



PUBLIC DISCLOSURE

May 6, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Vinton County National Bank
Charter Number 2036

112 West Main Street
McArthur, OH 45651

Office of the Comptroller of the Currency

655 Metro Place South, Suite 625
Dublin, OH 43017

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

Table of Contents

Overall CRA Rating.....	1
Description of Institution	2
Scope of the Evaluation	3
Discriminatory or Other Illegal Credit Practices Review	4
State Rating.....	5
State of Ohio	5
Community Development Test.....	18
Appendix A: Scope of Examination	A-1
Appendix B: Summary of MMSA and State Ratings.....	B-1
Appendix C: Definitions and Common Abbreviations.....	C-1
Appendix D: Tables of Performance Data.....	D-1

Overall CRA Rating

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

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Outstanding.

The major factors that support this rating include:

- The Lending Test rating is based on satisfactory performance in the state of Ohio. Vinton County National Bank (VCNB or bank) exhibits a reasonable distribution of loans among borrowers and geographies of different income levels.
- The Community Development (CD) Test rating is based on excellent performance in the state of Ohio. VCNB demonstrates excellent responsiveness to CD needs in its AAs by engaging in a combination of CD loans, qualified investments, and CD services.
- VCNB's loan-to-deposit (LTD) ratio is reasonable, and the substantial majority of loans are made in its assessment areas (AAs).

Loan-to-Deposit Ratio

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

As calculated on a bank-wide basis, VCNB's quarterly LTD ratio averaged 73.7 percent over the 13-quarter period ending December 31, 2023. During this timeframe, the LTD ratio trended upward and ranged from a low of 67.5 percent as of March 31, 2022, to a high of 78.9 percent as of December 31, 2023. VCNB's ratio is below the average LTD ratio of the ten other banks with total assets of less than \$2.1 billion and headquartered in the AAs. The LTD ratio of these ten banks ranged from 54.9 percent to 107.6 percent with an average ratio of 84.9 percent.

Lending in Assessment Area

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

By number, the bank originated 86.1 percent of its total loans inside the AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	1,822	86.2	291	13.8	2,113	336,804	85.9	55,100	14.1	391,904
Consumer	48	80.0	12	20.0	60	952	77.3	280	22.7	1,232
Total	1,870	86.1	303	13.9	2,173	337,756	85.9	55,380	14.1	393,136

*Source: 01/01/21-12/31/23 Bank Data.
Due to rounding, totals may not equal 100.0%*

Description of Institution

VCNB is a federally chartered national bank that is wholly owned by Community Bancshares, Inc, a one bank holding company. Both entities are headquartered in McArthur, Ohio, approximately 70 miles southeast of Columbus, Ohio. The bank did not engage in any merger or acquisition activity during the evaluation period.

VCNB operates 16 offices and 19 automated teller machines (ATMs) throughout eight counties in southeast and central Ohio. In addition to the main office in McArthur, Ohio, VCNB has branch offices in Grove City, Canal Winchester, Bremen, Lancaster, Logan, Jackson, Pataskala, Ashville, Circleville, Commercial Point, Chillicothe, Richmond Dale, and Laurelville. ATMs are available at each office as well as three non-banking locations in Amanda, Laurelville, and Wilkesville. Given this market footprint, VCNB has one rating area, the state of Ohio, and two AAs, the Columbus metropolitan statistical area AA (Columbus MSA) and the Ohio nonmetropolitan statistical area AA (Ohio Non-MSA).

As a locally owned community bank, VCNB offers a variety of loan products, deposit accounts, and other financial services for personal or business banking needs. Loan products include various types of home mortgage loans, consumer loans, credit cards, business loans, and agricultural loans. Deposit account options consist of checking and savings accounts, money market accounts, certificates of deposit, health savings accounts, individual retirement accounts, and Christmas club accounts. Other available services include overdraft solutions, wire transfers, merchant services, remote deposit capture, safe deposit boxes, online and mobile banking, and Certificate of Deposit Account Registry Service (CDARS) program.

As of December 31, 2023, VCNB had total assets of \$1.4 billion, total deposits of \$1.2 billion, and tier one capital of \$142.5 million. Gross loans and leases of \$981.4 million represented 70.2 percent of total assets. The loan portfolio consisted of residential real estate loans (44.2 percent), consumer loans (27.4 percent), business loans (25.3 percent), farm loans (1.5 percent), and other loans (1.6 percent). Consumer and home mortgage loans also comprised most of the loans originated during the evaluation period. Consumer loans accounted for 75 percent by number and 44.3 percent by dollar amount. Home mortgage loans accounted for 13.4 percent by number and 30.5 percent by dollar amount. The notable consumer volume primarily results from VCNB's direct and indirect auto lending activity.

VCNB's lending activities are consistent with its size, expertise, financial capacity, and local economic conditions. There are no legal, financial, or other factors that affect its ability to help meet the needs of its AAs. VCNB received an Outstanding rating for its CRA performance during the prior evaluation period. This rating was reported in the Office of the Comptroller of the Currency's (OCC) CRA Performance Evaluation dated February 22, 2021.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This evaluation is based on VCNB's CRA performance from January 1, 2021, to December 31, 2023. The OCC assessed performance using Intermediate Small Bank examination procedures which include a Lending Test and CD Test. The Lending Test reflects evaluation of VCNB's record in meeting the credit needs for each AA through use of its primary loan products. The CD Test reflects evaluation of VCNB's responsiveness to the CD needs of its AAs through use of loans, qualified investments, and services with a CD purpose. As previously stated, consumer and home mortgage loans are considered VCNB's primary loan products based on the number and dollar amount of loans originated during the evaluation period. No affiliate activity is included.

To evaluate the bank's performance, the OCC relied on internal bank reports for consumer loans. In each AA, the OCC transaction tested at least 60 consumer loans originated or purchased during the evaluation period to analyze the bank's consumer loan performance. The OCC used Home Mortgage Disclosure Act (HMDA) data for years 2021, 2022, and 2023 to analyze the bank's home mortgage loan performance.

