



PUBLIC DISCLOSURE

January 16, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First Citizens National Bank of Upper Sandusky
Charter Number: 18783

100 North Sandusky Avenue
Upper Sandusky, OH 43351

Office of the Comptroller of the Currency

Metro Place V
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 5

STATE RATING 6

 STATE OF OHIO 6

LENDING TEST 10

APPENDIX A: SCOPE OF EXAMINATION A-1

APPENDIX B: SUMMARY OF 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 major factors that support this rating include:

The Lending Test rating is based on the state of Ohio rating and the following overall conclusions:

- A majority of the bank’s loans are inside its assessment areas (AAs).
- The bank’s loan-to-deposit (LTD) ratio is reasonable.
- The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes.
- The bank exhibits a reasonable geographic distribution of loans.

Loan-to-Deposit Ratio

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

The First Citizens National Bank of Upper Sandusky’s (FCNB or bank) LTD ratio over the 12 quarters since the previous Community Reinvestment Act (CRA) evaluation (December 2020 to September 2023) is 64.1 percent. (The LTD ratio for December 2023 was not available during the review.) The ratio ranged from a low of 55.4 percent as of March 2022 to a high of 71.3 percent as of September 2023. The bank’s average LTD ratio of 64.1 percent is reasonable when compared to other financial institutions of similar size and location (total assets under \$375 million with offices in Wyandot, Hardin, Crawford, and Marion Counties). The bank’s LTD ratio ranks fifth highest among a total of ten financial institutions in the AAs. The other nine financial institutions had an average LTD ratio of 67.6 percent, ranging from 46.5 percent to 98.3 percent.

Lending in Assessment Area

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

The bank originated and purchased 77.8 percent of its total loans inside the bank’s AAs during the evaluation period. This analysis is performed at the bank, rather than the AA level.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	39	65.0	21	35.0	60	4,858	28.6	12,153	71.4	17,011
Small Business	46	76.7	14	23.3	60	8,289	60.8	5,349	39.2	13,638
Small Farm	55	91.7	5	8.3	60	8,939	92.2	758	7.8	9,697
Total	140	77.8	40	22.2	180	22,086	54.7	18,261	45.3	40,346

*Source: 2020, 2021, and 2022 Bank Data (transaction testing loan sample).
Due to rounding, totals may not equal 100%.*

Description of Institution

FCNB is a national bank headquartered in Upper Sandusky, Ohio. Upper Sandusky is located approximately 70 miles north of Columbus, Ohio, in Wyandot County. The bank does not have a holding company. As of December 31, 2022, total assets were \$359 million with \$211 million in net loans, \$303 million in total deposits, and \$44 million in tier 1 capital. Net loans represented 59 percent of total assets. There was no merger or acquisition activity that affected the scope of the bank's operations during the evaluation period.

FCNB has nine banking locations in Ohio. The main office and independent drive-thru facility are in Upper Sandusky, Ohio, in Wyandot County. The other branch locations include: one in Carey (Wyandot County), one in Nevada (Wyandot County), one in Upper Sandusky (Wyandot County), one in Dunkirk (Hardin County), one in Powell (Delaware County), two in Marion (Marion County), and one in Delaware (Delaware County). All offices have drive-thru facilities and automated teller machines (ATMs) except the Dunkirk Branch. All branches are in middle- and upper-income census tracts (CTs). In addition to the branches, FCNB has four offsite ATMs in Wyandot County in middle-income CTs. In the spring of 2021, the bank opened one new branch in Delaware, Ohio, in Delaware County. FCNB did not close any branches during the evaluation period.

FCNB is a single-state financial institution with one rating area (Ohio) and two AAs. The AAs meet the requirements of the regulation and do not reflect illegal discrimination or arbitrarily exclude any low- or moderate-income (LMI) areas. The AAs are further described in the "Description of Institution's Operations in Ohio" section of this performance evaluation. The bank's AA is comprised of Wyandot and Marion Counties, as well as two CTs in Hardin County, one CT in Hancock County, and one CT in Crawford County, in a non-metropolitan statistical area (Non-MSA AA). The LMI CTs are in Marion County in the Non-MSA AA. The second AA includes two CTs in Delaware County for 2020 and three CTs in Delaware County for 2021 and 2022 due to the opening of a new branch in Delaware, Ohio, in 2021. All three CTs are middle- or upper-income geographies.

