



PUBLIC DISCLOSURE

October 20, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Kingston National Bank
Charter Number: 9536

2 N Main Street
Kingston, OH 45644

Office of the Comptroller of the Currency

4555 Lake Forest Dr., Suite 520
Cincinnati, OH 45242

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

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Overall CRA Rating

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

The lending test is rated: Satisfactory.

The community development test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on satisfactory performance in the state of Ohio. Kingston National Bank (KNB or bank) exhibits a reasonable distribution of loans among borrowers and geographies of different income levels and businesses and farms of different sizes given the product lines offered by the bank.
- The Community Development (CD) Test rating is based on satisfactory performance in the state of Ohio. KNB demonstrates adequate responsiveness to CD needs and opportunities by engaging in a combination of CD loans, CD services, and qualified investments (CD donations).
- KNB's loan-to-deposit (LTD) ratio is reasonable.
- A majority of the bank's loans are inside its assessment areas (AAs).
- The bank has not received any complaints about its Community Reinvestment Act (CRA) performance in helping to meet the AAs' credit needs during the evaluation period.

Loan-to-Deposit Ratio

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

KNB's quarterly average LTD ratio over the 12 quarters (January 1, 2022, to December 31, 2024) since the previous CRA Performance Evaluation was 74.81 percent. The ratio ranged from a high of 78.04 percent as of December 31, 2022, to a low of 70.06 percent as of March 31, 2023. The bank's quarterly average LTD ratio was below the quarterly average LTD ratio of 85.83 percent for similarly situated financial institutions headquartered in Ross, Pickaway, Fairfield, and Hocking Counties in Ohio. The custom peer group consisted of eight financial institutions with total assets between \$211 million and \$1.5 billion, and quarterly average LTD ratios ranging from 58.79 percent to 124.99 percent. KNB ranked sixth highest out of the similarly situated financial institutions in the AAs for an average LTD ratio during the evaluation period.

Lending in Assessment Area

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

The bank originated and purchased 70.9 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	317	72.4	121	27.6	438	58,645	66.9	29,070	33.1	87,715
Small Business	81	67.5	39	32.5	120	21,951	46.1	25,676	53.9	47,626
Small Farm	83	69.2	37	30.8	120	13,687	55.4	11,039	44.6	24,726
Total	481	70.9	197	29.1	678	94,283	58.9	65,785	41.1	160,067

*Source: 1/1/2022 - 12/31/2024 Bank Data.
Due to rounding, totals may not equal 100.0%*

Description of Institution

KNB is a wholly owned subsidiary of Kingston Bancshares, Inc., a one-bank holding company. Both the bank and holding company are headquartered in Kingston, Ohio. As of December 31, 2024, total assets were \$569.2 million, with \$406.9 million in net loans and leases, \$525.6 million in total deposits, and \$49.8 million in tier 1 capital. There was no merger or acquisition activity that affected the scope of the bank's operations during the evaluation period.

The bank's main office in Kingston, Ohio is located approximately 50 miles southeast of Columbus, Ohio in Ross County in an middle-income census tract (CT). The bank has five other branch locations in Ohio, and all have drive-up facilities and automated teller machines. The Chillicothe and Adelphi branches are in Ross County in middle- and upper-income CTs, as of the 2015 American Community Survey (ACS) U.S. Census data. The Amanda branch in Fairfield County is in a moderate-income CT. The bank has two branches in Pickaway County, the South Bloomfield branch in a middle-income CT and the Circleville branch in a moderate-income CT. No offices have been opened or closed since the prior CRA evaluation in 2021.

KNB is a single-state financial institution with one rating area (Ohio) and two AAs in Ohio. The first AA includes all of Ross County, Ohio, which is in a non-metropolitan statistical area (OH Non-MSA AA). The bank's second AA is in the Columbus, Ohio MSA 18140 and includes Pickaway County, in its entirety, CTs 0325.01, 0325.02, 0326.01 and 0326.02 in Fairfield County, and CT 9650 in Hocking County (Columbus MSA AA). The AAs are contiguous, meet the requirements of the regulation, and do not reflect illegal discrimination, nor do they arbitrarily exclude any low- and moderate-income (LMI) areas. The AAs are described in the "Scope of the Evaluation" and "Description of Institution's Operations in Ohio" sections in this performance evaluation (PE).

As of the December 31, 2024, Consolidated Reports of Condition and Income (Call Report) and Uniform Bank Performance Report, KNB's total loans were \$410.8 million representing 72.2 percent of total assets. The bank offers a variety of traditional lending and deposit products to accommodate its customers, including business, farm, home mortgage, and consumer loans. Deposit products include standard checking, savings, and certificates of deposit. The bank also offers online and mobile banking.

The bank's primary lending focus is residential real estate (home mortgage), agriculture (farm), and commercial and industrial and commercial real estate (business) lending. KNB's loan portfolio, as of the December 31, 2024, Call Report, was comprised of 35.4 percent home mortgage loans, 37.3 percent farm loans, 13.8 percent business loans, and 13.5 percent consumer loans. Loan originations and purchases, based on the number of loans during the evaluation period, were 14.8 percent home mortgages, 28.5 percent business loans, 36.7 percent farm loans, and 19.9 percent consumer loans. Loan originations and purchases, based on the dollar amount of loans during the evaluation period, were 35.8

percent home mortgages, 30.1 percent business loans, 26.4 percent farm loans, and 7.7 percent consumer loans.