There were no MSA boundary changes introduced by the Office of Management and Budget that affected VCNB's AAs. However, the AAs were affected by the 2020 Census data update that resulted in changes to some census tract (CT) boundaries and/or the income designation of the CT. These changes became effective January 1, 2022. As a result, the analysis of geographic and borrower loan distributions consists of two time periods, 2021 and 2022-2023. The demographic data presented in this evaluation is either from the 2015 American Community Survey (ACS) for 2021 or the 2020 U.S. Census for 2022-2023. Unless otherwise noted, the OCC gave more weight to performance in 2022-2023 as it represented the largest portion of the evaluation period.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope.

VCNB has two AAs in Ohio, as described in the “Description of Institution” and “Description of Institution’s Operations in Ohio” sections of this evaluation. The OCC completed a full-scope review of both AAs. Refer to Appendix A, Scope of Examination, for a list of the AAs.

Ratings

The bank’s overall rating is a blend of the state ratings, and where applicable, multistate ratings. VCNB operates in a single state, so the overall rating reflects its performance in the state of Ohio. The rating for the state of Ohio is based on performance in both AAs, the Columbus MSA and Ohio Non-MSA. The OCC weighted the AAs equally. Even though VCNB has more offices and deposits in the Columbus MSA, its presence in the Ohio Non-MSA is important given its market share and limited number of other financial institutions operating in this area. In addition, the OCC placed more weight on consumer loans given the significant number and dollar amount originated during the review period. As stated above, the OCC gave more weight to performance to 2022-2023 as it represented the largest portion of the evaluation period. Refer to the “Scope of the Evaluation” section under the State of Ohio for more details.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c), in determining a national bank’s or federal savings association’s (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank’s lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the 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: Outstanding.

The major factors that support this rating include:

- a satisfactory distribution of loans among geographies and borrowers of different income levels;
- excellent responsiveness to CD needs through a combination of loans, qualified investments, and CD services;
- a substantial majority of loans originated or purchased inside the AAs; and,
- a reasonable LTD ratio.

Description of Institution's Operations in Ohio

As previously noted, VCNB continues to offer customers a variety of traditional loan and deposit products for personal or business needs. VCNB has 16 bank offices and 19 ATMs located in 16 cities among eight counties in southeast and central Ohio. Five of the counties (Fairfield, Franklin, Hocking, Licking, and Pickaway) are part of the Columbus, OH MSA and the other three counties (Jackson, Ross, and Vinton) are part of the Ohio Non-MSA. As such, the "original" bank-delineated AAs within the state of Ohio during the evaluation period were:

- Columbus MSA – All of Fairfield, Hocking, and Pickaway counties, and a portion of Franklin and Licking counties; and
- Ohio Non-MSA – All of Jackson, Ross, and Vinton counties.

For analysis purposes, the OCC adjusted the boundary of the "original" Columbus MSA to include all of Franklin and Licking counties. The OCC noted VCNB can reasonably serve the entirety of both counties as evidenced by a notable volume of loans originated in the excluded area. Further, VCNB has since re-assessed and revised the delineation of its AA to include the five whole counties of Fairfield, Franklin, Hocking, Licking, and Pickaway.

Additional information regarding VCNB's operations, demographic data, job market, housing cost, competition, and credit needs is discussed below. This information provides further performance context for VCNB's operations in each AA.

Columbus MSA

VCNB operates 11 branches in the Columbus MSA with three in Fairfield County, two in Franklin County, two in Hocking County, one in Licking County, and three in Pickaway County. Each location offers lobby and drive-thru service as well as an ATM. In addition, VCNB owns two stand-alone, deposit-taking ATMs, one in Fairfield County and one in Pickaway County.

Based on 2020 Census data, five branches are in a moderate-income CT, three branches and both stand-alone ATMs are in a middle-income CT, and three branches are in an upper-income CT.

Demographic Information of the Assessment Area							
Assessment Area: Columbus MSA (2021)							
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #	
Geographies (Census Tracts)	364	17.9	27.2	29.1	24.7	1.1	
Population by Geography	1,618,995	11.9	25.2	32.7	29.3	1.0	
Housing Units by Geography	700,490	13.5	26.1	32.3	27.9	0.2	
Owner-Occupied Units by Geography	366,797	6.1	21.6	36.1	36.2	0.0	
Occupied Rental Units by Geography	264,258	19.4	31.4	29.1	19.6	0.5	
Vacant Units by Geography	69,435	29.9	29.2	24.9	15.4	0.6	
Businesses by Geography	126,601	10.8	20.5	29.5	38.6	0.6	
Farms by Geography	3,293	6.4	19.4	41.2	32.9	0.2	
Family Distribution by Income Level	386,769	23.9	17.6	19.8	38.7	0.0	
Household Distribution by Income Level	631,055	25.6	16.9	17.6	40.0	0.0	
Median Family Income MSA – 18140 Columbus, OH MSA		\$70,454	Median Housing Value			\$152,069	
2021 FFIEC Updated Median Family Income – 18140 Columbus, OH MSA		\$83,900	Median Gross Rent			\$840	
					Families Below Poverty Level		11.7%
					Households Below Poverty Level		14.5%
<i>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.</i>							

Demographic Information of the Assessment Area						
Assessment Area: Columbus MSA (2022-2023)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	433	14.1	25.2	33.3	25.4	2.1
Population by Geography	1,747,836	10.8	23.5	35.9	28.1	1.7
Housing Units by Geography	727,055	11.6	24.6	36.2	26.6	1.1
Owner-Occupied Units by Geography	391,704	5.4	19.7	40.4	34.1	0.3
Occupied Rental Units by Geography	280,411	18.0	30.5	31.5	18.2	1.8
Vacant Units by Geography	54,940	22.8	28.7	29.7	16.1	2.7
Businesses by Geography	300,673	9.2	18.0	35.9	35.5	1.4
Farms by Geography	6,505	6.0	18.7	42.9	31.8	0.6
Family Distribution by Income Level	410,461	23.7	18.1	20.9	37.3	0.0
Household Distribution by Income Level	672,115	24.9	17.2	18.5	39.4	0.0
Median Family Income MSA - 18140 Columbus, OH MSA		\$84,088	Median Housing Value			\$188,116
2023 Weighted Average of FFIEC Updated Median Family Income – 18140 Columbus, OH MSA		\$100,900	Median Gross Rent			\$995
			Families Below Poverty Level			9.8%
			Households Below Poverty Level			12.5%
<i>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.</i>						

Job Market

Business demographic data from the 2020 Census and 2023 Dun and Bradstreet (D&B) shows the primary industries are services (32.8 percent), finance, insurance, and real estate (11.0 percent), and retail trade (8.6 percent). In addition, a notable percentage of establishments are categorized as non-classifiable (29.9 percent). Some of the major and notable employers in the Columbus MSA include local schools, county government, and the following companies listed in the table below.

