The geographic distribution of small loans to businesses is excellent. As the AA contained no low-income CTs during the evaluation period, conclusions are based upon performance in moderate-income CTs.

During 2022 through 2023, the percentage of small loans to businesses in moderate-income CTs exceeded both the percentage of businesses located in those CTs and the aggregate percentage of all reporting lenders.

For 2021, the bank's proportion of small loans to businesses was below the percentage of businesses and approximated the aggregate industry distribution of small loans to businesses in moderate-income CTs.

Youngstown MSA

The geographic distribution of small loans to businesses is adequate.

In 2022, the bank's proportion of small loans to businesses was well below the percentage of businesses and below the aggregate industry distribution of small loans to businesses in low-income CTs. The bank's

proportion of small loans to businesses was below the percentage of businesses and was near to the aggregate industry distribution of small loans to businesses in moderate-income CTs.

During 2021, the bank's proportion of small loans to businesses was well below both the percentage of businesses and the aggregate industry distribution of small loans to businesses in low-income CTs. The bank's proportion of small loans to businesses was near the percentage of businesses and exceeded the aggregate industry distribution of small loans to businesses in moderate-income CTs.

### ***Small Loans to Farms***

Refer to Table S in the state of Ohio 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 farms.

The bank exhibits a poor geographic distribution of small loans to farms.

#### *Canton MSA*

The geographic distribution of small loans to farms is poor.

During 2022 through 2023, the bank did not originate any small loans to farms in low-income CTs. However, lending opportunities are limited as there are only 36 small farms in low-income CTs. The bank's proportion of small loans to farms was well below both the percentage of farms and the aggregate industry distribution of small loans to farms in moderate-income CTs.

In 2021, the bank did not originate any small loans to farms in low-income CTs. However lending opportunities are limited as there are only 12 small farms in low-income CTs. Additionally, aggregate lending reflected no farm loan originations in low-income CTs. The bank's proportion of small loans to farms approximated the percentage of farms and exceeded the aggregate industry distribution of small loans to farms in moderate-income CTs.

#### *Cleveland MSA*

The geographic distribution of small loans to businesses is poor.

During 2022 through 2023, the bank's proportion of small loans to farms was well below the percentage of farms and near to the aggregate industry distribution of small loans to farms in low-income CTs. The bank's proportion of small loans to farms was well below both the percentage of farms and the aggregate industry distribution of small loans to farms in moderate-income CTs.

In 2021, the bank did not originate any small loans to farms in low-income CTs. The bank's proportion of small loans to farms was well below the percentage of farms and exceeded the aggregate industry distribution of small loans to farms in moderate-income CTs.

#### *Wayne AA*

The geographic distribution of small loans to farms is poor. As the AA contained no low-income CTs during the evaluation period, conclusions are based upon performance in moderate-income CTs.

During 2022 through 2023, the bank's proportion of small loans to farms was well below both the percentage of farms and the aggregate industry distribution of small loans to farms in moderate-income CTs. Limited opportunities exist in the AA as there are only 34 small farms in moderate-income CTs.

In 2021, the bank's proportion of small loans to farms was well below the percentage of farms and exceeded the aggregate industry distribution of small loans to farms in moderate-income CTs. Limited opportunities exist in the AA as there are only 28 small farms in moderate-income CTs.

### Youngstown MSA

The geographic distribution of small loans to farms is poor.

The bank did not originate any small loans to farms located in low- income CTs during 2022. However, limited lending opportunities exist in the MSA as there are only 29 small farms in low-income CTs. Additionally, aggregate lending reflected no farm loan originations in low-income CTs. The bank's proportion of small loans to farms was well below the percentage of farms and exceeded the aggregate industry distribution of small loans to farms in moderate-income CTs.

During 2021, the bank did not originate any small loans to farms in low- or moderate-income CTs. However, limited lending opportunities exist in the MSA as there are only 26 small farms in low-income CTs and 74 small farms in moderate-income CTs.

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

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. Examiners reviewed summary reports, maps, and analyzed the bank's lending activity over the evaluation period to identify any gaps in the geographic distribution of loans and did not identify any unexplained, conspicuous gaps.

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

The bank exhibits a good distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the bank.

### ***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 bank exhibits a good distribution of home mortgage loans among individuals of different income levels.

### Canton MSA

The borrower distribution of home mortgage loans is good.

During 2022 through 2023, the proportion of the bank's loans to low-income borrowers was well below the percentage of low-income families and below the aggregate industry distribution of home mortgage loans to low-income borrowers. The proportion of the bank's home mortgage loans to moderate-income

borrowers exceeded the percentage of moderate-income families and was near to the aggregate industry distribution of home mortgage loans to moderate-income borrowers.

In 2021, the proportion of the bank's loans to low-income borrowers was well below the percentage of low-income families and below the aggregate industry distribution of home mortgage loans to low-income borrowers. The proportion of the bank's home mortgage loans to moderate-income borrowers was near to the percentage of moderate-income families and below the aggregate industry distribution of home mortgage loans to moderate-income borrowers.

#### Cleveland MSA

The borrower distribution of home mortgage loans is poor.

During 2022 through 2023, the proportion of the bank's loans to low-income borrowers was well below the percentage of low-income families and near to the aggregate industry distribution of home mortgage loans to low-income borrowers. The proportion of the bank's home mortgage loans to moderate-income borrowers was well below both the percentage of moderate-income families and the aggregate industry distribution of home mortgage loans to moderate-income borrowers.

In 2021, the proportion of the bank's loans to low-income borrowers was well below both the percentage of low-income families and the aggregate industry distribution of home mortgage loans to low-income borrowers. The proportion of the bank's home mortgage loans to moderate-income borrowers was near to both the percentage of moderate-income families and the aggregate industry distribution of home mortgage loans to moderate-income borrowers.

#### Wayne AA

The borrower distribution of home mortgage loans is excellent.

When determining the conclusions for borrower distribution of home mortgage loans, examiners considered the fact that home mortgages were potentially not affordable to low-income borrowers throughout the evaluation period. Therefore, examiners placed more emphasis on the comparison to the aggregate distribution of home mortgage loans to low-income borrowers.

During 2022 through 2023, the proportion of the bank's loans to low-income borrowers was well below the percentage of low-income families and near to the aggregate industry distribution of home mortgage loans to low-income borrowers. The proportion of the bank's home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate industry distribution of home mortgage loans to moderate-income borrowers.

In 2021, the proportion of the bank's loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate industry distribution of home mortgage loans to low-income borrowers. The proportion of the bank's home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate industry distribution of home mortgage loans to moderate-income borrowers.

#### Youngstown MSA

The borrower distribution of home mortgage loans is good.

When determining conclusions for borrower distribution of home mortgage loans, examiners considered the fact that home mortgages were potentially not affordable to low-income borrowers throughout the evaluation period. Therefore, examiners placed more emphasis on the comparison to the aggregate distribution of home mortgage loans to low-income borrowers.

During 2022, the proportion of the bank's loans to low-income borrowers was well below the percentage of low-income families and below the aggregate industry distribution of home mortgage loans to low-income borrowers. The proportion of the bank's home mortgage loans to moderate-income borrowers approximated the percentage of moderate-income families and was below aggregate industry distribution of home mortgage loans to moderate-income borrowers.

In 2021, the proportion of the bank's loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate industry distribution of home mortgage loans to low-income borrowers. The proportion of the bank's home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and was near to the aggregate industry distribution of home mortgage loans to moderate-income borrowers.

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

Refer to Table R in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The bank exhibits an adequate distribution of small business loans among businesses of different sizes.

#### *Canton MSA*

The distribution of loans to businesses of different sizes is adequate.

During 2022 through 2023, the proportion of bank loans to businesses with revenues of \$1.0 million or less was below the percentage of businesses and exceeded the aggregate industry distribution of small loans to businesses.

In 2021, the proportion of bank loans to businesses with revenues of \$1.0 million or less was well below the percentage of businesses and was near to the aggregate industry distribution of small loans to businesses.

#### *Cleveland MSA*

The distribution of loans to businesses of different sizes is adequate.

During 2022 through 2023, the proportion of bank loans to businesses with revenues of \$1.0 million or less was well below the percentage of businesses and exceeded the aggregate industry distribution of small loans to businesses.