There are no financial, legal, or other factors that impede the bank's ability to help meet the credit needs of its AAs. KNB's previous CRA rating was Satisfactory as of October 3, 2022.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The Office of the Comptroller of the Currency (OCC) conducted a CRA performance evaluation to assess the bank's record of meeting the credit and CD needs of its entire community, including LMI areas. The OCC used intermediate small bank CRA evaluation procedures to assess the bank's performance under the Lending and CD Tests. At the time of the evaluation, aggregate data was not available for 2024. For 2022-2023, bank data will be compared against both aggregate and demographic data. For 2024, bank data will be compared only against demographic data.

Based on discussions with management and the number and dollar volume of loan origination and purchase data supplied by the bank during the evaluation period, home mortgage, business, and farm lending are the KNB's primary lending products and were evaluated under the Lending Test. While the bank offers other lending products, these products were not a primary product during the evaluation period and were not considered in this PE, as an analysis of this data would not be meaningful. KNB's primary lending products are discussed under the "Description of Institution" section in this PE.

For the Lending Test, the OCC evaluated home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA) for 2022, 2023, and 2024. The OCC also transaction tested 120 farm loans and 120 business loans originated during the evaluation period for the Lending Test. The OCC relied on internal bank reports for the transaction testing of small farm and small business loans originated or purchased during the evaluation period. No affiliate activity was included in this analysis. For analysis purposes, the OCC compared the bank's lending performance with demographic data from the 2020 and 2024 ACS U.S. Census data and 2023 Dun and Bradstreet (D&B) data. Refer to the table in appendix A, Scope of the Examination, for more information on the scope of the review.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AA within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA), if applicable are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

KNB has two AAs, the Columbus MSA AA and OH Non-MSA AA, as described above under the "Description of Institution" section. The OCC completed a full-scope review for each AA. A description of the AAs is provided in the "Description of Institution's Operations in Ohio" section of this PE.

Ratings

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings. Unless otherwise noted, examiners placed more weight on the OH Non-MSA. The MMSA rating and state ratings in rating areas with a single AA are based on performance in that AA. The MMSA and state ratings in rating areas with multiple AAs are based on the weighted-average conclusions in those 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) (March 29, 2024) in determining a national banks or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

State Rating

State of Ohio

CRA rating for the State of Ohio: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The bank exhibits a reasonable distribution of loans to individuals of different incomes and businesses and farms of different sizes.
- KNB exhibits a reasonable geographic distribution of loans in the AAs.
- The bank has not received any complaints about its CRA performance in helping to meet the AAs' credit needs during the evaluation period.
- The bank's responsiveness to CD needs of the AAs through CD lending, services, and donations is adequate.

Description of Institution's Operations in Ohio

KNB designated two AAs in the state of Ohio. As of the 2020 U.S. Census, the Columbus MSA included 21 CTs, which included all of Pickaway County, Ohio, four CTs in Fairfield County, Ohio, and one CT in Hocking County, Ohio. The OH Non-MSA included 17 CTs, which included all of Ross County, Ohio. Bank management selected the AAs based on its targeted lending areas, deposits, and branch locations. The bank is headquartered in Ross County in the OH Non-MSA.

The bank offers traditional banking products with a focus on home mortgage, business, and farm lending within the AAs, but also offer consumer loans. Deposit operations function in a traditional manner with most deposits obtained by bank personnel located in physical offices. Deposit market share in the Columbus MSA was low but was adequately served by other financial institutions. Competition from large banks in the Columbus MSA is substantial. Deposit market share in the OH Non-MSA is high due to the bank having the largest market share in the AA.

Columbus MSA

The following information regarding demographic data, affordable housing cost, job market and economic conditions, competition, and community contacts/credit needs provides additional performance context for the bank's operations in the Columbus MSA. The tables below provide a summary of demographic data for the AA.