Major and Notable Employers	
Fairfield County	Cyril-Scott Co, Oneida Group/Anchor Hocking, Fairfield Medical Center, and Mid West Fabricating Co
Franklin County	Abercrombie & Fitch, Battelle Memorial Institute, Cardinal Health Inc, and Huntington Bancshares
Hocking County	Amanda Bent Bolt Co, Hocking Valley Community Hospital, Kilbarger Construction, and Kroger Co
Licking County	Amazon, Anomatic Corp, Boeing Co, and Licking Memorial Health Systems
Pickaway County	Berger Health System, DuPont, PPG Industries, and Sofidel

Source: Ohio Department of Development County Profiles

The average annual unemployment rate for the state of Ohio and each county in the Columbus MSA gradually improved each year during the evaluation period. Comparatively, the unemployment rate for all counties was lower than or slightly above the rate for the state of Ohio. Both the state and county rates are considered acceptable and indicate those wanting full-time work should be able to find a job. The following table summarizes these unemployment rates.

Average Annual Unemployment Rates			
	2021	2022	2023
State of Ohio	5.1	4.0	3.5
Fairfield County	4.4	3.5	3.1
Franklin County	5.0	3.4	3.1
Hocking County	4.9	4.1	3.7
Licking County	4.1	3.4	3.1
Pickaway County	4.5	3.7	3.3

Source: Bureau of Labor Statistics; Rates Not Seasonally Adjusted

Housing Cost

A home mortgage may not be affordable for all low-and moderate-income families in the AA. The demographic data in the table below shows the median housing value for the AA was at least 3.6 times the annual income of a low-income family and at least 2.3 times the annual income of a moderate-income family.

Housing Value vs Annual Income		
	2021	2023
Median Housing Value (MHV)	\$152,069	\$188,116
Median Family Income (MFI)	\$ 83,900	\$ 100,900
Low Income Level (<50% MFI)	\$ 41,950	\$ 50,450
Moderate-Income Level (<80% MFI)	\$ 67,120	\$ 80,720

Source: 2015 and 2020 ACS Census; 2021 and 2023 Updated Federal Financial Institutions Examination Council (FFIEC) MFI

In addition, the median list price for homes according to Realtor.com rose during the evaluation period and was higher than the median housing value indicated by Census data. From January 2021 to December 2023, the median list price of homes for the Columbus MSA increased from

\$299,900 to \$359,900. Therefore, some low- and moderate-income families may not be able to afford and maintain a home or qualify for a mortgage when also considering the down payment requirement, taxes and insurance, and other debt payments.

Competition

Competition for deposits is significant given the number and size of the financial institutions with offices in the Columbus MSA. As of June 30, 2023, Federal Deposit Insurance Corporation (FDIC) deposit data shows VCNB and 45 other FDIC-insured banks have 390 offices with \$95.5 billion in deposits. The top two banks, Huntington National Bank and JPMorgan Chase Bank, National Association (N.A.), hold 66.2 percent of the deposit market share. In comparison, VCNB’s 11 offices have total deposits of \$764.3 million. This level represents a market share of 0.8 percent, which ranks VCNB 11th in the group.

Competition for home mortgage loans is significant. Based on 2021 and 2022 aggregate loan data, the top five lenders in the Columbus MSA capture 23 to 26 percent of the market share. VCNB maintained a market share of approximately 0.4 percent. Among reporting lenders, VCNB ranked 59th in 2021 and 50th in 2022.

Aggregate Lending Data			
	# of Loans	# of Lenders	Top Five Lenders (Market Share %)
Home Mortgage			
2021	97,725	584	Huntington National Bank (7.9), Rocket Mortgage (5.2), Union Savings Bank (4.9), JPMorgan Chase, N.A. (4.3), and Fifth Third Bank, N.A. (4.0)
2022	58,217	590	Huntington National Bank (8.2), Fifth Third Bank, N.A. (4.3), Rocket Mortgage (4.0), US Bank, N.A. (3.3), and Third Federal Savings & Loan (2.8)

Source: 2021 and 2022 Aggregate HMDA and CRA loan data

Community Contact

The OCC considered information from an interagency listening session with representatives from several community organizations in the Columbus area. The participants discussed demographic trends, affordable housing, and workforce development. One participant stated central Ohio is the fastest growing area in the state and Franklin County is the most populous. It was also noted that affordable housing has always been a social issue but is becoming an economic development issue as well. In Columbus, many households spend at least 50 percent of income on housing and thousands of low-income families are on waiting lists for public housing and Section 8 voucher programs. The participants mentioned other affordable housing issues including low-income homeownership sustainability and unique housing needs of refugees. In addition, the participants shared that they are seeing difficulty with families seeking jobs and workforce programs due to gaps in childcare created by the work and job training requirements.

The OCC also reviewed information from interviews with representatives of two community organizations that provide affordable housing. Both representatives mentioned affordable housing as a primary need of their clients and stated more affordable, quality housing options are needed. One representative further stated much of the available rental stock is substandard, the

supply is low, and rent is high. The other representative noted the inventory of homes for sale is low and potential home buyers are being outbid by local investors. Both representatives also commented on the need for financial literacy. One representative believes coaching and help with personal finance management is a major need. The other representative said many of their clients do not have checking accounts or a banking relationship.