In 2021, the proportion of bank loans to businesses with revenues of \$1.0 million or less was well below the percentage of businesses and below the aggregate industry distribution of small loans to businesses.

Wayne AA

The distribution of loans to businesses of different sizes is good.

During 2022 through 2023, the proportion of bank loans to businesses with revenues of \$1.0 million or less was near to the percentage of businesses and significantly exceeded the aggregate industry distribution of small loans to businesses.

In 2021, the proportion of bank loans to businesses with revenues of \$1.0 million or less was well below the percentage of businesses and the aggregate industry distribution of small loans to businesses.

Youngstown MSA

The distribution of loans to businesses of different sizes is adequate.

During 2022 through 2023, the proportion of bank loans to businesses with revenues of \$1.0 million or less was below the percentage of businesses and exceeded the aggregate industry distribution of small loans to businesses.

In 2021, the proportion of bank loans to businesses with revenues of \$1.0 million or less was well below both the percentage of businesses and the aggregate industry distribution of small loans to businesses.

***Small Loans to Farms***

Refer to Table T in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to farms.

The bank exhibits excellent distribution of small farms loans among farms of different sizes.

Canton MSA

The distribution of small loans to farms of different sizes is excellent.

During 2022 through 2023, the proportion of bank small loans to farms with revenues of \$1.0 million or less was near the percentage of farms and exceeded the aggregate industry distribution of small loans to farms.

In 2021, the proportion of bank small loans to farms with revenues of \$1.0 million or less was near to the percentage of farms and exceeded the aggregate industry distribution of small loans to farms.

Cleveland MSA

The distribution of small loans to farms of different sizes is excellent.

During 2022 through 2023, the proportion of bank small loans to farms with revenues of \$1.0 million or less was approximately the percentage of farms and exceeded the aggregate industry distribution of small loans to farms.

In 2021, the proportion of bank small loans to farms with revenues of \$1.0 million or exceeded both the percentage of farms and the aggregate industry distribution of small loans to farms.

Wayne AA

The distribution of small loans to farms of different sizes is excellent.

During 2022 through 2023, the proportion of bank small loans to farms with revenues of \$1.0 million or less was near to the percentage of farms and exceeded the aggregate industry distribution of small loans to farms.

In 2021, the proportion of bank small loans to farms with revenues of \$1.0 million or less was near to the percentage of farms and exceeded the aggregate industry distribution of small loans to farms.

Youngstown MSA

The distribution of small loans to farms of different sizes is excellent.

During 2022, the proportion of bank small loans to farms with revenues of \$1.0 million or less exceeded both the percentage of farms and the aggregate industry distribution of small loans to farms.

In 2021, the proportion of bank small loans to farms with revenues of \$1.0 million or less was near to the percentage of farms and exceeded the aggregate industry distribution of small loans to farms.

## **Community Development Lending**

The bank made an adequate level of CD loans. CD lending had a neutral effect on the Lending Test conclusion in the state of Ohio.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Canton MSA

The bank has made a relatively high level of CD loans. During the evaluation period, the bank originated one qualified PPP loan totaling \$1.3 million for payroll to a business whose employees are considered moderate-income based upon average annual salary. This equates to 8.3 percent of allocated tier 1 capital.

Cleveland MSA

The bank has made a relatively high level of CD loans. During the evaluation period, the bank originated two qualified CD loans totaling \$2.6 million, or 14.6 percent of allocated tier 1 capital. One \$1.3 million PPP loan was for payroll to a business whose employees are considered moderate-income based upon average annual salary. The other \$1.3 million was an SBA Certified Development Company 504 loan.

Wayne AA

The bank has made few, if any, CD loans. During the evaluation period, the bank did not originate any CD loans in the AA. The lack of CD lending was a result of limited opportunities to originate CD loans within the AA, the lack of LMI CTs, and competition from other financial banks for CD loans.

### Youngstown MSA

The bank has made an adequate level of CD loans. During the evaluation period, the bank originated three qualified CD loans totaling \$3.0 million, or 1.5 percent of allocated tier 1 capital. Two were PPP loans, totaling \$2.7 million, made to non-profit organizations in LMI CTs.

## **Product Innovation and Flexibility**

The bank makes extensive use of innovative and/or flexible lending practices to serve the credit needs of the AA. The bank's lending products provided flexibility for affordable housing and small businesses. FNB supported affordable housing through participation in home mortgage programs, including those with down payment and closing cost assistance, flexible underwriting, and no mortgage insurance requirements. FNB originated 73 flexible or innovative home mortgage loans, totaling approximately \$8.2 million. This included 26 Affordable Mortgage loans and 47 Home Possible loans. In response to the COVID-19 pandemic, the bank made 786 PPP loans totaling \$74.2 million in their AAs. The bank's PPP loans in LMI CTs by number accounted for 14.3 percent of the PPP originations. For a description of these products see the "Innovative and Flexible Product" section of the Overall Description of Bank.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited scope reviews, the bank's performance under the Lending Test in the Columbiana AA and Akron MSA is consistent with the bank's overall performance under the Lending Test in the full-scope area(s).

Refer to Tables O through R in the state of Ohio section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

The bank's performance under the Investment Test in Ohio is rated Needs to Improve.

## **Conclusions for Areas Receiving Full-Scope Reviews**

Based on full-scope reviews, the bank's performance in the Canton and Cleveland MSAs are good and excellent, respectively. The bank's performance in both the Wayne AA and Youngstown MSA was poor.

The bank has a poor level of qualified CD investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits poor responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
<b>Full Review</b>										
Canton MSA	1	1,250	18	35	19	16.0	1,285	3.6	0	0
Cleveland MSA	1	1,000	12	23	13	10.9	1,023	2.9	0	0
Wayne	0	0	20	47	20	16.8	47	0.1	0	0
Youngstown MSA	0	0	29	76	29	24.4	76	0.2	0	0
Statewide	15	19,175	5	13,500	20	16.8	32,675	92.6	14	13,173
<b>Limited Review</b>										
Akron MSA	0	0	9	157	9	7.6	157	0.5	0	0
Columbiana	0	0	9	19	9	7.6	19	0.1	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 bank'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. This table includes all CD investment, including prior period investments that remain outstanding as of our performance evaluation.

FNB made a total of 119 qualifying investments and donations, including 17 prior period investments, totaling \$35.3 million. This equates to 8.6 percent of total tier 1 capital as of December 31, 2021. The bank also has \$13.2 million in unfunded investment commitments.

### Statewide/Regional

FNB committed \$32.7 million of investments into statewide securities. This includes prior period investment of \$19.2 million which benefitted some of the bank's AAs. During the evaluation period, the bank funded four investments in Low-Income Housing Tax Credits (LIHTC), totaling \$12.5 million that benefitted their AAs. The investments in the LIHTCs helped create and preserve affordable housing units benefiting low- and moderate-income geographies or individuals in the state of Ohio. Additionally, the bank made one qualified Small Business Investment Company Fund (SBIC) investment for \$1.0 million. The bank also has \$13.2 million in unfunded commitments.

### Canton MSA

The bank exhibited good responsiveness to AA community investment needs when considering statewide or regional investments. During the evaluation period, the bank made 18 qualified donations totaling \$35,000. As noted above, FNB funded four qualified LIHTC investments, totaling \$12.5 million, in a broader, statewide region, which resulted in the allocation of \$296,000 for the creation of 40 affordable housing units in the AA. The bank's prior period LIHTC investments included four affordable housing projects within the AA. The bank also had a prior period purchase of a multi-family structured pass-through bond with a book balance of \$1.25 million, which is backed by Freddie Mac multi-family loans, with one located in the AA. This multi-family apartment provided affordable housing for low- and moderate-income individuals. Additionally, FNB's prior period investment in the Ohio Housing Authority bond also benefitted low- to moderate-income individuals within the AA.

### Cleveland MSA

The bank exhibited excellent responsiveness to AA community investment needs when considering statewide or regional investments. During the evaluation period, the bank made 12 qualified donations totaling \$23,000. As noted above, FNB funded four qualified LIHTC investments, totaling \$12.5 million, in a broader, statewide region, which resulted in the allocation of \$10.8 million for the creation of 637 affordable housing units in the AA. The bank's prior period LIHTC investments totaled 21 affordable housing projects within the AA. The bank also has two prior period SBIC investments and one SBA loan fund investment which benefitted the AA. Additionally, FNB's prior period municipal school bond investment, with a book value of \$1.0 million also benefitted low- to moderate-income individuals within the AA.