Assessment Area(s) - Columbus, OH MSA 2023						
2022 - 2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	21	4.76	33.33	47.62	9.52	4.76
Population by Geography	75,430	3.69	29.40	47.69	14.59	4.63
Housing Units by Geography	28,113	4.67	33.53	49.50	12.31	0.00
Owner-Occupied Housing by Geography	19,513	2.20	28.65	53.90	15.25	0.00
Occupied Rental Units by Geography	6,232	12.03	45.19	39.04	3.74	0.00
Vacant Units by Geography	2,368	5.57	43.07	40.71	10.64	0.00
Businesses by Geography	2,040	5.44	33.43	47.89	13.04	0.20
Farms by Geography	235	1.28	26.81	58.72	12.77	0.43
Family Distribution by Income Level	18,730	24.24	20.30	22.54	32.92	0.00
Household Distribution by Income Level	25,745	24.19	17.92	19.90	37.99	0.00
Unemployment rate (%)	4.34	7.13	6.97	2.99	3.33	0.00
Households Below Poverty Level (%)	12.84	38.98	15.51	10.24	6.70	0.00
Median Family Income (18140 - Columbus, OH MSA)		\$84,088		Median Housing Value		\$170,400
Median Family Income (18140 - Columbus, OH MSA) for 2023		\$100,900		Median Gross Rent		\$839
				Families Below Poverty Level		9.18
FFIEC File - 2020 Census						
2023 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Assessment Area(s) - Columbus, OH MSA 2024						
2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	21	4.76	33.33	47.62	9.52	4.76
Population by Geography	75,430	3.69	29.40	47.69	14.59	4.63
Housing Units by Geography	28,113	4.67	33.53	49.50	12.31	0.00
Owner-Occupied Housing by Geography	19,513	2.20	28.65	53.90	15.25	0.00
Occupied Rental Units by Geography	6,232	12.03	45.19	39.04	3.74	0.00
Vacant Units by Geography	2,368	5.57	43.07	40.71	10.64	0.00
Businesses by Geography	2,108	5.41	33.06	48.67	12.67	0.19
Farms by Geography	238	1.68	28.15	56.30	13.45	0.42
Family Distribution by Income Level	18,730	24.24	20.30	22.54	32.92	0.00
Household Distribution by Income Level	25,745	24.19	17.92	19.90	37.99	0.00
Unemployment rate (%)	4.34	7.13	6.97	2.99	3.33	0.00
Households Below Poverty Level (%)	12.84	38.98	15.51	10.24	6.70	0.00
Median Family Income (18140 - Columbus, OH MSA)		\$84,088		Median Housing Value		\$170,400
Median Family Income (18140 - Columbus, OH MSA) for 2024		\$103,300		Median Gross Rent		\$839
				Families Below Poverty Level		9.18
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Demographic Data

As of the 2020 U.S. Census data in the tables above, the population of the AA was 75,430, with 3.7 percent living in low-income CTs, 29.4 percent living in moderate-income CTs, 47.7 percent living in middle-income CTs, 14.6 percent living in upper-income CTs, and 4.6 percent in CTs that have not been assigned an income classification. The AA included 18,730 families and 25,745 households.

Affordable Housing

Examiners considered the poverty level across the AA in the evaluation of lending performance. Families and households living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial capacity to qualify for a home mortgage loan than those with income above the poverty level. For the OH Non-MSA, the percentage of families below poverty level was 9.2 percent as noted in the above 2024 table. The percentage of households below poverty was 12.8 percent.

Assuming a 30-year mortgage with a 6 percent interest rate, and not accounting for down payment, homeowners' insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$51,650 per year (or less than 50 percent of the 2024 Federal Financial Institutions Examination Council (FFIEC) adjusted median family income in the AA) could afford a \$215,370 mortgage with a payment of \$1,291 per month. The estimated mortgage payment based on home listing data within the Columbus MSA is \$1,876, illustrating that low-income borrowers would be challenged to qualify for a mortgage loan in the AA. This limits the bank's opportunities to lend to low-income borrowers. The median housing value in the AA was \$267,755 at the beginning of the evaluation period and \$387,730 at the end of the evaluation period, reflecting a 44.8 percent change from 2022 to 2024 according to Realtor.com.

Job Market and Economic Conditions

Economic conditions in the AA were relatively stable over the review period. According to the U.S. Bureau of Labor Statistics, the average annual unemployment rates in the AA fluctuated over the review period. The average annual unemployment rates of Pickaway County and Fairfield County were lower than the Ohio unemployment rate, while Hocking County's unemployment rate was slightly above the Ohio average. The following table summarizes the unemployment rates within the bank's AA.

Average Annual Unemployment Rates			
	2022	2023	2024
State of Ohio	4.0	3.7	4.3
Columbus MSA – Pickaway	3.7	3.4	4.1
Columbus MSA – Fairfield	3.5	3.3	4.0
Columbus MSA – Hocking	4.2	3.9	4.6

Source: U.S. Bureau of Labor Statistics; Rates Not Seasonally Adjusted.

The AA had a diverse mix of companies across many different industries. Primary employment sectors included manufacturing, chemicals, and agriculture. Significant employers in the AA included DuPont, PPG, Sofidel, and Georgia-Pacific. According to Moody's Analytics Report dated June 2025, the Columbus MSA labor market has rebounded, and the economy is expected to outperform the average economic performance of the State of Ohio.

Competition

Competition in the Columbus MSA is substantial and includes a diverse mix of community banks, state banks, and branches of large banks. According to the June 30, 2024, Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, there were 54 financial institutions competing in the Columbus MSA, with 480 banking offices. KNB had the 28th highest market share, at 0.2 percent and

\$174.9 million in deposits. This accounted for 34.3 percent of the bank’s total deposits as of June 30, 2024. The top five financial institutions with significant deposit activity in the area include Huntington National Bank, JPMorgan Chase Bank, N.A., Fifth Third Bank, N.A., PNC Bank, N.A., and Park National Bank, with a combined deposit market share of 82.3 percent.

Strong competition for home mortgage lending exists in the Columbus MSA, which is one of KNB’s primary products. For 2024, which is the most recent peer mortgage market share data available, KNB ranked 20th in mortgage lending market share (HMDA reporters only) in the AA with 1.6 percent. The top five lenders included Pennymac Loan Services, Huntington National Bank, Rocket Mortgage, Freedom Mortgage Corporation, and U.S. Bank, N.A. Combined, the top five mortgage lenders in the AA held 22.2 percent of the market share. In total, there were 201 mortgage lenders in the AA in 2024.