FCNB serves its community with traditional deposit and lending products and services, including online banking. As of the December 31, 2022, Consolidated Reports of Condition and Income (Call Report), the loan portfolio consisted of 27 percent in residential real estate loans (home mortgage), 49 percent in commercial and industrial and commercial real estate loans (business), 23 percent in farm loans, and 1 percent in consumer loans. FCNB's primary business focus is home mortgage, small business, and small farm lending. During the evaluation period, the bank sold approximately \$12.2 million home mortgage loans to the secondary market.

The COVID-19 pandemic in 2020 impacted the local economy, including unemployment data. The Small Business Administration's (SBA) Paycheck Protection Program (PPP) provided loans to help businesses keep their workforces employed during the pandemic. The bank did not originate any PPP loans during the evaluation period; however, management worked with another financial institution to refer bank customers interested in PPP loans.

FCNB's lending activities are consistent with its size, expertise, financial capability, and local economic conditions. There are no legal, financial, or other factors that affect its ability to help meet the credit needs of its AAs. FCNB received a Satisfactory rating for its CRA performance during the prior evaluation period. This rating was reported in the CRA Performance Evaluation dated January 11, 2021.

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 needs of its entire community, including LMI areas. The OCC used small bank CRA evaluation procedures to assess the bank's performance under the Lending Test. The OCC analyzed lending activity in full-year increments during the evaluation period, January 1, 2020, to December 31, 2022. A separate analysis was conducted for each AA.

The OCC evaluated the bank's lending performance based on its primary lending products, home mortgage, small business, and small farm lending. Home mortgage loans represented 36 percent of the number of loans originated and purchased during the evaluation period and 24 percent of dollar volume, business loans represented 26 percent based on number and 45 percent based on dollar volume, farm loans represented 21 percent based on number and 30 percent based on dollar volume, and consumer loans represented 17 percent based on number and 1 percent based on dollar volume. The OCC transaction tested home mortgage, small business, and small farm loans for each year of the evaluation period. Examiners tested 20 loans per year per AA per primary product, if available. A minimum of at least 20 loans were needed in a loan product and in each analysis period for a meaningful analysis.

For analysis purpose, the OCC compared the bank's lending performance with demographic data from the 2015 American Community Survey (ACS) U.S. Census for 2020 and 2021 home mortgages, the 2020 U.S. Census for 2022 home mortgages, and 2021 and 2022 Dun and Bradstreet (D&B) data for business and farm loans. There are two sets of tables in Appendix D for the different census periods. No affiliate activity was included in this analysis. Refer to the table in appendix A, Scope of the Examination, for more information on the scope of the review.

Selection of Areas for Full-Scope Review

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

FCNB 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 the Non-MSA AA and a limited-scope review of the Columbus MSA AA. The limited scope review is due to the bank's limited exposure in two CTs in 2020 and three CTs in 2021 and 2022 in the Columbus MSA AA. FCNB has two branches in the Columbus MSA AA, with the second branch opening in 2021. Approximately 22 percent of the bank's total deposits are inside the Columbus MSA AA as of the Federal Deposit Insurance Corporation's (FDIC) Deposit Market Share Report as of June 30, 2022.

Ratings

The bank's overall rating is based on the state of Ohio rating. FCNB operates all branches in a single state. Since all branches are in Ohio, its overall rating is based on performance solely in Ohio. The state of Ohio rating is based on performance in both AAs.

During the evaluation period and based on the number of loan originations and purchases, approximately 36 percent were home mortgage, 26 percent were business loans, and 21 percent were farm loans. The OCC placed equal weight on home mortgage, business, and farm loans. Of the home mortgage loans originated or purchased inside the AAs during the evaluation period based on transaction testing, 90 percent were in the Non-MSA AA. Of the small business and small farm loans originated or purchased inside the AAs during the evaluation period based on transaction testing, 97 percent and 100 percent, respectively, were in the Non-MSA AA. According to the FDIC's Deposit Market Share Report as of June 30, 2022, 78 percent of the bank's total deposits were in the Non-MSA AA, with 22 percent in the Columbus MSA AA. The OCC placed more weight on the Non-MSA AA.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the 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 major factors that support this rating include:

- FCNB exhibits a reasonable geographic distribution of loans in its AAs.
- FCNB exhibits a reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes.
- FCNB has not received any complaints about its performance in helping to meet the AAs' credit needs during the evaluation period.