#### Wayne AA

The bank exhibited poor responsiveness to AA community investment needs when considering statewide or regional investments. During the evaluation period, the bank made 20 qualified donations totaling \$47,000. The bank does have one prior period qualified SBIC investment in a broader, statewide region, which benefitted the Wayne AA. Additionally, FNB's prior period investment in the Ohio Housing Authority bonds also benefitted low- to moderate-income individuals within the AA.

#### Youngstown MSA

The bank exhibited poor responsiveness to AA community investment needs when considering statewide or regional investments. During 2021 through 2022, the bank made 29 qualified donations totaling \$76,000. The bank's prior period LIHTC investments included six affordable housing projects within the AA. Additionally, FNB's prior period investment in the Ohio Housing Authority bond also benefitted low- to moderate-income individuals within the AA.

### **Conclusions for Areas Receiving a Limited-Scope Review**

Based on limited-scope reviews, the bank's performance under the Investment Test in the Akron MSA and Columbiana AA is consistent with the bank's overall performance under the Investment Test in the full-scope area(s).

### **SERVICE TEST**

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

### **Conclusions for Areas Receiving Full-Scope Reviews**

Based on full-scope reviews, the bank's performance in the Canton, Cleveland, and Youngstown MSAs is adequate. Performance in the Wayne AA is good.

### **Retail Banking Services**

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full-Scope</b>											
Canton MSA	4.8	4	8.5	0.0	25.0	75.0	0.0	6.7	14.7	49.6	29.0
Cleveland MSA	5.3	4	8.5	0.0	25.0	25.0	50.0	10.1	18.9	34.2	35.2
Wayne	17.7	10	21.3	0.0	10.0	80.0	10.0	0.0	5.1	74.6	20.3
Youngstown MSA	61.6	21	44.7	0.0	14.3	47.6	38.1	5.9	20.2	49.7	23.3
<b>Limited-Scope</b>											
Akron MSA	2.8	3	6.4	0.0	33.3	33.3	33.3	8.4	19.5	39.2	30.8
Columbiana	7.8	5	10.6	20.0	0.0	80.0	0.0	4.0	9.4	79.8	6.8

### Canton MSA

Branch distribution is reasonably accessible. The AA has eight low-income CTs and 17 moderate-income CTs. The bank has four branches in the AA. There are no branches located in low-income CTs and one branch located in a moderate-income CT. The percentage of branches in moderate-income CTs exceeds the percentage of the population in those CTs. One branch is near to one low- and one moderate-income CT, while two other branches are near to a moderate-income CT.

The bank supplements its traditional service delivery methods with alternative retail delivery systems, such as deposit-taking ATMs, online banking, and mobile banking. The bank operates eight deposit-taking ATMs in the AA, one which is in a moderate-income CT. These include four ATMs with deposit imaging and four with interactive teller capabilities.

### Cleveland MSA

Branch distribution is reasonably accessible. The AA has 80 low-income CTs and 117 moderate-income CTs. The bank has four branches in the AA. There are no branches located in low-income CTs and one branch located in a moderate-income CT. The percentage of branches in moderate-income CTs exceeds the percentage of the population in those CTs. One branch is near to one low- and three moderate-income CTs, while two other branches are near to a moderate-income CT.

The bank supplements its traditional service delivery methods with alternative retail delivery systems, such as deposit-taking ATMs, online banking, and mobile banking. The bank operates four deposit-taking ATMs in the AA, one which is in a moderate-income CT. Three branch ATMs also include deposit imaging capabilities.

### Wayne AA

Branch distribution is readily accessible. The AA has no low-income CTs and three moderate-income CTs. The bank has 10 branches in the AA. One branch is in a moderate-income CT. The percentage of

branches in moderate-income CTs exceeds the percentage of the population in those CTs. Three other branches are near to a moderate-income CT. No branches were opened or closed in this AA.

The bank supplements its traditional service delivery methods with alternative retail delivery systems, such as deposit-taking ATMs, online banking, and mobile banking. The bank operates 10 deposit-taking ATMs in the AA, one which is in a moderate-income CT. Eight ATMs also includes deposit imaging capabilities.

Youngstown MSA

Branch distribution is reasonably accessible. The AA has 12 low-income CTs and 34 moderate-income CTs. The bank has 20 branches in the AA. There are no branches located in low-income CTs and three branches located in a moderate-income CTs. The percentage of branches in moderate-income CTs is near to the percentage of the population in those CTs. One branch is near to one low- and three moderate-income CTs, while two other branches are near to a moderate-income CT.

The bank supplements its traditional service delivery methods with alternative retail delivery systems, such as deposit-taking ATMs, online banking, and mobile banking. The bank operates 24 deposit-taking ATMs in the AA, three of which are in a moderate-income CTs. Eighteen branch ATMs include deposit imaging capabilities, and six locations have interactive ATMs.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Branch Openings/Closings			
			Net change in Location of Branches (+ or -)			
			Low	Moderate	Middle	Upper
Cleveland MSA	1	2	0	0	-2	+1
Canton MSA	1	1	0	0	0	0
Youngstown MSA	1	3	0	0	0	-2

To the extent changes have been made, the bank’s opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AAs, particularly low- and moderate-income geographies and/or individuals.

**Community Development Services**

The bank provides an adequate level of CD services.

Canton MSA

The bank provides a relatively high level of CD services. Eight employees provided community development services to 11 organizations totaling 119 hours during the evaluation period. The CD service hours demonstrated complexity and leadership with the bank providing board services and other leadership roles in various CD service organizations. Bank employees provided 33 hours to organizations

on boards or in leadership roles. The bank's CD services were primarily responsive to community services in the AA. The following are examples of CD service hours:

- Two employees provided financial expertise as a board and executive committee member for an organization that promotes neighborhood revitalization by leading partnership-based, neighborhood-specific revitalization efforts and developing policies, programs, and tools that promote community reinvestment.
- One employee supported an organization that provides counseling, school-based support, group support, family empowerment, and case management resources by providing financial expertise as a vice president of the board. Most people served by the organization are LMI.
- One employee provided financial expertise as a chairman of the board for an organization that provides foster care, mental health, and related services for LMI youth who have been abandoned, abused, or neglected.

#### Cleveland MSA

The bank provides a low level of CD services. Six employees provided community development services to seven organizations totaling 20 hours during the evaluation period. The CD service hours demonstrated support for community development services, including mentoring and tutoring services for LMI youth.

#### Wayne AA

The bank provides a relatively high level of CD services. Twenty-one employees provided community development services to 13 organizations totaling 176 hours during the evaluation period. The CD service hours demonstrated complexity and leadership with the bank providing board services and other leadership roles in various CD service organizations. Bank employees provided 66 hours to organizations on boards or in leadership roles. The bank's CD services were primarily responsive to community services in the AA. Employees provided financial expertise, serving as board members and teaching financial literacy for organizations that provide programs which promote the education, health, social character, service, and leadership of LMI youth.

#### Youngstown MSA

The bank provides an adequate level of CD services. Sixteen employees provided community development services to 29 organizations totaling 179 hours during the evaluation period. The CD service hours demonstrated complexity and leadership with the bank providing board services and other leadership roles in various CD service organizations. Bank employees provided 95 hours to organizations on boards or in leadership roles. The bank's CD services were primarily responsive to community services in the AA. The following are examples of CD service hours:

- Two employees provided financial expertise as a board and finance committee member for an organization that works to transform vulnerable, undervalued, and transitional neighborhoods into healthy neighborhoods of choice.
- One employee supported an organization that provides public housing along with an extensive set of support services that include self-sufficiency programs, housing counseling, youth after school

programs and neighborhood networks computer by serving as a vice chair of the board of commissioners.

- One employee provided financial expertise as a board member and on the strategic planning committee for a local organization which promotes community services with development in community-based childcare, educational, health, or social services targeted at LMI individuals.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the Columbiana AA and the Stark MSA is consistent with the bank's overall performance under the Service Test in the full-scope areas.