Community Contacts/Credit Needs

As part of this CRA PE, the OCC reviewed information provided from an interview with a representative from a community action organization. The organization indicated they have a familiar relationship with some of the banks in the service area. The community contact identified affordable housing, childcare, and reliable transportation as primary needs of the service area. In general, local financial institutions are adequately meeting the credit and CD needs of the community.

OH Non-MSA

The following information regarding demographic data, affordable housing cost, job market and economic conditions, competition, and community contacts/credit needs provides additional performance context for the bank’s operations in the OH Non-MSA. The tables below provide a summary of demographic data for the AA.

Assessment Area(s) - OH Non-MSA 2023						
2022 - 2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	17	0.00	23.53	58.82	17.65	0.00
Population by Geography	77,093	0.00	18.88	62.75	18.37	0.00
Housing Units by Geography	32,060	0.00	20.70	59.18	20.12	0.00
Owner-Occupied Housing by Geography	20,670	0.00	15.26	63.79	20.95	0.00
Occupied Rental Units by Geography	8,410	0.00	32.16	50.23	17.61	0.00
Vacant Units by Geography	2,980	0.00	26.04	52.48	21.48	0.00
Businesses by Geography	2,109	0.00	36.89	45.90	17.21	0.00
Farms by Geography	154	0.00	9.74	77.27	12.99	0.00
Family Distribution by Income Level	19,010	22.86	17.77	20.33	39.04	0.00
Household Distribution by Income Level	29,080	26.39	15.75	17.37	40.49	0.00
Unemployment rate (%)	6.02	0.00	9.98	5.89	2.82	0.00
Households Below Poverty Level (%)	15.26	0.00	22.27	12.58	16.25	0.00
Median Family Income (Non-MSAs - OH)		\$66,684		Median Housing Value		\$134,200
Median Family Income (Non-MSAs - OH) for 2023		\$79,500		Median Gross Rent		\$752
				Families Below Poverty Level		11.39

FFIEC File - 2020 Census
 2023 Dun & Bradstreet SBSF Demographics
 Due to rounding, totals may not equal 100.0%
 (*) The NA category consists of geographies that have not been assigned an income classification

Assessment Area(s) - OH Non-MSA 2024						
						2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	17	0.00	23.53	58.82	17.65	0.00
Population by Geography	77,093	0.00	18.88	62.75	18.37	0.00
Housing Units by Geography	32,060	0.00	20.70	59.18	20.12	0.00
Owner-Occupied Housing by Geography	20,670	0.00	15.26	63.79	20.95	0.00
Occupied Rental Units by Geography	8,410	0.00	32.16	50.23	17.61	0.00
Vacant Units by Geography	2,980	0.00	26.04	52.48	21.48	0.00
Businesses by Geography	2,165	0.00	36.81	46.19	17.00	0.00
Farms by Geography	157	0.00	10.19	77.07	12.74	0.00
Family Distribution by Income Level	19,010	22.69	17.59	20.26	39.46	0.00
Household Distribution by Income Level	29,080	26.44	15.76	17.37	40.43	0.00
Unemployment rate (%)	6.02	0.00	9.98	5.89	2.82	0.00
Households Below Poverty Level (%)	15.26	0.00	22.27	12.58	16.25	0.00
Median Family Income (Non-MSAs - OH)		\$66,160			Median Housing Value	\$134,200
Median Family Income (Non-MSAs - OH) for 2024		\$81,600			Median Gross Rent	\$752
					Families Below Poverty Level	11.39
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Demographic Data

As of the 2024 U.S. Census data in the table above, the population in the OH Non-MSA was 77,093 with 18.9 percent living in moderate-income CTs, 62.8 in middle-income CTs, and 18.4 percent in upper-income CTs. There are no low-income CTs in the AA. The AA consists of 17 CTs, and was comprised of four moderate-income CTs, 10 middle-income CTs, and three upper-income CTs. The AA included 19,010 families and 29,080 households.

Affordable Housing

Examiners considered the poverty level across the AA in the evaluation of lending performance. Families and households living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial capacity to qualify for a home mortgage loan than those with income above the poverty level. For the OH Non-MSA, the percentage of families below poverty level was 11.4 percent as noted in the above 2024 table. The percentage of households below poverty was 15.3 percent.

Assuming a 30-year mortgage with a 6 percent interest rate, and not accounting for down payment, homeowners' insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$40,800 per year (or less than 50 percent of the 2024 FFIEC adjusted median family income in the AA) could afford a \$170,127 mortgage with a payment of \$1,020 per month. A moderate-income borrower making \$65,280 per year (or less than 80 percent of the 2023 FFIEC adjusted median family income in the AA) could afford a \$272,204 mortgage with a payment of \$1,632 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated monthly payment of \$1,365 based on the average list price of housing for each county in the AA. The median housing value in the AA was \$179,900 at the beginning of the evaluation period and \$254,200 at the end of the evaluation period, reflecting a 41.3 percent change from 2022 to 2024 according to Realtor.com.

Job Market and Economic Conditions

According to the U.S. Bureau of Labor Statistics, the average annual unemployment rates for Ross County gradually declined from 2022 to 2023 but increased in 2024. The average annual unemployment rate was slightly higher than the state of Ohio and national unemployment rates.

Average Annual Unemployment Rates			
	2022	2023	2024
State of Ohio	4.0	3.7	4.3
United States	3.7	3.6	4.1
OH Non-MSA Ross County	4.1	3.8	4.6

Source: U.S. Bureau of Labor Statistics; Rates Not Seasonally Adjusted.