Description of Institution's Operations in Ohio

The bank has two AAs: the Non-MSA AA and the Columbus MSA AA. The Non-MSA AA includes all of Wyandot and Marion Counties, as well as two CTs (1.00 and 3.00) in Hardin, one CT (12.00) in Hancock, and one CT (9742.00) in Crawford County. For 2020, the Columbus MSA AA includes two tracts (114.23 and 119.00). For 2021 and 2022, the number of CTs increase to three when adding CT 101.00 given the new branch location in Delaware County. The AAs meet the requirements of the regulation and do not reflect illegal discrimination or arbitrarily exclude any LMI areas. Management selected the AAs based on their targeted lending territory, the area with the most deposit and lending activity, and office locations. The OCC completed a full-scope review of the Non-MSA AA and a limited scope review of the Columbus MSA AA.

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 FCNB's operations in the Non-MSA AA. The tables below provide a summary of demographic data for the AA.

Demographic Information of the Assessment Area						
Assessment Area: Non MSA AA 2020 - 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	28	10.7	17.9	39.3	28.6	3.6
Population by Geography	105,566	8.4	12.4	40.2	33.7	5.4
Housing Units by Geography	44,849	9.7	13.5	42.9	33.9	0.0
Owner-Occupied Units by Geography	28,906	5.7	11.0	44.0	39.3	0.0
Occupied Rental Units by Geography	11,464	15.8	16.8	42.6	24.8	0.0
Vacant Units by Geography	4,479	20.2	21.0	36.5	22.4	0.0
Businesses by Geography	4,658	11.6	7.2	40.2	40.8	0.2
Farms by Geography	506	1.4	1.6	45.1	51.8	0.2
Family Distribution by Income Level	28,086	19.4	18.7	21.5	40.4	0.0
Household Distribution by Income Level	40,370	22.0	17.1	18.7	42.2	0.0
Median Family Income Non-MSAs - OH		\$55,785	Median Housing Value			\$103,699
			Median Gross Rent			\$676
			Families Below Poverty Level			11.2%

Source: 2015 ACS, 2021 D&B Data, and FFIEC Estimated Median Family Income.
 (*) The NA category consists of geographies that have not been assigned an income classification.

Demographic Information of the Assessment Area						
Assessment Area: Non-MSA AA 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	28	3.6	25.0	57.1	10.7	3.6
Population by Geography	103,823	2.0	19.0	59.5	14.7	4.8
Housing Units by Geography	45,145	2.2	21.1	62.1	14.6	0.0
Owner-Occupied Units by Geography	28,730	1.6	14.7	67.4	16.3	0.0
Occupied Rental Units by Geography	11,579	3.0	33.3	52.0	11.8	0.0
Vacant Units by Geography	4,836	4.1	30.4	54.6	10.8	0.0
Businesses by Geography	7,136	0.9	18.3	61.5	19.1	0.1
Farms by Geography	647	0.5	4.0	80.4	15.0	0.2
Family Distribution by Income Level	26,306	18.6	19.5	22.9	39.0	0.0
Household Distribution by Income Level	40,309	22.6	17.8	18.2	41.4	0.0
Median Family Income Non-MSAs - OH		\$66,684	Median Housing Value			\$118,696
			Median Gross Rent			\$721
			Families Below Poverty Level			7.7%

Source: 2020 ACS, 2022 D&B Data, and FFIEC Estimated Median Family Income.
 (*) The NA category consists of geographies that have not been assigned an income classification.

Demographic Data

As of the 2015 ACS U.S. Census data in the table above, the population of the Non-MSA AA is 105,566, with 8.4 percent of the population living in low-income CTs and 12.4 percent in moderate-income CTs. As of the 2015 U.S. Census, the AA consists of 28 CTs, with the composition including three low-income CTs, five moderate-income CTs, 11 middle-income CTs, eight upper-income CTs, and one CT that has not been assigned an income classification. The AA includes 28,086 families and 40,370 households.