## State Rating

### State of Pennsylvania

**CRA rating for the State of Pennsylvania:** Satisfactory

**The Lending Test is rated:** High Satisfactory

**The Investment Test is rated:** Needs to Improve

**The Service Test is rated:** Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs.
- The bank exhibits a good geographic distribution of loans.
- The bank exhibits a good distribution of loans among individuals of different income levels and business of different sizes.
- Service delivery systems are accessible to geographies and individuals of different income levels.

### Description of Bank's Operations in Pennsylvania

The 2023 merger with Emclair Financial Corporation did not add any new products or services but did expand the bank's market area to Pittsburgh and surrounding areas in Pennsylvania. As a result, FNB delineated two AAs in the state of Pennsylvania: the Pittsburgh MSA and the Pennsylvania Non-MSA. Refer to appendix A for the list of counties reviewed. The bank's state operations comprise 16.9 percent of total bank deposits and 27.0 percent of total bank branches. The Pittsburgh MSA received a full-scope evaluation. The components of the full-scope AA is discussed below.

#### Pittsburgh MSA

The Pittsburgh MSA consists of Allegheny, Armstrong, and Butler, Pennsylvania counties. In 2023, the AA contained 460 CTs and included 40 low-income CTs, 96 moderate-income CTs, 171 middle-income CTs, and 131 upper-income CTs. Twenty-two CTs had no income designation.

As of December 31, 2023, the bank had \$149.7 million in deposits in the MSA, representing 3.8 percent of the bank's total deposits. During the evaluation period, the bank made \$12.7 million or 1.3 percent of its total volume of CRA reportable loans within the AA.

The bank operates four full-service branches and four deposit taking ATMs within this AA. According to the June 30, 2023, FDIC deposit-market share report, there were 40 FDIC-insured banks operating 461 branches in the AA. The bank ranked 23<sup>rd</sup> in deposit market share with 0.1 percent. The top five competitors for deposits include PNC Bank, N.A., BNY Mellon N.A., Tristate Capital Bank, Citizens Bank, N.A., and First National Bank of Pennsylvania, which hold a combined 87.6 percent market share.

Most non-farm businesses in the AA are small as measured by the number of employees and gross revenues. According to 2023 D&B data, 88.6 percent of businesses located in the AA have less than \$1.0 million in gross annual revenues and 64.9 percent of businesses reported employing fewer than five

employees. Only 1.7 percent of businesses are headquartered in the AA, while 91.6 percent operate from a single location.

According to Moody's Analytics, the Pittsburgh economy is at risk. Monthly payroll gains are below average relative to the state. Healthcare growth throughout 2023 has been lagging behind the sector's performance, the employment rate is at the lowest point on record. Home prices increased, though slower than the majority of the U.S., during the post-pandemic boom. Area strengths include top education and research banks, low employment volatility, and low cost of living relative to other large northeast areas. Additionally, the manufacturing sector has expanded four times as fast as the national rate in the last year. Economic challenges include aging infrastructure, subpar population trends, negative net migration, and contracting population. UPMC Health System is the primary employer in the MSA. Other top employers included Highmark Health, University of Pittsburgh, PNC Bank, and Giant Eagle Inc.

According to the U.S. Bureau of Labor Statistics, the unemployment rates in Allegheny County and Butler County were 3.9 percent and 4.0 percent respectively in January 2023, consistent with the state of Pennsylvania at 4.0 percent. The unemployment rate in Armstrong County was elevated at 5.4 percent in January 2023. The unemployment rate dropped to 2.7 percent and 2.6 percent in Allegheny County and Butler County by December 2023 which was slightly lower than the state rate of 2.9 percent. The employment rate in Armstrong County remained higher than the state average at 3.6 percent in December 2023.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty. According to the 2020 U.S. Census, 6.8 percent of families in the Pittsburgh MSA had income below the federal poverty line.

Examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the median family income in the table below, low-income families earned less than \$3,443 per month, and moderate-income families earned less than \$5,510 per month. The maximum low-income and maximum moderate-income annual income calculations are based on 50.0 percent and 80.0 percent of the FFIEC adjusted median family income for the AA. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30.0 percent of the applicant's income. For the 2023 evaluation period, the calculated maximum affordable monthly mortgage payment was \$1,033 for a low-income borrower and \$1,653 for a moderate-income borrower. Assuming a 30-year mortgage with a 6.0 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$1,067. Based on this calculation, low-income borrowers would be challenged to qualify for a mortgage loan in the AA.

Examiners utilized three community contacts in this AA, including a non-profit membership organization, a local economic and residential development agency, and a small business development, public-private partnership. One contact identified the need for affordable housing and technical assistance to minority- and women-owned small businesses. The contact noted that many small businesses lack the proper back-room operational skills to qualify for loans under commercial underwriting standards. Another contact commented on the need for lending to entrepreneurs. A third contact discussed the funding gap for small dollar amount loans to assist individuals in starting new businesses. The contact further specified there was a need for unsecured loans that range between \$10,000 and \$50,000.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Pittsburgh MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	460	8.7	20.9	37.2	28.5	4.8
Population by Geography	1,509,899	6.4	17.4	38.2	36.8	1.3
Housing Units by Geography	719,374	7.1	20.1	39.4	32.5	0.8
Owner-Occupied Units by Geography	431,691	3.4	16.5	41.8	38.1	0.3
Occupied Rental Units by Geography	219,764	12.5	24.7	36.0	25.2	1.7
Vacant Units by Geography	67,919	14.1	28.6	35.6	20.3	1.4
Businesses by Geography	194,090	6.1	14.0	34.6	42.9	2.5
Farms by Geography	3,769	3.0	13.6	47.0	35.5	0.8
Family Distribution by Income Level	372,189	19.2	17.1	20.5	43.1	0.0
Household Distribution by Income Level	651,455	24.5	15.2	17.2	43.0	0.0
Median Family Income MSA - 38300 Pittsburgh, PA MSA		\$82,642	Median Housing Value			\$177,929
			Median Gross Rent			\$940
			Families Below Poverty Level			6.8%
<i>Source: 2020 U.S. Census and 2023 D&amp;B Data Due to rounding, totals may not equal 100.0%. (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Scope of Evaluation in Pennsylvania

OCC examiners evaluated FNB’s performance in the state of Pennsylvania by analyzing the bank's lending performance and its CD lending, investment, and service performance from January 1, 2023, through December 31, 2023. The OCC conducted a full-scope review of the Pittsburgh MSA. Examiners gave more weight to the performance of home mortgage loans as compared to small business loans due to fact they comprised the majority of CRA reportable loans in Pennsylvania. Based on the total number of reported loans, excluding CD loans, home mortgage loans represented 71.8 percent of loan originations and purchases during the evaluation period in Pennsylvania. Examiners did not consider consumer, multi-family or farm loans in this evaluation, as these lending products did not constitute a substantial majority of the bank’s business.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN PENNSYLVANIA

### LENDING TEST

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

### Conclusions for Areas Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Pittsburgh MSA is good.

## Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
<b>Full-Scope</b>							
Pittsburgh MSA	41	43	5	1	90	45.0	22.4
<b>Limited-Scope</b>							
PA non-MSA	79	27	3	1	110	55.0	77.6
<b>TOTAL</b>	<b>120</b>	<b>70</b>	<b>8</b>	<b>2</b>	<b>200</b>	<b>100.0</b>	<b>100.0</b>

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans (000) *							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State* Loans	% State Deposits
<b>Full-Scope</b>							
Pittsburgh MSA	\$8,669	\$4,048	\$198	\$19,368	\$32,283	63.5	22.4
<b>Limited-Scope</b>							
PA non-MSA	\$11,660	\$2,923	\$216	\$3,800	\$18,599	36.5	77.6
<b>TOTAL</b>	<b>\$20,329</b>	<b>\$6,971</b>	<b>\$414</b>	<b>\$23,168</b>	<b>\$50,882</b>	<b>100.00</b>	<b>100.0</b>

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

### Pittsburgh MSA

Significant competition for loans exists in the AA. Based on 2023 aggregate mortgage loan data, 535 lending banks reported originating or purchasing home mortgage loans. The bank had a 0.1 percent market share of home mortgage loan originations in the AA. The bank market share of home mortgage originations ranked 100<sup>th</sup> out of 535 lenders. The bank ranking of home mortgage loan originations was in the top 18.7 percent of all lenders in the AA.