The AA had a diverse mix of companies across many industries with a significant presence of manufacturing, trade, and utilities. Large employers in the OH Non-MSA included Kenworth, Adena Health System, Dayton Power & Light, and Herr Foods Inc.

Competition

Competition for deposits in the OH Non-MSA was weak with 10 total FDIC insured financial institutions operating 18 offices in Ross County. According to the FDIC Market Share Report as of June 30, 2024, Kingston NB had \$335.4 million in deposits in the OH Non-MSA, which comprised 65.7 percent of total bank deposits. The bank had a deposit market share of 28 percent and was ranked first out of 10 financial institutions. The top competitors in the AA were The Vinton County National Bank with three branches and a 15.2 percent market share, Huntington National Bank with two branches and a 14 percent market share, PNC Bank with one branch and a 11.8 percent market share, and LCNB National Bank with three branches and a 11.4 percent market share.

One of the bank's primary business products in the OH Non-MSA was home mortgage lending. There was strong competition for home mortgage loans during the evaluation period. Based on the 2024 Peer Mortgage Data, the bank ranked ninth out of 154 lenders in the OH Non-MSA in residential home mortgage lending. KNB had 3.1 percent of the lending market share at 46, with a volume of approximately \$8.3 million. The top mortgage lenders in the OH Non-MSA included Guaranteed Rate, Inc. with a 10.4 percent market share, Vinton County National Bank with an 8.2 percent market share, Huntington National Bank with a 5.6 percent market share, and U.S. Bank, N.A. with a 4.3 percent market share. During the evaluation period, 52 percent of the bank's home mortgage loan originations and purchases inside the AA were in the OH Non-MSA.

Community Contacts/Credit Needs

The OCC reviewed information provided from an interview with a community contact that was conducted during the evaluation period to understand the OH Non-MSA's needs and opportunities. The contact was from a social service organization. The representative noted that affordable housing continues to be a need in the area. They stated that post-COVID rent has increased throughout the county, and some areas have doubled. Rental inventory is low and there are not many upscale market-rate apartments that middle-income renters can afford, resulting in them not moving out of apartments that lower-income renters could afford.

Scope of Evaluation in Ohio

Examiners performed a full-scope review of both AAs, the Columbus MSA and OH Non-MSA. The data in the AAs was analyzed and presented as two AAs for the purposes of this evaluation. Home mortgage, small business (small loans to businesses), and small farm (small loans to farms) loans were the bank's primary lending products during the evaluation period. The OCC gave equal consideration to home mortgage, business, and farm lending during the review period.

The OH Non-MSA represented the largest concentration of deposit activities. Unless otherwise noted, examiners placed more weight on the OH Non-MSA and performance in 2022 – 2023 as it represented the only information that has both demographic and aggregate data available for comparison. Examiners used 2022, 2023, and 2024 loan data for the lending analysis, as discussed above. Refer to the "Scope of Evaluation" section above for more details.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO

LENDING TEST

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

Conclusions for Areas Receiving a Full-Scope Review

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

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

The geographic distribution of home mortgage loans is reasonable.

Columbus MSA

The geographic distribution of home mortgage loans in the Columbus MSA was reasonable.

2022-2023

The percentage of home mortgage loans in low-income geographies was near to both the percentage of owner-occupied (OO) housing units located in those geographies and the aggregate percentage of all reporting lenders (HMDA aggregate data). The percentage of home mortgage loans in moderate-income geographies exceeded both the percentage of OO housing units located in those geographies and the aggregate percentage of all reporting lenders.

2024

The bank did not originate any home mortgage loans in low-income geographies during this time. The percentage of home mortgage loans in moderate-income geographies was below both the percentage of OO housing units located in those geographies and the aggregate percentage of all reporting lenders.

OH Non-MSA

The geographic distribution of home mortgage loans in the OH Non-MSA was reasonable.

2022 – 2023

The percentage of home mortgage loans in moderate-income geographies was near to both the percentage of OO housing units located in those geographies and the aggregate percentage of all reporting lenders.

2024

The percentage of home mortgage loans in moderate-income geographies exceeded both the percentage of OO housing units located in those geographies and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table 9 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 geographic distribution of loans to small businesses is reasonable.

Columbus MSA

The geographic distribution of loans to small businesses in the Columbus MSA was reasonable. The AA has a limited amount of LMI CTs. Competition in the AA is high, including multiple large banks. Rising interest rates caused a slowing of loans originated across the bank's loan products.

2022 - 2023

The percentage of loans to small businesses in low-income geographies was below the percentage of businesses located in those geographies but exceeded the aggregate percentage of all reporting lenders. The percentage of loans to small businesses in moderate-income geographies was significantly below the percentage of businesses located in those geographies and well below the aggregate percentage of all reporting lenders.

2024

The bank did not originate any loans to small businesses in low-income geographies during this time. The percentage of loans to small businesses in moderate-income geographies exceeded the percentage of businesses located in those geographies.

OH Non-MSA

The geographic distribution of loans to small businesses in the OH Non-MSA was poor.

2022 - 2023

The percentage of loans to small businesses in moderate-income geographies was significantly below the percentage of businesses located in those geographies and below the aggregate percentage of all reporting lenders.