During the listening session and interviews, the community contacts shared there are various opportunities for banks to support the efforts of their organizations. These opportunities for CD, financing programs, or other credit related projects include general operating support, low-cost construction financing, affordable mortgages, rehab loans, and lines of credit. Other opportunities mentioned were second chance checking accounts, no/low-cost checking accounts, and tax assistance volunteers.

Ohio Non-MSA

VCNB operates its main office and four branches in a three-county area within the Ohio Non-MSA. The main office is in Vinton County, three branches are in Ross County, and one branch is in Jackson County. Each location offers lobby and drive-thru service as well as an ATM. In addition, VCNB owns one stand-alone, deposit-taking ATM in Vinton County. Based on 2020 Census data, the main office, two branches, and the stand-alone ATM are in a middle-income CT. There is also one branch in a moderate-income CT and one branch in an upper-income CT.

Demographic Information of the Assessment Area						
Assessment Area: Ohio Non-MSA (2021)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	27	0.0	18.5	70.4	11.1	0.0
Population by Geography	123,422	0.0	15.3	74.3	10.3	0.0
Housing Units by Geography	52,697	0.0	15.9	74.1	10.0	0.0
Owner-Occupied Units by Geography	32,914	0.0	13.8	74.7	11.4	0.0
Occupied Rental Units by Geography	13,328	0.0	20.2	71.6	8.2	0.0
Vacant Units by Geography	6,455	0.0	17.9	75.8	6.3	0.0
Businesses by Geography	5,708	0.0	26.8	64.6	8.6	0.0
Farms by Geography	360	0.0	16.7	71.7	11.7	0.0
Family Distribution by Income Level	31,662	24.3	19.2	20.4	36.2	0.0
Household Distribution by Income Level	46,242	26.5	16.7	18.5	38.3	0.0
Median Family Income Non-MSAs - OH		\$55,785	Median Housing Value			\$101,153
2021 FFIEC Updated Median Family Income – Non-MSAs OH		\$64,700	Median Gross Rent			\$659
			Families Below Poverty Level			15.3%
			Households Below Poverty Level			18.6%
<i>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.</i>						

Demographic Information of the Assessment Area						
Assessment Area: Ohio Non-MSA (2022-2023)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	27	0.0	29.6	59.3	11.1	0.0
Population by Geography	122,546	0.0	24.9	63.5	11.6	0.0
Housing Units by Geography	53,246	0.0	27.3	60.6	12.1	0.0
Owner-Occupied Units by Geography	34,099	0.0	24.2	63.1	12.7	0.0
Occupied Rental Units by Geography	13,173	0.0	32.6	56.2	11.2	0.0
Vacant Units by Geography	5,974	0.0	33.2	56.1	10.7	0.0
Businesses by Geography	9,102	0.0	31.2	57.4	11.4	0.0
Farms by Geography	550	0.0	20.2	71.6	8.2	0.0
Family Distribution by Income Level	31,802	23.6	18.7	21.9	35.7	0.0
Household Distribution by Income Level	47,272	26.6	16.4	18.9	38.1	0.0
Median Family Income Non-MSAs – OH		\$66,684	Median Housing Value			\$119,083
2023 FFIEC Updated Median Family Income Non-MSAs – OH		\$79,500	Median Gross Rent			\$706
			Families Below Poverty Level			11.7%
			Households Below Poverty Level			16.0%
<i>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.</i>						

Job Market

Business demographic data from the 2020 Census and 2023 D&B shows the primary industries are services (33.5 percent), retail trade (12.9 percent), and finance, insurance, and real estate (8.4 percent). In addition, a notable percentage of establishments are categorized as non-classifiable (18.9 percent). Some of the major and notable employers in the Ohio Non-MSA include local schools, county government, and the following companies listed in the table below.

Major and Notable Employers	
Jackson County	Bellisio Foods Inc, General Mills Inc, OSCO Industries Inc, and Speyside Bourbon Cooperage
Ross County	Adena Regional Health, Horizon Telcon Inc, Infosight Corp, and Kenworth Truck Co
Vinton County	Austin Powder Co, Campbell’s Market, Crownover Lumber Co Inc, and Twin Maples Nursing Home
<i>Source: Ohio Department of Development County Profiles</i>	

The average annual unemployment rate for the state of Ohio and each county in the Ohio Non-MSA gradually improved each year during the evaluation period. Comparatively, Jackson and Vinton County experience higher unemployment rates than Ross County and the state of Ohio. However, all rates are considered acceptable and indicate those wanting full-time work should be able to find a job. The following table summarizes these unemployment rates.

Average Annual Unemployment Rates			
	2021	2022	2023
State of Ohio	5.1	4.0	3.5
Jackson County	6.2	5.0	4.6
Ross County	4.9	3.8	3.4
Vinton County	6.2	5.0	4.8
<i>Source: Bureau of Labor Statistics; Rates Not Seasonally Adjusted</i>			

Housing Cost

A home mortgage may not be affordable for all low- and moderate-income families in the AA. The demographic data in the table below shows the median housing value for the AA was at least 3.0 times the annual income of a low-income family and at least 1.9 times the annual income of a moderate-income family.

Housing Value vs Annual Income		
	2021	2023
Median Housing Value (MHV)	\$101,153	\$119,083
Median Family Income (MFI)	\$ 64,700	\$ 79,500
Low Income Level (<50% MFI)	\$ 32,350	\$ 39,750
Moderate-Income Level (<80% MFI)	\$ 51,760	\$ 63,600
<i>Source: 2015 and 2020 ACS Census; 2021 and 2023 Updated FFIEC MFI</i>		

In addition, the median list price for homes according to Realtor.com rose during the evaluation period and was higher than the median housing value indicated by Census data. From January 2021 to December 2023, the median list price of homes increased from \$169,900 to \$249,900 in Ross County, from \$140,000 to \$200,000 in Jackson County, and from \$139,000 to \$395,000 in Vinton County. Therefore, some low- and moderate-income families may not be able to afford and maintain a home or qualify for a mortgage when also considering the down payment requirement, taxes and insurance, and other debt payments.