Since the Pittsburgh MSA is being evaluated only for 2023 activity and the corresponding Peer Small Business data for 2023 was not available at the time of the evaluation, an analysis of the bank's small business lending activity was not performed.

## Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA.

### Pittsburgh MSA

#### **Home Mortgage Loans**

Refer to Table O in the state of Pennsylvania 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 geographical distribution of home mortgage loans in 2023 is good. The proportion of bank loans in low-income CTs exceeded both the percentage of owner-occupied housing units and the aggregate

industry distribution of home mortgage loans. The proportion of bank home mortgage loans in moderate-income CTs was well below both the percentage of owner-occupied housing units and the aggregate industry distribution of home mortgage loans.

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

Refer to Table Q in the state of Pennsylvania 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.

The geographic distribution of small loans to businesses in 2023 is excellent. The bank's proportion of small loans to businesses was near to the percentage of businesses and exceeded the aggregate industry distribution of small loans to businesses in low-income CTs. The bank's proportion of small loans to businesses exceeded both the percentage of businesses and the aggregate industry distribution of small loans to businesses in moderate-income CTs.

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

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. Examiners reviewed summary reports, maps, and analyzed the bank's lending activity over the evaluation period to identify any gaps in the geographic distribution of loans and did not identify any unexplained, conspicuous gaps.

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

The bank exhibits a good distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the bank.

### **Pittsburgh MSA**

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

Refer to Table P in the state of Pennsylvania 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.

When determining conclusions for borrower distribution of home mortgage loans, examiners considered that home mortgages may not be affordable to low-income borrowers in the AA based on the median housing value in the MSA. Therefore, examiners placed more emphasis on the comparison to the aggregate distribution of home mortgage loans to low-income borrowers.

The borrower distribution of home mortgage loans in 2023 is good. The proportion of bank loans to low-income borrowers was below the aggregate industry distribution of home mortgage loans and well below the percentage of low-income families. The proportion of bank loans to moderate-income borrowers exceeded both the percentage of families and the aggregate industry distribution of home mortgage loans to those borrowers.

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

Refer to Table R in the state of Pennsylvania 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.

The borrower distribution of small loans to businesses is good. The proportion of bank loans in 2023 was below the percentage of businesses but exceeded the aggregate industry distribution of small loans to businesses.

### **Community Development Lending**

The bank has made a relatively high level of CD loans. CD lending had a positive effect on the Lending Test conclusion in the state of Pennsylvania.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

During 2023, the bank identified one qualified CD loan totaling \$19.4 million. The loan was responsive to economic development and stabilization efforts in Butler County and will benefit the county's LMI CTs through a variety of water and transportation infrastructure projects.

### **Product Innovation and Flexibility**

The bank makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank supported affordable housing through participation in several home mortgage programs, including those with down payment and closing cost assistance, flexible underwriting, and no mortgage insurance requirements. FNB originated three flexible or innovative home mortgage loans, totaling \$495,000 through its internal affordable housing loan program. For a description of products see the "Innovative and Flexible Product" section of the Overall Description of Bank.

### **Conclusions for Area Receiving a Limited-Scope Review**

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

## **INVESTMENT TEST**

The bank's performance under the Investment Test in Pennsylvania is rated Needs to Improve.

### **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank's performance in the Pittsburgh MSA is poor.

The bank has a poor level of qualified CD investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits poor responsiveness to credit and community economic development needs. The bank does not use innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
<b>Full Review</b>										
Pittsburgh MSA	0	0	4	11	4	80.0	11	73.3	0	0
<b>Limited Review</b>										
PA non-MSA	0	0	1	4	1	20.0	4	26.7	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 bank's financial reporting system

### Pittsburgh MSA

The bank exhibited poor responsiveness to AA community investment needs. During the evaluation period, the bank funded four qualified donations totaling \$11,000, representing 0.1 percent of allocated tier 1 capital. Donations supported community services and economic development.

### Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the PA non-MSA is consistent with the bank's overall performance under the Investment Test in the full-scope area.

### SERVICE TEST

The bank's performance under the Service Test in Pennsylvania is rated Low Satisfactory.

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Pittsburgh MSA is adequate.

### Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
		# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
	Low			Mod	Mid	Upp	Low	Mod	Mid	Upp	
<b>Full-Scope</b>											
Pittsburgh MSA	22.4	4	23.6	0.0	25.0	25.0	50.0	6.4	17.4	38.2	36.8
<b>Limited-Scope</b>											
PA non-MSA	77.6	13	76.4	0.0	23.1	76.9	0.0	0.0	13.4	80.1	6.4

Pittsburgh MSA

The AA has 40 low-income CTs and 96 moderate-income CTs. The bank has four branches in the AA. There are no branches located in low-income CTs and one branch located in a moderate-income CT. The percentage of branches in moderate-income CTs exceeds the percentage of the population in those CTs. One branch is near to four low- and nine moderate-income CTs, while two other branches are near to one low- and three moderate-income CTs, combined.

The bank supplements its traditional service delivery methods with alternative retail delivery systems, such as deposit-taking ATMs, online banking, and mobile banking. The bank operates four deposit-taking ATMs in the AA, one of which is in a moderate-income CT.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings		Net change in Location of Branches (+ or -)			
	# of Branch Openings	# of Branch Closings	Low	Moderate	Middle	Upper
Pittsburgh MSA	0	1	0	0	-1	0

To the extent changes have been made, the bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and/or individuals. Services offered and branch hours are comparable among locations regardless of the income level of the area.

### Community Development Services

The bank provides a low level of CD services. One employee provided 19 hours of qualified community development services to three organizations during the evaluation period. The bank's CD services were primarily responsive to revitalization, economic development, and community services in the AA.

### Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the PA non-MSA is better than the bank's overall performance under the Service Test in the full-scope area.

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed:</b>	1/1/2021 through 12/31/2023	
<b>Bank Products Reviewed:</b>	Home mortgage, small business, small farm Community development loans, qualified investments, community development services	
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>MMSA(s)</b>		<b>Counties</b>
Youngstown MMSA	Full scope	2023 only: Ohio – Mahoning, Trumbull; PA - Mercer
<b>State Rating Area</b>		
<b>Ohio</b>		
Akron MSA	Limited scope	2022-2023 only: Portage, Summit
Columbiana	Limited scope	Columbiana
Cleveland MSA	Full scope	Cuyahoga, Geauga, Lake, Medina
Canton MSA	Full scope	Stark
Wayne	Full scope	Holmes, Wayne
Youngstown MSA	Full scope	2021-2022 only: Mahoning, Trumbull
<b>Pennsylvania</b>		
Pittsburgh MSA	Full scope	2023 only: Allegheny, Armstrong, Butler
Pittsburgh non-MSA	Limited scope	2023 only: Clarion, Clearfield, Crawford, Elk, Jefferson, Venango

**Appendix B: Summary of MMSA and State Ratings**

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RATINGS Farmers National Bank of Canfield				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Farmers	High Satisfactory	Needs to Improve	Low Satisfactory	Satisfactory
MMSA or State:				
Youngstown MMSA	High Satisfactory	Needs to Improve	High Satisfactory	Satisfactory
Ohio	High Satisfactory	Needs to Improve	Low Satisfactory	Satisfactory
Pennsylvania	High Satisfactory	Needs to Improve	Low Satisfactory	Satisfactory

(\*) The Lending Test is weighted more heavily than the Investment and Service Tests 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 §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

**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 bank 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 Banks 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.