2024

The percentage of loans to small businesses in moderate-income geographies was below the percentage of businesses located in those geographies.

Small Loans to Farms

Refer to Table 11 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 geographic distribution of loans to small farms is reasonable.

Columbus MSA

The geographic distribution of loans to small farms in the Columbus MSA was reasonable. Loan competition is high, including multiple large banks. Rising interest rates caused a slowing of loans originated across the bank's loan products.

2022 - 2023

The bank did not originate any loans to small farms in low-income geographies during this time; however, only 1.97 percent of farms are located in low-income CTs in the AA. The percentage of loans to small farms in moderate-income geographies was well below the percentage of farms located in those geographies and below the aggregate percentage of all reporting lenders.

2024

The bank did not originate any loans to small farms in low-income geographies during this time; however, only 1.68 percent of farms are located in low-income CTs in the AA. The percentage of loans to small farms in moderate-income geographies exceeded the percentage of farms located in those geographies.

OH Non-MSA

The geographic distribution of loans to small farms in the OH Non-MSA is poor. Loan competition is high in the AA and rising interest rates caused a slowing of loans originated during this time.

2022 - 2023

The percentage of loans to small farms in moderate-income geographies was below the percentage of farms located in those geographies and significantly below the aggregate percentage of all reporting lenders.

2024

The bank did not originate any loans to small farms in moderate-income geographies during this time.

Lending Gap Analysis

The OCC reviewed summary reports and maps and analyzed the bank's home mortgage, business (loans to small businesses), and farm (loans to small farms) lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. The OCC did not identify any unexplained conspicuous gaps in the bank's AAs, given performance context considerations.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

The distribution of home mortgage loans among borrowers of different income levels is reasonable.

Columbus MSA

The distribution of home mortgage loans among individuals of different income levels in the Columbus MSA was reasonable. The AA has a limited amount of LMI CTs, and competition is high, including multiple large banks.

2022 - 2023

The percentage of home mortgage loans to low-income borrowers was well below the percentage of families but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers was below both the percentage of families and the aggregate percentage of all reporting lenders.

2024

The percentage of home mortgage loans to low-income borrowers was well below the percentage of families but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers approximated the percentage of families and was near to the aggregate percentage of all reporting lenders.

OH Non-MSA

The distribution of home mortgage loans among individuals of different income levels in the OH Non-MSA was poor.

2022 - 2023

The percentage of home mortgage loans to low-income borrowers was significantly below the percentage of families but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers was below the percentage of families and the aggregate percentage of all reporting lenders.

2024

The percentage of home mortgage loans to low-income borrowers was significantly below the percentage of families and below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers was well below both the percentage of families and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table 10 in the state of Ohio 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 distribution of loans to small businesses is reasonable.

Columbus MSA

The distribution of loans to small businesses in the Columbus MSA is reasonable.

2022 - 2023

The percentage of loans to small businesses with revenues of \$1 million or less was below the percentage of businesses with revenues of \$1 million or less but exceeded the aggregate percentage of all reporting lenders.

2024

The percentage of loans to small businesses with revenues of \$1 million or less was below the percentage of businesses with revenues of \$1 million or less.

OH Non-MSA

The distribution of loans to small businesses in the OH Non-MSA was reasonable.

2022 – 2023

The percentage of loans to small businesses with gross annual revenue of \$1 million or less approximated the percentage of small businesses with gross annual revenue of \$1 million or less and exceeded the aggregate percentage of all reporting lenders.

2024

The percentage of loans to small businesses with gross annual revenue of \$1 million or less was below the percentage of small businesses with gross annual revenue of \$1 million or less.

Small Loans to Farms

Refer to Table 12 in the state of Ohio 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 distribution of loans to small farms is reasonable.

Columbus MSA

The distribution of loans to small farms in the Columbus MSA is reasonable.

2022 - 2023

The percentage of loans to small farms with gross annual revenues of \$1 million or less was below the percentage of small farms with revenues of \$1 million or less but exceeded the aggregate percentage of all reporting lenders.

2024

The percentage of loans to small farms with gross annual revenues of \$1 million or less was below the percentage of small farms with revenues of \$1 million or less.

OH Non-MSA

The distribution of loans to small farms in the OH Non-MSA is reasonable.

2022 – 2023

The percentage of loans to small farms with gross annual revenues of \$1 million or less exceeded both the percentage of small farms with revenues of \$1 million or less and the aggregate percentage of all reporting lenders.

2024

The percentage of loans to small farms with gross annual revenues of \$1 million or less was below the percentage of small farms with revenues of \$1 million or less.

Responses to Complaints

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

COMMUNITY DEVELOPMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Community Development Loans

During the evaluation period, KNB originated a total of five qualified CD loans totaling \$2.9 million or 5.9 percent of tier 1 capital as of December 31, 2024. These loans were responsive to CD needs for supporting area businesses and LMI families. All five loans were originated to a business that provides jobs for LMI individuals and services that benefit LMI families.

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

Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Columbus MSA	2	40.00	\$2,530	85.82
OH Non-MSA	3	60.00	\$418	14.18
Total	5	100.00	\$2,948	100.00

Columbus MSA

During the evaluation period, KNB originated two qualified CD loans totaling \$2.5 million, which represented 14.8 percent of allocated tier 1 capital as of December 31, 2024, based on deposits. The CD loans originated by the bank in this AA included the following:

- Two loans totaling \$2.5 million with the purpose of building a new store that primarily serves LMI families and hires LMI individuals.