Competition

Competition for deposits is moderate given the number and size of the financial institutions with offices in the Ohio Non-MSA. As of June 30, 2023, FDIC deposit data shows VCNB and 11 other FDIC-insured banks have 33 offices with \$1.9 billion in deposits. VCNB’s five offices have total deposits of \$448 million. This level represents a market share of 23 percent, which ranks VCNB first in the group. The other top banks are Kington National Bank (16.3 percent), Wesbanco Bank, Inc (12.8 percent), and PNC Bank, N.A. (12.2 percent).

Competition for home mortgage loans is notable. Based on 2021 and 2022 aggregate loan data, the top five lenders in the Ohio Non-MSA capture approximately 29 percent of the market share. VCNB ranks first among all reporting lenders with a market share of nearly 9 percent.

Aggregate Lending Data			
	# of Loans	# of Lenders	Top Five Lenders (Market Share%)
Home Mortgage			
2021	4,197	195	VCNB (8.8), Huntington National Bank (6.3), Rocket Mortgage (5.2), Fifth Third Bank, N.A. (4.7), and Hometown Lenders, Inc. (4.0)
2022	2,815	250	VCNB (8.9), Wesbanco Bank, Inc. (5.7), Fifth Third Bank, N.A. (5.0), Rocket Mortgage (4.7), and Atomic Credit Union (4.6)

Source: 2021 and 2022 Aggregate HMDA and CRA loan data

Community Contacts

The OCC reviewed information from interviews with representatives of two community organizations that provide social services. Both contacts mentioned affordable housing as a primary need of their clients and stated more affordable, quality housing options are needed. One of the contacts noted there is also a need for better paying full-time jobs, affordable childcare, financial literacy, and emergency assistance for utilities and medical/dental care. As such, the contacts stated possible credit and CD opportunities for bank participation include funding for general operations and capital campaigns, low-interest financing for housing projects, providing support for financial literacy programs, and volunteering to serve as a member of the board or audit committee.

Scope of Evaluation in Ohio

The OCC performed a full-scope review for VCNB's two AAs, the Columbus MSA and the Ohio Non-MSA. The OCC weighted each AA equally. VCNB's offices and deposits are concentrated in the Columbus MSA, but the number of home mortgage and consumer loans analyzed was more evenly distributed between the two AAs. In addition, VCNB's presence in the Ohio Non-MSA is important given its loan and deposit market share as compared to the competition.

Conclusions in 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 Full-Scope Reviews

Based on full scope reviews, the bank's lending performance in the state of Ohio is reasonable. VCNB's performance in the Columbus MSA and the Ohio Non-MSA is reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibits a reasonable geographic distribution of loans in the state. The OCC placed more weight on VCNB's performance in moderate-income geographies as these areas have a higher percentage of owner-occupied housing units. The OCC also gave more weight to performance in 2022-2023 due to the higher volume of loans for this period.

Home Mortgage Loans

Columbus MSA

Overall, VCNB exhibits a reasonable geographic distribution of home mortgage loans in the Columbus MSA. This conclusion reflects the following results:

- In 2021, VCNB's percentage of home mortgage loans made in low-income CTs was below the percentage of owner-occupied housing units (OOHUs) and the aggregate percentage. VCNB's percentage of home mortgage loans made in moderate-income CTs exceeded the percentage of OOHUs and the aggregate percentage.
- In 2022-23, VCNB's percentage of home mortgage loans made in low-income CTs was below the percentage of OOHUs and the aggregate percentage. VCNB's percentage of home mortgage loans made in moderate-income CTs exceeded the percentage of OOHUs and the aggregate percentage.
- For 2021-2023, VCNB made 23 loans in low-income CTs and 273 loans in moderate-income CTs. Respectively, these numbers represented 2.4 percent and 29.0 percent of the 941 total home mortgage loans made.

Ohio Non- MSA

Overall, VCNB exhibits an excellent geographic distribution of home mortgage loans in the Ohio Non-MSA. This conclusion reflects the following results:

- In 2021, the AA had no low-income CTs and five moderate-income CTs. VCNB's percentage of home mortgage loans made in moderate-income CTs was below the percentage of OOHUs and the aggregate percentage.
- In 2022-23, the AA had no low-income CTs and eight moderate-income CTs. VCNB's percentage of home mortgage loans made in moderate-income CTs exceeded the percentage of OOHUs and the aggregate percentage.
- For 2021-2023, VCNB made 164 loans in moderate-income CTs. This number represented 18.6 percent of the 881 total home mortgage loans made.
- In addition, the AA had nine distressed middle-income CTs and three underserved middle-income CTs in 2021. VCNB made 300 loans in middle-income CTs with 211 made in a distressed or underserved CT. This level represents 70.3 percent of loans made in a distressed or underserved middle-income geography and 58.4 percent of total loans made.

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.

Consumer Loans

Columbus MSA

Overall, VCNB exhibits an excellent geographic distribution of consumer loans in the Columbus MSA. This conclusion reflects the following results:

- In 2021, VCNB's percentage of consumer loans made in both low- and moderate-income CTs exceeded the percentage of households (HHs).
- In 2022-2023, VCNB's percentage of loans in low-income CTs was below the percentage of HHs. VCNB's percentage of loans to moderate-income CTs exceeded the percentage of HHs.
- For 2021-2023, VCNB made six loans in low-income CTs and 28 loans in moderate-income CTs. Respectively, these numbers represented 9 percent and 41.8 percent of the 67 loans that the OCC transaction tested.

Ohio Non-MSA

Overall, VCNB exhibits a reasonable geographic distribution of consumer loans in the Ohio Non-MSA. The OCC placed emphasis on VCNB's performance in low- and moderate-income geographies, but also considered loans made to distressed or underserved middle-income geographies.