There were CT classification changes in the AA during the evaluation period between the 2015 ACS U.S. Census and the 2020 U.S. Census. As of the 2020 U.S. Census data in the table above, the population of the Non-MSA AA is 103,823, with 2 percent in low-income CTs and 19 percent in moderate-income CTs. As of the 2020 U.S. Census, the AA consists of 28 CTs, with the composition including one low income CT, seven moderate income CTs, 16 middle-income CTs, three upper-income CTs, and one CT that has not been assigned an income classification. The AA includes 26,306 families and 40,309 households.

Affordable Housing Cost

According to the 2015 ACS U.S. Census data, the median housing value is \$103,699. With the median family income of \$55,785, moderate-income families make less than \$44,628 annually and low-income families make less than \$27,893 annually. Median housing values are 3.7 times the annual income of low-income families and 2.3 time the annual income of moderate-income families. The cost of housing may create a significant financial barrier to homeownership among some low-income families. The 2015 ACS U.S. Census data show that there are 44,849 total housing units in the Non-MSA AA, which include 64.4 percent owner-occupied, 25.6 percent rental-occupied, and 10 percent vacant units. Approximately, 11.2 percent of families live below the poverty line.

According to the 2020 U.S. Census data, the median housing value is \$118,696. With the median family income of \$66,684, moderate-income families make less than \$53,347 annually and low-income families make less than \$33,342 annually. Median housing values are 3.6 times the annual income of low-income families and 2.2 time the annual income of moderate-income families. The cost of housing may create a significant financial barrier to homeownership among some low-income families. The 2020 U.S. Census data show that there are 45,145 total housing units in the Non-MSA AA, which include 63.7 percent owner-occupied, 25.6 percent rental-occupied, and 10.7 percent vacant units. As of the 2020 U.S. Census, 7.7 percent of families live below the poverty line.

Job Market and Economic Conditions

The economic conditions in the Non-MSA AA have improved over the evaluation period. The average unemployment rate during the evaluation period for Crawford (6.7 percent), Hancock (4.8 percent), Hardin (5.9 percent), Marion (5.6 percent), and Wyandot (4.5 percent) Counties was highest in 2020 and continued to decrease through 2022. The unemployment rate within each county was consistent with both statewide (5.8 percent) and national (5.7 percent) unemployment rates. Large employers in the Non-MSA AA include Whirlpool, Teijin Automotive Technologies, Prospira, Kalmbach Feeds, and Vaughn Industries.

Competition

Competition for deposits in the AA is strong, given the number and size of financial institutions in the AA. Competition is comprised of local community banks and branches of larger financial institutions. According to the June 30, 2022, Deposit Market Share Report from the FDIC, there are 26 financial institutions competing within the Non-MSA AA with 61 offices in the AA. The top five financial

institutions have a combined market share of 56 percent, with FCNB in the top five. FCNB maintains the fifth largest deposit market share with six percent and \$252 million in deposits. This accounts for 78 percent of the bank's total deposits as of June 30, 2022. The top four competitors include Fifth Third Bank, National Association (N.A.), Premier Bank, Huntington National Bank, and JPMorgan Chase Bank, N.A., which have a combined market share of 50 percent.

The primary products for FCNB include home mortgage, small business, and small farm lending. Based on the 2021 Peer Mortgage Data, there are 209 mortgage lending competitors with the top five lenders in the market maintaining a combined market share of 41.6 percent. Based on the 2022 Peer Mortgage Data, there are 185 mortgage lending competitors with the top five lenders in the market having a combined market share of 38 percent. The top lenders include Union Home Bank, Premier Bank, Huntington National Bank, and Rocket Mortgage.

For small business originations, competition for business loans remains strong in the AA. Based on the 2021 Peer Small Business Data Report, there were 78 lenders originating or purchasing small business loans in the Non-MSA AA. The top five financial institutions had a combined market share of 54 percent. The top lenders included JPMorgan Chase Bank, N.A., Premier Bank, U.S. Bank, N.A., American Express National Bank, and Synchrony Bank.