OH Non-MSA

During the evaluation period, KNB originated three qualified CD loans totaling \$418,000 which represented 1.3 percent of allocated tier 1 capital as of December 31, 2024, based on deposits. The following are examples of CD loans the bank originated in this AA:

- Two loans totaling \$268,000 to an organization for purchasing vans with wheelchair seats that provide transportation to disabled individuals.
- One revolving line of credit totaling \$150,000 to an organization that provides afterschool programs that benefit LMI children.

Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Columbus MSA	0	\$0	38	\$45	38	66.7	\$45	69.2	0	\$0
OH Non-MSA	0	\$0	19	\$20	19	33.3	\$20	30.8	0	\$0
Total	0	\$0	57	\$65	57	100.0	\$65	100.0	0	\$0

The Qualified Investment Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified investments (CD donations). These tables include all qualified investments, including prior period investments that remain outstanding as of December 31, 2024.

During the evaluation period, KNB made 57 qualified CD donations totaling \$65,000 or 0.13 percent of total tier 1 capital as of December 31, 2024. Current donations were responsive to CD needs for community services and economic development targeted toward LMI individuals and families.

Columbus MSA

KNB made 38 donations to 19 different CD organizations, totaling \$45,366, or 0.3 percent of allocated tier 1 capital as of December 31, 2024, based on deposits. The bank made donations to organizations that serve LMI individuals such as food pantries and shelters. Several donations were made to organizations that focus on economic development in LMI geographies. Overall, the bank provided donations ranging in size from \$100 to \$10,000 to a variety of CD organizations throughout the AA.

OH Non-MSA

KNB made 19 donations to 10 different CD organizations, totaling \$20,225, or 0.06 percent of allocated tier 1 capital as of December 31, 2024, based on deposits. The bank made donations to organizations that serve LMI individuals such as food pantries and shelters. Several donations were made to organizations that focus on economic development in LMI geographies. Overall, the bank provided donations ranging in size from \$100 to \$3,000 to a variety of CD organizations throughout the AA.

Extent to Which the Bank Provides Community Development Services

During the evaluation period, nine KNB employees provided qualified CD services in the AA to 14 different organizations. Leadership was evident as the employees primarily served in a role such as a board or committee member for a variety of organizations that focus on economic development, financial literacy, affordable housing, or other community services targeted to LMI individuals. The bank's assistance was responsive to identified needs in the AAs.

As of December 31, 2024, KNB had two branches in moderate-income geographies, the South Bloomfield branch and the Circleville branch, both in the Columbus MSA.

Columbus MSA

Within the AA, seven bank employees served as a board/committee member or a volunteer for five unique CD organizations. The qualified organizations provided community services for LMI individuals and geographies, including youth programs and other community services. For example, employees served on the board of organizations that focus on economic development in LMI geographies. Employees also volunteered to provide financial literacy education to LMI youth in the AA.

OH Non-MSA

Within the AA, four bank employees served as board members for a qualifying organization that provides financial literacy and affordable housing in Ross County. The employees participated in board and committee meetings throughout the evaluation period for this organization. The bank has one branch located in Ross County.

Appendix A: Scope of Examination

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

Time Period Reviewed:	1/1/2022 – 12/31/2024	
Bank Products Reviewed:	Home mortgage, small business, small farm CD loans, CD services, and CD donations	
Affiliate(s)	Affiliate Relationship	Products Reviewed
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Ohio		
Columbus MSA	Full-scope	Includes all of Pickaway County, CTs 0325.01, 0325.02, 0326.01, and 0326.02 in Fairfield County, and CT 9650.00 in Hocking County
OH Non-MSA	Full-scope	Includes all of Ross County

Appendix B: Summary of MMSA and State Ratings

RATINGS			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Kingston National Bank	Satisfactory	Satisfactory	Satisfactory
State:			
Ohio	Satisfactory	Satisfactory	Satisfactory

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved 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 low- and moderate-income areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

- Table 7. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table 8. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/AA. The table also presents aggregate peer data for the years the data is available.
- Table 9. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** – Compares 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 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 AA.
- Table 10. 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.

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.

Table 11. Assessment Area Distribution of Loans to Farms by Income Category of the Geography – Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s AA.

Table 12. 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 \$500,000) 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.

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2023		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate		
Columbus, OH MSA 2023	99	20,743	42.67	4,965	2.20	2.02	2.58	28.65	31.31	28.98	53.90	56.57	44.83	15.25	10.10	23.59	--	--	0.02		
OH Non-MSA 2023	133	22,249	57.33	3,194	--	--	--	15.26	15.04	15.15	63.79	69.92	60.58	20.95	15.04	24.26	--	--	--		
Total	232	42,992	100.00	8,159	1.07	0.86	1.57	21.76	21.98	23.57	58.99	64.22	51.00	18.18	12.93	23.85	--	--	0.01		

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2024		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate		
Columbus, OH MSA 2024	39	7,443	45.88	2,466	2.20	--	3.04	28.65	25.64	31.87	53.90	71.79	45.58	15.25	2.56	19.51	--	--	--		
OH Non-MSA 2024	46	8,210	54.12	1,470	--	--	--	15.26	19.57	18.10	63.79	56.52	58.50	20.95	23.91	23.40	--	--	--		
Total	85	15,653	100.00	3,936	1.07	--	1.91	21.76	22.35	26.73	58.99	63.53	50.41	18.18	14.12	20.96	--	--	--		

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

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.