- In 2021, the AA had no low-income CTs and five moderate-income CTs. VCNB's percentage of consumer loans originated or purchased in the moderate-income CTs was well below the percentage of HHs.
- In 2022-2023, the AA had no low-income CTs, no underserved or distressed CTs, and eight moderate-income CTs. VCNB's percentage of consumer loans originated or purchased in moderate-income CTs was near to the percentage of HHs.
- For 2021-2023, 11 of 60 loans sampled or 18.3 percent were made in moderate-income CTs.
- In addition, the AA had nine distressed middle-income CTs and three underserved middle-income CTs in 2021. VCNB made 17 loans in middle-income CTs with 10 made in a distressed or underserved CT. This level represents 59 percent of loans made in a middle-income geography and 50 percent of the loan sample.

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

Lending Gap Analysis

The OCC reviewed internal reports and maps of lending activity during the evaluation period and did not identify any unexplained, conspicuous gaps in the lending distribution.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels, given the product lines offered by the bank. The OCC considered several factors that likely limited lending opportunities to low- and moderate-income borrowers, including housing costs in

relation to MFI, percentage of families and households below poverty level, competition, pandemic environment, and rising interest rates.

Home Mortgage Loans

Columbus MSA

Overall, VCNB exhibits a reasonable borrower distribution of home mortgage loans in the Columbus MSA. This conclusion reflects the following results:

- In 2021, VCNB's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families, but near to the aggregate percentage. VCNB's percentage of home mortgage loans to moderate-income borrowers was near to the percentage of moderate-income families, yet below the aggregate percentage.
- In 2022-2023, VCNB's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families, but near to the aggregate percentage. VCNB's percentage of home mortgage loans to moderate-income borrowers was below the percentage of moderate-income families and the aggregate percentage.
- For 2021-2023, VCNB made 82 loans to low-income borrowers and 155 loans to moderate-income borrowers. Respectively, these numbers represented 8.7 percent and 16.5 percent of the 941 total home mortgage loans made.

Ohio Non-MSA

Overall, VCNB exhibits a reasonable borrower distribution of home mortgage loans in the Ohio Non-MSA. This conclusion reflects the following results:

- In 2021, VCNB's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families, but just above the aggregate percentage. VCNB's percentage of home mortgage loans to moderate-income borrowers was below the percentage of moderate-income families and the aggregate percentage.
- In 2022-2023, VCNB's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families and below the aggregate percentage. VCNB's percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and was near to the aggregate percentage.
- For 2021-2023, VCNB made 56 loans to low-income borrowers and 161 loans to moderate-income borrowers. Respectively, these numbers represented 6.4 percent and 18.3 percent of the 881 total home mortgage loans made.

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.

Consumer Loans

Columbus MSA

Overall, VCNB exhibits a reasonable borrower distribution of consumer loans in the Columbus MSA. This conclusion reflects the following results:

- In 2021, VCNB did not make any consumer loans to low-income borrowers. VCNB's percentage of consumer loans made to moderate-income borrowers exceeded the percentage of moderate-income HHs.

- In 2022-2023, VCNB's percentage of consumer loans made to low-income borrowers was below the percentage of low-income HHs. VCNB's percentage of consumer loans made to moderate-income borrowers was below the percentage of moderate-income HHs.
- For 2021-2023, VCNB made eight loans to low-income borrowers and 16 loans to moderate-income borrowers. Respectively, these numbers represented 11.9 percent and 23.9 percent of the 67 loans that the OCC transaction tested.

Ohio Non-MSA

Overall, VCNB exhibits a reasonable borrower distribution of consumer loans in the Ohio Non-MSA. This conclusion reflects the following results:

- In 2021, VCNB's percentage of consumer loans to low-income borrowers was well below the percentage of low-income HHs. VCNB's percentage of consumer loans made to moderate-income borrowers was below the percentage of HHs.
- In 2022-2023, VCNB's percentage of consumer loans made to low-income borrowers was well below the percentage of low-income HHs. VCNB's percentage of consumer loans made to moderate-income borrowers exceeded the percentage of HHs.
- For 2021-2023, VCNB made three loans to low-income borrowers and ten loans to moderate-income borrowers. Respectively, these numbers represented 5 percent and 16.7 percent of the 60 loans that the OCC transaction tested.

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

Responses to Complaints

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

Community Development Test

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

Conclusions for Areas Receiving Full-Scope Reviews

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

Number and Amount of Community Development Loans

VCNB's CD lending demonstrates excellent responsiveness to CD needs. In total, VCNB originated 734 CD loans representing 26.5 percent of the bank's tier one capital as of December 31, 2023. Most of these loans were made through the Small Business Administration's Paycheck Protection Program (PPP), an innovative and flexible loan program

to help businesses keep their workforce employed during the COVID-19 pandemic. VCNB also makes loans through the Ohio Treasurer’s Grow Now program for small businesses and Ag-LINK program for farmers, agribusinesses, and co-ops. Under both programs, eligible borrowers receive an interest rate reduction on new or existing loans.

The CD 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.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Columbus MSA	389	53.0	19,673	52.1
Ohio Non-MSA	251	34.2	10,206	27.0
Statewide/Regional with Indirect Benefit	94	12.8	7,910	20.9
Total	734	100.0	37,789	100.0

Columbus MSA

VCNB originated 389 CD loans totaling \$19.7 million or 21.9 percent of allocated tier one capital. CD lending in the Columbus MSA consisted of 374 PPP loans totaling \$12.8 million with 116 loans made in low- or moderate income CTs. VCNB also originated 15 other CD loans such as the following:

- five loans to small farms totaling \$2.1 million that were made through the Ohio Treasurer’s Ag-LINK program,
- a \$1.8 million loan to a community improvement corporation to finance a major construction and rehabilitation of a building in a moderate-income CT that will include renovation of space for a new restaurant, and
- three loans totaling \$1.4 million to purchase properties for use as recovery housing for individuals during their transition from active addiction to self-reliance.