**MMSA (state):** Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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

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

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

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

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

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

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

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

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

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

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. 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.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

**Youngstown MMSA Lending**

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																			<b>2023</b>
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Youngstown MMSA	477	73,308,281	100.0	11,353	3.5	0.2	1.8	16.0	9.4	14.5	51.6	48.2	52.3	28.6	42.1	31.3	0.4	0.0	0.2
<b>Total</b>	<b>477</b>	<b>73,308,281</b>	<b>100.0</b>	<b>11,353</b>	<b>3.5</b>	<b>0.2</b>	<b>1.8</b>	<b>16.0</b>	<b>9.4</b>	<b>14.5</b>	<b>51.6</b>	<b>48.2</b>	<b>52.3</b>	<b>28.6</b>	<b>42.1</b>	<b>31.3</b>	<b>0.4</b>	<b>0.0</b>	<b>0.2</b>

*Source: 2020 U.S. Census; 01/01/2023 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%*

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2023</b>
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Youngstown MMSA	477	73,308,281	100.0	11,353	22.1	7.1	10.5	16.8	20.1	24.0	21.1	22.2	23.7	40.0	43.2	28.8	0.0	7.3	12.9
<b>Total</b>	<b>477</b>	<b>73,308,281</b>	<b>100.0</b>	<b>11,353</b>	<b>22.1</b>	<b>7.1</b>	<b>10.5</b>	<b>16.8</b>	<b>20.1</b>	<b>24.0</b>	<b>21.1</b>	<b>22.2</b>	<b>23.7</b>	<b>40.0</b>	<b>43.2</b>	<b>28.8</b>	<b>0.0</b>	<b>7.3</b>	<b>12.9</b>

*Source: 2020 U.S. Census; 01/01/2023 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2023
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$(000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Youngstown MMSA	176	29,012	100.0	9,097	6.2	2.3	4.6	16.5	19.9	13.3	42.8	44.9	46.4	34.2	32.4	35.2	0.4	0.6	0.5
Source: 2023 D&B Data; 01/01/2023 - 12/31/2023 Bank Data; 2022 CRA Aggregate 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												2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$(000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Youngstown MMSA	176	29,012	100.0	9,097	88.6	70.5	53.6	3.3	29.5	8.1	0.0	
Source: 2023 D&B Data; 01/01/2023 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%												

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography													2023
Assessment Area:	Total Loans to Farms			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans
Youngstown MMSA	24	1,245	100.0	2.2	0.0	12.9	0.0	53.2	75.0	31.6	25.0	0.1	0.0
<b>Total</b>	<b>24</b>	<b>1,245</b>	<b>100.0</b>	<b>2.2</b>	<b>0.0</b>	<b>12.9</b>	<b>0.0</b>	<b>53.2</b>	<b>75.0</b>	<b>31.6</b>	<b>25.0</b>	<b>0.1</b>	<b>0.0</b>

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

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Youngstown MMSA	24	1,245	100.0	--	98.4	100.0	--	0.8	0.0	0.8	0.0	
<b>Total</b>	<b>24</b>	<b>1,245</b>	<b>100.0</b>	<b>--</b>	<b>98.4</b>	<b>100.0</b>	<b>--</b>	<b>0.8</b>	<b>0.0</b>	<b>0.8</b>	<b>0.0</b>	

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

**Ohio Lending**

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Cleveland MSA	160	40,467,643	9.3	86,114	6.3	3.8	3.3	16.4	6.3	13.2	37.0	41.9	37.7	40.1	48.1	45.7	0.2	0.0	0.0
Columbiana	208	22,128,591	12.1	3,527	0.0	0.0	0.0	5.7	3.4	3.0	82.0	85.6	83.7	12.3	11.1	13.3	0.0	0.0	0.0
Canton MSA	226	40,956,822	13.1	18,003	3.7	1.3	1.3	8.9	4.0	5.3	67.3	77.4	68.0	20.1	17.3	25.3	0.0	0.0	0.0
Wayne	409	69,109,568	23.8	4,852	0.0	0.0	0.0	5.9	4.2	7.0	72.1	75.6	67.0	21.9	20.3	25.8	0.1	0.0	0.1
Youngstown MSA	718	99,221,766	41.7	16,916	5.7	0.7	1.0	13.6	5.9	8.3	49.5	43.5	52.1	31.2	50.0	38.6	0.0	0.0	0.0
<b>Total</b>	<b>1,721</b>	<b>271,884,390</b>	<b>100.0</b>	<b>129,412</b>	<b>5.3</b>	<b>0.8</b>	<b>2.5</b>	<b>14.0</b>	<b>4.9</b>	<b>11.0</b>	<b>46.7</b>	<b>60.5</b>	<b>46.2</b>	<b>33.9</b>	<b>33.8</b>	<b>40.3</b>	<b>0.1</b>	<b>0.0</b>	<b>0.0</b>

*Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%*

**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** **2022-23**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Akron MSA	188	38,415,342	9.0	17,021	5.1	6.9	5.7	17.4	11.7	19.7	42.8	47.3	40.9	34.5	32.4	33.4	0.1	1.6	0.2
Canton MSA	297	55,639,430	14.3	8,755	3.5	2.7	3.4	11.1	9.4	11.0	52.9	61.6	51.8	32.5	26.3	33.8	0.0	0.0	0.0
Cleveland MSA	166	38,486,892	8.0	39,186	5.9	1.8	5.3	15.5	10.2	15.9	37.7	43.4	39.7	39.9	43.4	38.4	1.1	1.2	0.7
Columbiana	263	30,494,381	12.6	1,892	2.2	1.9	2.2	6.6	3.0	5.8	83.6	87.1	84.1	7.6	8.0	7.9	0.0	0.0	0.0
Wayne	541	91,445,972	26.0	2,461	0.0	0.0	0.0	4.1	4.3	6.0	74.7	69.5	76.9	21.2	26.2	17.1	0.0	0.0	0.0
Youngstown MSA (2022)	628	94,217,064	30.1	12,931	3.7	1.3	1.3	17.7	7.5	14.4	53.2	45.2	54.7	24.9	45.9	29.2	0.5	0.2	0.3
<b>Total</b>	<b>2,083</b>	<b>348,699,081</b>	<b>100.0</b>	<b>82,246</b>	<b>5.0</b>	<b>2.0</b>	<b>4.9</b>	<b>14.5</b>	<b>6.7</b>	<b>15.6</b>	<b>44.3</b>	<b>65.2</b>	<b>44.0</b>	<b>35.6</b>	<b>25.7</b>	<b>35.0</b>	<b>0.6</b>	<b>0.3</b>	<b>0.5</b>

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2021**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Cleveland MSA	160	40,467,643	9.3	86,114	23.0	3.1	8.4	16.5	15.6	18.9	19.0	16.3	21.8	41.5	53.8	36.9	0.0	11.3	14.0
Columbiana	208	22,128,591	12.1	3,527	20.8	9.1	8.5	19.0	23.1	20.6	21.7	25.5	22.8	38.6	39.4	34.7	0.0	2.9	13.4
Canton MSA	226	40,956,822	13.1	18,003	19.5	5.3	8.2	18.7	15.5	19.9	21.8	29.6	22.7	40.0	46.0	33.6	0.0	3.5	15.5
Wayne	409	69,109,568	23.8	4,852	15.7	5.4	5.0	19.1	28.1	19.9	22.0	24.5	25.1	43.2	40.8	37.5	0.0	1.2	12.5
Youngstown MSA	718	99,221,766	41.7	16,916	21.2	8.5	8.0	18.0	18.1	21.7	20.5	22.0	22.5	40.3	47.4	32.0	0.0	4.0	15.7
<b>Total</b>	<b>1,721</b>	<b>271,884,390</b>	<b>100.0</b>	<b>129,412</b>	<b>21.7</b>	<b>6.9</b>	<b>8.2</b>	<b>17.3</b>	<b>20.5</b>	<b>19.5</b>	<b>19.9</b>	<b>23.5</b>	<b>22.2</b>	<b>41.1</b>	<b>45.3</b>	<b>35.8</b>	<b>0.0</b>	<b>3.8</b>	<b>14.3</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2022-23**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Akron MSA	188	38,415,342	9.0	17,021	20.7	7.4	13.1	17.7	26.6	23.4	21.3	19.7	21.5	40.3	38.3	27.8	0.0	8.0	14.2
Cleveland MSA	166	38,486,892	14.3	39,186	22.5	9.0	10.1	17.0	10.2	22.5	19.2	23.5	20.6	41.3	44.0	31.8	0.0	13.3	15.1
Columbiana	263	30,494,381	8.0	1,892	21.9	12.9	13.1	18.0	24.7	27.0	22.4	25.1	23.3	37.8	31.2	25.7	0.0	6.1	11.0
Canton MSA	297	55,639,430	12.6	8,755	19.5	7.1	10.1	18.6	20.2	24.7	21.4	25.9	22.7	40.4	40.7	29.5	0.0	6.1	13.0
Wayne	541	91,445,972	26.0	2,461	14.5	5.5	6.9	17.1	25.0	22.2	24.2	27.2	26.9	44.2	37.2	33.2	0.0	5.2	10.8
Youngstown MSA (2022)	628	94,217,064	30.1	12,931	22.6	7.0	9.2	16.9	16.2	21.7	21.4	20.5	22.5	39.1	47.5	32.3	0.0	8.8	14.3
<b>Total</b>	<b>2,083</b>	<b>348,699,081</b>	<b>100.0</b>	<b>82,246</b>	<b>21.3</b>	<b>7.8</b>	<b>10.8</b>	<b>17.4</b>	<b>22.5</b>	<b>23.1</b>	<b>20.3</b>	<b>25.2</b>	<b>21.3</b>	<b>41.0</b>	<b>37.7</b>	<b>30.4</b>	<b>0.0</b>	<b>6.8</b>	<b>14.4</b>