Community Contacts/Credit Needs

As part of the CRA performance evaluation, the OCC reviewed information from three interviews with representatives from affordable housing organizations that serve Crawford, Marion, Hancock, Hardin, and Wyandot Counties, as well as other counties not included in the bank's AA.

The first affordable housing community contact operates in Crawford, Marion, Morrow, and Richland Counties. The most significant concerns that the contact identified are low education attainment, drug abuse, teen pregnancy, child obesity, and limited affordable housing. The second contact operates in Hancock, Hardin, Wyandot, and Putnam Counties. This contact stated there is a significant need for affordable loans to LMI families. The third contact operates in Allen, Auglaize, Hardin, and Van Wert Counties. This community contact stated that needs include first time homeownership mortgages, homeownership grants, financial literacy counseling, small dollar mortgages, and affordable retail products.

In summary, the banking needs in the AA include affordable housing, no cost checking accounts, and financial education. In general, local financial institutions are adequately meeting the credit and community development needs of the community.

Scope of Evaluation in Ohio

The OCC performed a full-scope review of the Non-MSA AA, with a limited-scope review of the Columbus MSA AA. The data in the AAs were analyzed and presented as two AAs for the purpose of this evaluation. Home mortgage, small business, and small farm lending are the bank's primary lending products and were evaluated under the Lending Test. The OCC transaction tested for each primary loan product for the lending analysis. Refer to the "Scope of the Evaluation" section for more details.

As discussed above under the "Scope of the Evaluation" (Ratings section), the Non-MSA AA was weighted heavier than the Columbus MSA AA, and the OCC placed equal weight on each primary product. Refer to the above "Scope of Evaluation" section for more details.

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Distribution of Loans by Income Level of the Geography

The bank exhibits an overall reasonable geographic distribution of loans in the State.

Home Mortgage Loans

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

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

The bank's overall geographic distribution of home mortgage lending reflects poor distribution.

For 2020 through 2022, loan analysis reflects no home mortgage loan originations in LMI tracts. Both demographic and aggregate lending data support that lending opportunities for both demographics are present.

In the lending analysis, the OCC considered other factors contributing to limited lending opportunities within the LMI CTs, including market competition in the AA. For the 2020 – 2021 analysis, there are 209 HMDA reporting competitors with the top five lenders in the market maintaining a combined market share of 41.6 percent. For the 2022 analysis, the top five lenders in the market have a combined market share of 38 percent.

Small Loans to Businesses

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

The OCC compared the percentage of small loans to businesses originated or purchased by the bank in the four geographic income categories and to the distribution of businesses throughout those geographies (demographic data), placing emphasis on the LMI geographies. The OCC also compared the bank's performance against the percentage of small loans to businesses of other lenders (aggregate data), as demonstrated by CRA aggregate data.

In determining conclusions, the OCC gave consideration for opportunities to lend based on the number of CTs in each income level, the level of competition, and the number of businesses located in LMI tracts within the AA.

The bank's overall geographic distribution of small loans to small businesses is reasonable.

For the 2020 analysis, the percentage of small loans to businesses originated or purchased in low-income tracts was below demographic data but slightly above aggregate data. However, for moderate-income tracts, bank data significantly exceeded both demographic and aggregate data.

For the 2021 analysis, the percentage of small loans to businesses originated or purchased in low-income tracts was below both demographic and aggregate data, but overall reasonable with the bank's performance near aggregate data. Lending in moderate-income tracts was consistent with the bank's performance in the low-income tracts.

For the 2022 analysis, the percentage of small loans to business originated or purchased in moderate-income tracts was below both demographic and aggregate data. There were no originated loans in low-income tracts, though demographic and aggregate data reflect limited opportunities.

Competition for business loans remains strong in the AA. As of the 2021 Peer Small Business Data Report, there were 78 lenders originating or purchasing small business loans in the Non-MSA AA. The top five financial institutions accounted for a combined market share of 54 percent.

Small Loans to Farms

Refer to Table S in the state of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

The OCC compared the percentage of small loans to farms originated or purchased by the bank in the four geographic income categories to the distributions of farms throughout those geographies (demographic data), placing emphasis on the LMI geographies. The OCC also compared the bank's performance against the percentage of small loans to farms of other lenders (aggregate data), as demonstrated by CRA aggregate data.