Ohio Non-MSA

VCNB originated 251 CD loans totaling \$10.2 million or 34.2 percent of allocated tier one capital. CD lending in the Ohio Non-MSA consisted of 242 PPP loans totaling \$6.8 million with 27 loans made in moderate-income CTs and 130 loans made in distressed middle-income CTs. VCNB also originated nine other CD loans that included:

- a \$880,000 loan to a small business that was made through the Ohio Treasurer’s Grow Now program,
- three loans to small farms totaling \$400,500 that were made through the Ohio Treasurer’s Ag-LINK program,
- a \$1.6 million loan to construct a retail store and training center that will provide job training and opportunities for those with disabilities,

- a \$400,000 loan to make improvements to a community center in a moderate-income CT, and
- three loans totaling \$102,670 that supported essential infrastructure and community services for low- and moderate-income residents.

Broader Statewide or Regional Area

VCNB is responsive to the CD needs and opportunities in both AAs; therefore, the OCC considered CD lending in the broader statewide or regional area that provided indirect benefit to the AAs. The bank originated 94 CD loans totaling \$7.9 million or 5.6 percent of total tier one capital. CD lending in the statewide area consisted of 92 PPP loans totaling \$1.3 million with 21 loans made in low- and moderate-income CTs and 49 loans made in distressed or underserved middle-income CTs. VCNB also made a \$5.6 million loan to construct a new medical facility in a distressed middle-income geography, and a \$924,300 loan to improve schools in a district with most students from low- and moderate-income families.

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)
Columbus MSA	1	622	50	833	51	63.8	1,455	26.9		
Ohio Non-MSA	1	97	22	93	23	28.8	190	3.5		
Statewide/Regional with Direct Benefit			1	3	1	1.2	3	0.1		
Statewide/Regional with Indirect Benefit	1	405	4	3,346	5	6.2	3,751	69.5		
Total	3	1,124	77	4,275	80	100.0	5,399	100.0		

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

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

The Qualified Investment Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified CD investments. The table includes all CD investments, including prior period investments that remained outstanding as of December 31, 2023.

VCNB's qualified investment activity demonstrates adequate responsiveness to CD needs. During the evaluation period, the bank had 80 qualified CD investments totaling \$5.4 million. This represents 3.8 percent of tier one capital as of December 31, 2023.

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

Columbus MSA

VCNB had qualified investments of \$1.5 million, which represents 1.6 percent of allocated tier one capital. These investments include a municipal bond with an outstanding balance of \$622,000. This bond funded renovations and improvements of county government buildings occupied by various agencies, departments, boards, and commissions that provide essential community services. The other investments include a \$700,000 revenue bond issued by a housing finance authority and 49 donations totaling \$133,040. The donations were made to organizations that support affordable housing, economic development, revitalization, or community services to low- and moderate-income residents.

Ohio Non-MSA

VCNB had qualified investments of \$189,884, which represents 0.4 percent of allocated tier one capital. These investments include a municipal bond with an outstanding balance of \$96,500 and 22 donations totaling \$93,384. The bond funded the purchase of school buses for a local school district in a distressed middle-income CT. The donations were made to organizations that support affordable housing, economic development, or community services to low- and moderate-income residents.

Broader Statewide or Regional Area

VCNB is responsive to CD needs and opportunities in its AAs; therefore, the OCC also considered CD investments in the broader statewide or regional area with direct and indirect benefit to the bank's AAs. The bank made four qualifying donations in the broader regional or statewide area. One donation of \$3,000 supported a foundation that provides summer workshops and scholarships to low- and moderate-income youth in several counties within the bank's AAs. Three other donations totaling \$13,000 supported economic development and affordable housing efforts that indirectly benefit the AAs. VCNB also had a prior period investment in a mortgage-backed security (MBS) and a new investment in a municipal bond that indirectly benefits the AAs. The \$405,000 MBS supported affordable housing for low- and moderate-income borrowers and the \$3.3 million bond funded improvements to a metro library with multiple locations in low- and moderate CTs.

Extent to Which the Bank Provides Community Development Services

VCNB employees demonstrated adequate responsiveness to CD needs in the AAs. In total, 33 employees volunteered their financial expertise to 54 different organizations that serve the AAs or a broader regional area that includes the AA.

Columbus MSA

Fifteen employees provided CD services to 24 different organizations that serve the Columbus MSA. These employees primarily served in a leadership role as a board or committee member for a variety of organizations that focus on economic development or education and other community services targeted to the low- and moderate-income residents. For example, one employee served as a board member for a local foundation that strives to promote education, growth, community, and success. Another employee served on a council that provides funding, programming, and hands-on services to businesses. Several other employees serve as a board or committee member for organizations focused on economic development and services to existing businesses and local government.

Ohio Non-MSA

Twenty-five employees provided CD services to 27 different organizations that serve the Ohio Non-MSA. Many of these employees served as a board or committee member for organizations that focus on economic development, revitalization, affordable housing, or financial literacy and other community services for low- and moderate-income residents. For example, one employee served as president of an organization that strives to create a unified effort that helps both the residential and business community grow together. Another employee served on the board of an organization that provides affordable housing for low- and moderate-income individuals and families. In addition, two employees served as volunteers of a program that provides free tax preparation service to low- and moderate-income taxpayers.

Broader Regional/Statewide Area

Five employees provided CD services to six different organizations that serve a broader regional area that includes a portion of both AAs. These employees primarily served in a leadership role as a board or committee member for organizations that focus on economic development, workforce development, or financial literacy. For example, one employee is a board member with a local government workforce development organization that benefits both AAs through providing workforce development services in Fairfield, Ross, Pickaway, Vinton, and Hocking counties. Two other employees provide financial advisory services as a committee member for a foundation that manages charitable funds in the Appalachia counties (Hocking, Jackson, Ross, and Vinton). One employee also provides financial literacy workshops for two organizations that serve Appalachia counties.