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

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

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Cleveland MSA	156	25,810	12.3	47,185	8.6	8.3	8.5	17.0	18.6	17.4	31.9	34.6	30.7	41.5	38.5	42.3	1.1	0.0	1.1
Columbiana	163	10,716	12.9	1,713	0.0	0.0	0.0	4.9	1.8	2.3	79.6	84.0	83.8	15.5	14.1	13.0	0.0	0.0	0.8
Canton MSA	175	23,545	13.8	6,734	5.4	5.1	5.3	7.3	5.7	6.1	63.4	72.6	61.5	21.3	16.0	24.9	2.6	0.6	2.2
Wayne	239	19,329	18.9	2,843	0.0	0.0	0.0	8.1	5.9	6.3	74.2	66.5	76.2	17.6	27.6	16.3	0.1	0.0	1.1
Youngstown MSA	532	60,469	42.1	8,116	8.7	4.7	8.1	13.3	12.0	11.6	39.8	35.5	38.7	38.2	47.7	41.2	0.0	0.0	0.4
<b>Total</b>	<b>1,265</b>	<b>139,869</b>	<b>100.0</b>	<b>66,591</b>	<b>7.6</b>	<b>3.7</b>	<b>7.5</b>	<b>14.7</b>	<b>9.5</b>	<b>14.7</b>	<b>39.5</b>	<b>52.6</b>	<b>38.1</b>	<b>37.1</b>	<b>34.1</b>	<b>38.5</b>	<b>1.0</b>	<b>0.1</b>	<b>1.1</b>

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

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

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$(000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Akron MSA	148	22,711	13.5	14,756	17.2	6.1	6.2	13.6	10.1	14.2	32.0	56.1	37.1	33.9	27.7	40.5	3.3	0.0	2.0
Cleveland MSA	228	35,326	20.9	41,458	9.4	4.8	7.6	16.6	10.1	15.2	26.5	29.8	28.8	45.6	55.3	46.6	1.9	0.0	1.9
Columbiana	125	8,628	11.4	2,140	3.9	2.4	1.7	5.5	6.4	4.3	85.5	78.4	83.9	5.0	12.8	6.1	0.0	0.0	4.1
Canton MSA	156	29,261	14.3	6,444	5.2	7.1	4.5	14.2	11.5	10.1	49.9	48.1	48.2	30.7	33.3	36.6	0.0	0.0	0.6
Wayne	241	23,455	22.1	3,399	0.0	0.0	0.0	4.3	6.6	4.3	76.4	70.5	72.2	19.3	22.8	19.5	0.0	0.0	4.0
Youngstown MSA (2022)	194	33,423	17.8	7,459	6.0	3.1	4.5	18.6	12.4	14.5	42.3	51.0	47.0	32.7	33.5	32.4	0.5	0.0	1.5
<b>Total</b>	<b>1,092</b>	<b>152,804</b>	<b>100.0</b>	<b>75,656</b>	<b>10.3</b>	<b>3.8</b>	<b>6.4</b>	<b>15.1</b>	<b>8.9</b>	<b>13.6</b>	<b>32.6</b>	<b>55.0</b>	<b>36.4</b>	<b>40.1</b>	<b>32.3</b>	<b>41.6</b>	<b>2.0</b>	<b>0.0</b>	<b>2.0</b>

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

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** **2021**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$(000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Cleveland MSA	156	25,810	12.3	47,185	83.9	38.5	48.8	6.1	19.9	10.0	41.7
Columbiana	163	10,716	12.9	1,713	80.6	42.3	50.7	6.3	3.7	13.2	54.0
Canton MSA	175	23,545	13.8	6,734	82.5	42.3	46.2	5.9	14.3	11.6	43.4
Wayne	239	19,329	18.9	2,843	82.0	31.0	48.8	6.7	6.7	11.2	62.3
Youngstown MSA	532	60,469	42.1	8,116	81.1	22.7	47.1	6.0	10.9	12.9	66.4
<b>Total</b>	<b>1,265</b>	<b>139,869</b>	<b>100.0</b>	<b>66,591</b>	<b>83.2</b>	<b>31.5</b>	<b>48.4</b>	<b>6.1</b>	<b>10.8</b>	<b>10.7</b>	<b>57.8</b>

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

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** **2022-23**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$(000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Akron MSA	148	22,711	13.6	14,756	91.2	60.1	49.7	2.9	39.9	5.9	0.0
Cleveland MSA	228	35,326	20.9	41,458	91.9	58.3	50.6	2.8	41.7	5.4	0.0
Columbiana	125	8,628	11.4	2,140	87.6	88.8	48.3	3.8	11.2	8.6	0.0
Canton MSA	156	29,261	14.3	6,444	89.8	61.5	49.0	3.1	38.5	7.1	0.0
Wayne	241	23,455	22.1	3,399	89.6	75.9	44.1	3.5	24.1	6.8	0.0
Youngtown MSA (2022)	194	33,423	17.8	7,459	88.3	68.0	52.9	3.6	32.0	8.1	0.0
<b>Total</b>	<b>1,092</b>	<b>152,804</b>	<b>100.0</b>	<b>75,656</b>	<b>91.4</b>	<b>68.2</b>	<b>49.8</b>	<b>2.9</b>	<b>31.8</b>	<b>5.7</b>	<b>0.0</b>

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

**Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2021**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Cleveland MSA	39	1,138	13.7	254	4.3	0.0	0.8	12.7	7.7	7.0	37.0	59.0	45.3	45.8	33.3	46.1	0.2	0.0	0.8
Columbiana	23	1,025	8.1	108	0.0	0.0	0.0	0.6	0.0	0.0	82.5	91.3	87.0	16.9	8.7	13.0	0.0	0.0	0.0
Canton MSA	46	4,459	16.1	107	1.7	0.0	0.0	2.3	2.2	1.9	76.1	76.1	81.3	19.6	21.7	16.8	0.2	0.0	0.0
Wayne	139	11,750	48.8	304	0.0	0.0	0.0	3.3	1.4	1.0	71.5	69.8	72.1	25.3	28.8	26.6	0.0	0.0	0.3
Youngstown MSA	38	2,599	13.3	125	2.9	0.0	1.6	7.6	0.0	0.0	51.2	50.0	54.4	38.3	50.0	44.0	0.0	0.0	0.0
<b>Total</b>	<b>285</b>	<b>20,971</b>	<b>100.0</b>	<b>898</b>	<b>2.9</b>	<b>0.0</b>	<b>0.4</b>	<b>8.7</b>	<b>2.1</b>	<b>2.6</b>	<b>51.4</b>	<b>68.4</b>	<b>64.9</b>	<b>36.9</b>	<b>29.5</b>	<b>31.7</b>	<b>0.1</b>	<b>0.0</b>	<b>0.3</b>

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

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																				2022
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Youngtown MSA	34	2,540	100.0	137	2.1	0.0	0.0	14.1	5.9	4.4	59.9	64.7	73.7	23.6	29.4	21.9	0.2	0.0	0.0	
<b>Total</b>	<b>34</b>	<b>2,540</b>	<b>100.0</b>	<b>137</b>	<b>2.1</b>	<b>0.0</b>	<b>0.0</b>	<b>14.1</b>	<b>5.9</b>	<b>4.4</b>	<b>59.9</b>	<b>64.7</b>	<b>73.7</b>	<b>23.6</b>	<b>29.4</b>	<b>21.9</b>	<b>0.2</b>	<b>0.0</b>	<b>0.0</b>	