In determining conclusions, the OCC gave consideration for opportunities to lend based on the number of CTs in each income level, the level of competition, and the number of farms located in LMI tracts within the AA.

The bank's overall geographic distribution of small loans to farms is reasonable, given the limited opportunities for farm loans in the AA.

For the 2020 through 2022 analysis, there were no small loans to farms originated or purchased in LMI tracts. On average over the review period, this closely mirrored aggregate data, while demographic data reflected limited lending opportunities. The LMI tracts are in Marion, with limited lending opportunities for small loans to farms given that farming is not as prevalent near city/town limits.

Lending Gap Analysis

The OCC did not identify any unexplained, conspicuous gaps in the lending distribution during the review of bank reports and/or maps.

Distribution of Loans by Income Level of the Borrower

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

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

FCNB exhibits an overall reasonable distribution of home mortgage loans among borrowers of different income levels.

In the 2020 analysis, FCNB's percentage of home mortgage loans to low-income borrowers was below demographic data but significantly exceeded aggregate data. For moderate-income borrowers, FCNB lending was significantly below both demographic and aggregate data.

In the 2021 analysis, FCNB's percentage of home mortgage loans to low-income borrowers was below demographic data but exceeded aggregate data. For moderate-income borrowers, FCNB lending exceeded both demographic and aggregate data.

In the 2022 analysis, FCNB's percentage of home mortgage loans to low-income borrowers was below demographic data but exceeded aggregate data. For moderate-income borrowers, FCNB lending was below both demographic and aggregate data.

The OCC considered other factors in the bank's performance during the evaluation period, including the cost of homeownership in the AA as an obstacle to homeownership for low-income borrowers. For the 2020 – 2021 analysis, the overall median housing values are 3.7 times the weighted average of the median family income of low-income families. Approximately 11.2 percent of families live below the poverty level. Additionally, the percentage of families below poverty in low-income tracts was 35.9 percent and 19.7 percent in moderate-income tracts. For the 2022 analysis, the overall median housing values are approximately 3.6 times the weighted average of the median family income of low-income families. Approximately 7.7 percent of families live below the poverty line. However, the percentage of families below poverty in low-income tracts was 33.7 percent and 18.8 percent in moderate-income tracts. This makes it especially difficult for this segment of the population to afford and maintain a home or qualify for a loan.

Small Loans to Businesses

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

The OCC compared the percentage distribution of the number of small loans to businesses originated or purchased by the bank by gross annual revenue level to businesses with gross annual revenues of \$1 million or less (demographic data). The OCC also compared the bank's performance to aggregate small business data (aggregate data), as demonstrated by CRA aggregate data.

In evaluating the borrower distribution of small loans to businesses of different sizes, the OCC considered the level of competition and its effect on limiting the bank's ability to lend, as well as the economic conditions in the AAs.

FCNB exhibits an overall reasonable distribution of small loans to businesses of different sizes.

In the 2020 analysis, FCNB's percentage of small loans to businesses with gross annual revenues of \$1 million or less was below demographic data but significantly exceeded aggregate data.

In the 2021 analysis, FCNB's percentage of small loans to businesses with gross annual revenues of \$1 million or less was slightly below demographic data but significantly exceeded aggregate data.

In the 2022 analysis, FCNB's percentage of small loans to businesses with gross annual revenues of \$1 million or less was below demographic data but exceeded aggregate data.

Small Loans to Farms

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

The OCC compared the percentage distribution of the number of small loans to farms originated or purchased by the bank by gross annual revenue level to farms with gross annual revenues of \$1 million or less (demographic data). The OCC also compared the bank's performance to aggregate small farm data (aggregate data), as demonstrated by CRA aggregate data.

In evaluating the borrower distribution of small loans to farms of different sizes, the OCC considered the level of competition and its effect on limiting the bank's ability to lend, as well as the economic conditions in the AA.

FCNB exhibits an overall reasonable distribution of small loans to farms of different sizes.