Branches, Other Services, and Delivery Systems

VCNB's branches, other services, and delivery systems are accessible to geographies and individuals of different income levels in its AAs. Based on 2020 Census data, VCNB's main office, five branches, and three stand-alone ATMs are in a middle-income CT. Six branches are in a moderate-income CT and four offices are in an upper-income CT. Services offered and hours of operation are comparable among these locations. To further support customer accessibility, VCNB offers online and mobile banking services.

VCNB also offers two retail products that benefit low- and moderate-income people. The bank offers interest on lawyer's trust accounts (IOLTAs), which are used to assist in providing legal help to low- and moderate-income individuals and families. In 2023, the bank had IOLTAs with average monthly balances totaling \$3.1 million. The bank also participates in the Federal Home Loan Bank's Welcome Home Program. This program provides grants to assist low- and moderate-income borrowers with the down payment or closing costs. During the evaluation period, VCNB helped three low- and moderate-income borrowers obtain a grant; two borrowers received \$10,000 and one received \$15,000.

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 metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed:	01/01/2021 to 12/31/2023	
Bank Products Reviewed:	Home mortgage and consumer loans CD loans, qualified investments, CD services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	Not Applicable	Not Applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Ohio		
Columbus MSA	Full Scope	Fairfield, Franklin, Hocking, Licking, and Pickaway Counties
Ohio Non-MSA	Full Scope	Jackson, Ross, and Vinton Counties

Appendix B: Summary of MMSA and State Ratings

RATINGS			
Vinton County National Bank			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Vinton County National Bank	Satisfactory	Outstanding	Satisfactory
State:			
Ohio	Satisfactory	Outstanding	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 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): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

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

- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

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	
Columbus MSA	427	97,417	54.2	97,725	6.1	2.8	6.1	21.6	29.0	19.0	36.1	50.1	34.6	36.2	18.0	40.3	0.0	0.0	0.0	
Ohio Non-MSA	361	52,763	45.8	4,127	0.0	0.0	0.0	13.8	9.4	11.8	74.7	83.1	73.4	11.4	7.5	14.9	0.0	0.0	0.0	
Total	788	150,180	100.0	101,852	5.6	1.5	5.8	21.0	20.1	18.7	39.3	65.2	36.1	34.2	13.2	39.3	0.0	0.0	0.0	

*Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data.
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	
Columbus MSA	514	112,299	49.7	58,217	5.4	2.1	6.9	19.7	29.0	19.3	40.4	51.4	39.7	34.1	16.1	33.5	0.3	1.4	0.6	
Ohio Non-MSA	520	74,325	50.3	2,815	0.0	0.0	0.0	24.3	25.0	21.3	63.1	66.2	64.1	12.7	8.8	14.6	0.0	0.0	0.0	
Total	1,034	186,624	100.0	61,032	5.0	1.1	6.6	20.1	27.0	19.4	42.2	58.8	40.8	32.4	12.5	32.6	0.3	0.7	0.5	

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			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
Columbus MSA	427	97,417	54.2	97,725	23.9	8.0	8.2	17.6	17.3	20.0	19.8	25.1	20.9	38.7	40.0	34.0	0.0	9.6	16.9
Ohio Non-MSA	361	52,763	45.8	4,127	24.3	5.8	5.7	19.2	16.1	17.1	20.4	25.8	22.3	36.2	44.3	32.5	0.0	8.0	22.3
Total	788	150,180	100.0	101,852	24.0	7.0	8.1	17.7	16.8	19.9	19.8	25.4	21.0	38.5	42.0	33.9	0.0	8.9	17.1

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			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
Columbus MSA	514	112,299	49.7	58,217	23.7	9.3	9.8	18.1	15.8	21.4	20.9	22.8	21.5	37.3	39.3	31.2	0.0	12.8	16.1
Ohio Non-MSA	520	74,325	50.3	2,815	23.6	6.7	8.1	18.7	19.8	19.9	21.9	24.0	24.0	35.7	38.7	29.3	0.0	10.8	18.7
Total	1,034	186,624	100.0	61,032	23.7	8.0	9.8	18.2	17.8	21.3	20.9	23.4	21.6	37.2	39.0	31.1	0.0	11.8	16.2

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

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography														2021
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Columbus MSA	21	455	51.2	11.7	19.0	25.7	42.9	33.2	33.3	29.3	4.8	0.2	0.0	
Ohio Non-MSA	20	395	48.8	0.0	0.0	15.7	5.0	73.8	85.0	10.5	10.0	0.0	0.0	
Total	41	850	100.0	10.9	9.8	25.0	24.4	35.9	58.5	28.0	7.3	0.2	0.0	

*Source: 2015 U.S. Census; 01/01/2021 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%.*

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography														2022-23
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Columbus MSA	46	858	53.5	10.7	4.3	24.2	41.3	36.7	34.8	27.5	19.6	0.9	0.0	
Ohio Non-MSA	40	819	46.5	0.0	0.0	26.6	25.0	61.1	62.5	12.3	12.5	0.0	0.0	
Total	86	1,677	100.0	10.0	2.3	24.4	33.7	38.3	47.7	26.5	16.3	0.9	0.0	

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

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower														2021
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Columbus MSA	21	455	51.2	25.6	0.0	16.9	47.6	17.6	28.6	40.0	23.8	0.0	0.0	
Ohio Non-MSA	20	395	48.8	26.5	5.0	16.7	15.0	18.5	40.0	38.3	40.0	0.0	0.0	
Total	41	850	100.0	25.7	2.4	16.8	31.7	17.6	34.1	39.8	31.7	0.0	0.0	
<i>Source: 2015 U.S. Census; 01/01/2021 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%.</i>														

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower														2022-23
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Columbus MSA	46	858	53.5	24.9	17.4	17.2	13.0	18.5	28.3	39.4	41.3	0.0	0.0	
Ohio Non-MSA	40	819	46.5	26.6	5.0	16.4	17.5	18.9	30.0	38.1	47.5	0.0	0.0	
Total	86	1,677	100.0	25.0	11.6	17.1	15.1	18.5	29.1	39.3	44.2	0.0	0.0	
<i>Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data. Due to rounding, totals may not equal 100.0%.</i>														