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

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																				2022-23
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Akron MSA	74	1,943	15.4	125	16.6	0.0	2.4	11.8	2.7	1.6	40.2	75.7	64.6	30.6	21.6	29.9	0.7	0.0	1.6	
Cleveland MSA	52	2,085	10.8	219	6.5	1.9	2.3	15.2	1.9	9.1	32.4	53.8	48.0	45.2	42.3	39.4	0.7	0.0	1.4	
Columbiana	28	1,214	5.8	120	1.0	0.0	0.0	2.1	10.7	4.9	91.0	78.6	84.4	6.0	10.7	9.0	0.0	0.0	1.6	
Canton MSA	79	5,327	16.4	108	2.8	0.0	0.9	7.2	1.3	2.8	56.0	58.2	61.1	34.0	40.5	35.2	0.0	0.0	0.0	
Wayne	248	25,954	51.6	314	0.0	0.0	0.0	2.6	0.8	1.9	76.2	77.0	74.1	21.3	22.2	23.0	0.0	0.0	0.9	
<b>Total</b>	<b>481</b>	<b>36,523</b>	<b>100.0</b>	<b>886</b>	<b>7.5</b>	<b>0.2</b>	<b>1.0</b>	<b>11.6</b>	<b>1.9</b>	<b>4.1</b>	<b>44.1</b>	<b>71.3</b>	<b>66.1</b>	<b>36.3</b>	<b>26.6</b>	<b>27.6</b>	<b>0.5</b>	<b>0.0</b>	<b>1.1</b>	

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

<b>Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues</b>												<b>2021</b>
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Cleveland MSA	39	1,138	13.7	254	96.0	97.4	60.9	2.2	2.6	1.8	0.0	
Columbiana	23	1,025	8.1	108	98.2	100.0	55.6	1.2	0.0	0.6	0.0	
Canton MSA	46	4,459	16.1	107	97.1	91.3	68.2	2.0	8.7	1.0	0.0	
Wayne	139	11,750	48.8	304	97.6	87.8	68.2	1.6	12.2	0.8	0.0	
Youngstown MSA	38	2,599	13.3	125	97.8	92.1	59.2	1.3	7.9	0.9	0.0	
<b>Total</b>	<b>285</b>	<b>20,971</b>	<b>100.0</b>	<b>898</b>	<b>96.8</b>	<b>91.2</b>	<b>63.4</b>	<b>1.9</b>	<b>8.8</b>	<b>1.3</b>	<b>0.0</b>	
<i>Source: 2021 D&amp;B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>												

<b>Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues</b>												<b>2022</b>
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Youngtown MSA	34	2,540	100.0	137	98.5	100.0	64.2	0.7	0.0	0.7	0.0	
<b>Total</b>	<b>34</b>	<b>2,540</b>	<b>100.0</b>	<b>137</b>	<b>98.5</b>	<b>100.0</b>	<b>64.2</b>	<b>0.7</b>	<b>0.0</b>	<b>0.7</b>	<b>0.0</b>	
<i>Source: 2022 D&amp;B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>												

<b>Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues</b>											<b>2022-23</b>	
<b>Assessment Area:</b>	<b>Total Loans to Farms</b>				<b>Farms with Revenues &lt;= 1MM</b>			<b>Farms with Revenues &gt; 1MM</b>		<b>Farms with Revenues Not Available</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Farms</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Farms</b>	<b>% Bank Loans</b>	<b>% Farms</b>	<b>% Bank Loans</b>	
Akron MSA	74	1,943	15.4	125	97.9	100.0	72.4	1.2	0.0	1.0	0.0	
Cleveland MSA	52	2,085	10.8	219	97.5	96.2	69.7	1.2	3.8	1.3	0.0	
Columbiana	28	1,214	5.8	120	99.0	100.0	49.2	0.6	0.0	0.4	0.0	
Canton MSA	79	5,327	16.4	108	98.0	93.7	74.1	1.3	6.3	0.7	0.0	
Wayne	248	25,954	51.6	314	98.3	85.1	67.5	1.0	14.9	0.7	0.0	
<b>Total</b>	<b>481</b>	<b>36,523</b>	<b>100.0</b>	<b>886</b>	<b>97.8</b>	<b>90.9</b>	<b>67.0</b>	<b>1.2</b>	<b>9.1</b>	<b>1.0</b>	<b>0.0</b>	
<i>Source: 2023 D&amp;B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>												

**Pennsylvania Lending**

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																			<b>2023</b>
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
PA non-MSA	79	11,659,785	65.8	5,036	0.0	0.0	0.0	10.8	16.5	11.4	82.8	75.9	81.1	6.4	7.6	7.5	0.0	0.0	0.0
Pittsburgh MSA	41	8,668,876	34.2	33,081	3.4	9.8	2.9	16.5	7.3	14.2	41.8	48.8	39.3	38.1	34.1	43.3	0.3	0.0	0.3
<b>Total</b>	<b>120</b>	<b>20,328,661</b>	<b>100.0</b>	<b>38,117</b>	<b>3.4</b>	<b>3.3</b>	<b>2.9</b>	<b>15.4</b>	<b>13.3</b>	<b>13.8</b>	<b>50.0</b>	<b>66.7</b>	<b>44.8</b>	<b>32.0</b>	<b>16.7</b>	<b>38.6</b>	<b>0.3</b>	<b>0.0</b>	<b>0.3</b>

*Source: 2020 U.S. Census; 01/01/2023 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%*

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2023</b>
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
PA non-MSA	79	11,659,785	65.8	5,036	19.5	10.1	10.6	19.3	25.3	24.2	23.2	19.0	24.0	38.0	31.6	30.1	0.0	13.9	11.2
Pittsburgh MSA	41	8,668,876	34.2	33,081	19.2	7.3	10.8	17.1	26.8	20.5	20.5	12.2	19.9	43.1	41.5	32.6	0.0	12.2	16.2
<b>Total</b>	<b>120</b>	<b>20,328,661</b>	<b>100.0</b>	<b>38,117</b>	<b>19.3</b>	<b>9.2</b>	<b>10.8</b>	<b>17.5</b>	<b>25.8</b>	<b>21.0</b>	<b>21.0</b>	<b>16.7</b>	<b>20.4</b>	<b>42.2</b>	<b>35.0</b>	<b>32.3</b>	<b>0.0</b>	<b>13.3</b>	<b>15.5</b>

*Source: 2020 U.S. Census; 01/01/2023 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%*

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2023**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
PA non-MSA	27	3,923	38.6	4,570	0.0	0.0	0.0	16.3	3.7	13.1	78.0	96.3	80.2	5.7	0.0	5.5	0.0	0.0	1.2
Pittsburgh MSA	43	4,048	61.4	31,012	6.1	4.7	4.5	14.0	16.3	13.1	34.6	44.2	35.7	42.9	34.9	41.5	2.5	0.0	5.2
<b>Total</b>	<b>70</b>	<b>7,971</b>	<b>100.0</b>	<b>35,582</b>	<b>6.1</b>	<b>2.9</b>	<b>4.5</b>	<b>14.3</b>	<b>11.4</b>	<b>13.1</b>	<b>40.0</b>	<b>64.3</b>	<b>32.4</b>	<b>38.2</b>	<b>21.4</b>	<b>36.9</b>	<b>2.2</b>	<b>0.0</b>	<b>4.7</b>

Source: 2023 D&B Data; 01/01/2023 - 12/31/2023 Bank Data; 2022 CRA Aggregate 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** **2023**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
PA non-MSA	27	3,923	38.6	4,570	84.5	51.9	58.0	4.3	48.1	11.2	0.0
Pittsburgh MSA	43	4,048	61.4	31,012	88.4	60.5	48.8	3.5	39.5	8.1	0.0
<b>Total</b>	<b>70</b>	<b>7,971</b>	<b>100.0</b>	<b>35,582</b>	<b>88.1</b>	<b>57.1</b>	<b>53.4</b>	<b>3.6</b>	<b>42.9</b>	<b>8.3</b>	<b>0.0</b>

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