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Columbus, OH MSA 2023	99	20,743	42.67	4,965	24.24	10.10	8.36	20.30	16.16	22.76	22.54	22.22	25.10	32.92	39.39	27.15	--	12.12	16.64
OH Non-MSA 2023	133	22,249	57.33	3,194	22.86	7.52	7.20	17.77	14.29	21.51	20.33	26.32	25.30	39.04	39.85	29.93	--	12.03	16.06
Total	232	42,992	100.00	8,159	23.55	8.62	7.91	19.03	15.09	22.27	21.42	24.57	25.17	36.00	39.66	28.24	--	12.07	16.41

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Columbus, OH MSA 2024	39	7,443	45.88	2,466	24.24	7.69	6.77	20.30	20.51	21.21	22.54	12.82	24.53	32.92	35.90	26.52	--	23.08	20.97
OH Non-MSA 2024	46	8,210	54.12	1,470	22.69	4.35	7.35	17.59	10.87	20.34	20.26	21.74	24.83	39.46	43.48	28.91	--	19.57	18.57
Total	85	15,653	100.00	3,936	23.46	5.88	7.06	18.93	15.29	20.78	21.39	17.65	24.68	36.21	40.00	27.72	--	21.18	19.77

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

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Columbus, OH MSA 2023	39	6,018	50.65	1,914	7.32	5.13	3.08	39.52	7.69	25.76	44.55	82.05	55.54	8.36	5.13	15.65	0.25	--	--
OH Non-MSA 2023	38	9,162	49.35	1,451	--	--	--	40.31	21.05	26.81	44.15	55.26	51.69	15.54	23.68	21.50	--	--	--
Total	77	15,180	100.00	3,365	3.24	2.59	1.75	39.96	14.29	26.21	44.33	68.83	53.88	12.36	14.29	18.16	0.11	--	--

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

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Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Columbus, OH MSA 2024	21	3,201	51.16	--	5.41	--	--	33.06	38.10	--	48.67	57.14	--	12.67	4.76	--	0.19	--	--
OH Non-MSA 2024	22	6,133	48.84	--	--	--	--	36.81	27.27	--	46.19	68.18	--	17.00	4.55	--	--	--	--
Total	43	9,334	100.00	--	2.67	--	--	34.96	32.56	--	47.41	62.79	--	14.86	4.56	--	0.09	--	--

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Columbus, OH MSA 2023	38	6,018	50.65	1,914	81.57	76.92	57.89	7.84	23.08	10.59	--
OH Non-MSA 2023	38	9,162	49.35	1,451	76.01	76.32	61.27	10.48	23.68	13.51	--
Total	76	15,180	100.00	3,365	78.74	75.32	59.35	9.18	23.38	12.08	--

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Columbus, OH MSA 2024	21	3,201	48.84	--	81.78	71.43	--	7.21	28.57	11.01	--
OH Non-MSA 2024	22	6,133	51.16	--	75.75	68.18	--	10.21	31.82	14.04	--
Total	43	9,334	100.00	--	78.73	69.77	--	8.73	30.23	12.54	--

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

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Assessment Area:	Total Loans to Farm				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate
Columbus, OH MSA 2023	40	10,538	50.00	161	1.97	0.00	--	35.21	20.00	27.95	54.08	60.00	57.14	8.45	20.00	14.91	0.28	--	--
OH Non-MSA 2023	40	3,141	50.00	77	--	--	--	10.96	7.50	16.88	79.45	90.00	54.55	9.59	2.50	28.57	--	--	--
Total	80	13,679	100.00	238	1.08	--	--	24.27	13.75	24.37	65.53	75.00	56.30	8.96	11.25	19.33	0.15	--	--

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Loans to Farm				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate
Columbus, OH MSA 2024	20	10,538	50.00	--	1.68	--	--	28.15	40.00	--	56.30	50.00	--	13.45	10.00	--	0.42	--	--
OH Non-MSA 2024	20	3,157	50.00	--	--	--	--	10.19	--	--	77.07	95.00	--	12.74	5.00	--	--	--	--
Total	40	13,695	100.00	--	1.01	--	--	21.01	20.00	--	64.56	72.50	--	13.16	7.50	--	0.25	--	--

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Columbus, OH MSA 2023	40	10,538	50.00	161	88.09	72.50	37.27	11.06	27.50	0.85	--
OH Non-MSA 2023	40	3,141	50.00	77	88.96	92.50	37.66	10.39	7.50	0.65	--
Total	80	13,679	100.00	238	88.43	82.50	37.39	10.80	17.50	0.77	--

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

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Table 12: Assessment Area Distribution of Loans to Farms by Gross Annual Revenue											2024
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Columbus, OH MSA 2024	20	10,538	50.00	--	88.24	65.00	--	10.92	35.00	0.84	--
OH Non-MSA 2024	20	3,157	50.00	--	89.81	70.00	--	9.55	30.00	0.64	--
Total	20	13,695	100.00	--	88.86	67.50	--	10.38	32.50	0.76	--

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

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.