In the 2020 analysis, the bank's percentage of small loans to farms with gross annual revenues of \$1 million or less was below demographic data but significantly exceeded aggregate data.

In the 2021 analysis, the bank's percentage of small loans to farms with gross annual revenues of \$1 million or less was below demographic data but significantly exceeded aggregate data.

In the 2022 analysis, the bank's percentage of small loans to farms with gross annual revenues of \$1 million or less was below demographic data but significantly exceeded aggregate data.

Responses to Complaints

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

Conclusions for Area Receiving a Limited Scope Review

The OCC did not complete an analysis of the Columbus MSA AA as part of this review. The bank's Columbus MSA AA is comprised entirely of middle- or upper-income geographies; therefore, a geographic distribution analysis would not be meaningful. Furthermore, FCNB originated only four home mortgage loans in 2021 and three home mortgage loans in 2022 in the Columbus MSA AA. Additionally, the bank originated one small business loan in 2020 and one in 2022 in the Columbus MSA AA. There were no small farm loans originated in the Columbus MSA AA during the evaluation period. Given minimal loan originations or purchases in the Columbus MSA AA, the OCC also could not complete a meaningful borrower-income distribution analysis.

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 MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	01/01/20 to 12/31/22	
Bank Products Reviewed:	Home mortgage, small business, and small farm loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
States - Ohio		
Non-MSA AA	Full-Scope	Wyandot and Marion Counties, as well as four tracts from Hardin, Hancock, and Crawford Counties.
Columbus MSA AA	Limited-Scope	Delaware County – CT 114.23 and 119; and CT 101 in 2021 and 2022 only. Delaware County is in the Columbus, OH MSA 18140.

Appendix B: Summary of State Ratings

Ratings: The First Citizens National Bank of Upper Sandusky	
Overall Bank:	Lending Test Rating
The First Citizens National Bank of Upper Sandusky	Satisfactory
State:	
Ohio	Satisfactory

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

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

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

Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -
Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

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 AA	0	0	0.0	1,372	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	100.0	0.0	100.0	0.0	0.0	0.0
Non-MSA AA	20	2,490,586	100.0	3,333	5.7	0.0	2.0	11.0	0.0	10.7	44.0	75.0	42.0	39.3	25.0	45.2	0.0	0.0	0.0
Total	20	2,490,586	100.0	4,705	5.0	0.0	1.4	9.7	0.0	7.6	38.9	75.0	29.8	46.3	25.0	61.2	0.0	0.0	0.0

Source: 2015 ACS; 2020 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0%.

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 AA	4	802,000	16.7	1,512	0.0	0.0	0.0	0.0	0.0	0.0	20.7	0.0	16.2	79.3	100.0	83.8	0.0	0.0	0.0
Non-MSA AA	20	2,487,332	83.3	3,586	5.7	0.0	3.4	11.0	0.0	11.6	44.0	65.0	42.8	39.3	35.0	42.2	0.0	0.0	0.0
Total	24	3,289,332	100.0	5,098	4.9	0.0	2.4	9.4	0.0	8.2	40.7	54.2	34.9	45.0	45.8	54.5	0.0	0.0	0.0

Source: 2015 ACS; 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

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 AA	3	571,400	13.0	751	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0
Non-MSA AA	20	2,365,832	87.0	2,498	1.6	0.0	1.4	14.7	0.0	19.0	67.4	95.0	61.1	16.3	5.0	18.5	0.0	0.0	0.0
Total	23	2,937,232	100.0	3,249	1.4	0.0	1.0	12.5	0.0	14.6	57.4	82.6	47.0	28.8	17.4	37.3	0.0	0.0	0.0

Source: 2020 ACS; 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 2020

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 AA	0	0	0.0	1,372	3.1	0.0	1.1	4.9	0.0	4.1	8.8	0.0	11.2	83.2	0.0	74.3	0.0	0.0	9.4
Non-MSA AA	20	2,490,586	100.0	3,333	19.4	10.0	6.3	18.7	5.0	21.0	21.5	25.0	22.3	40.4	60.0	33.5	0.0	0.0	17.0
Total	20	2,490,586	100.0	4,705	17.6	10.0	4.8	17.2	5.0	16.0	20.1	25.0	19.1	45.1	60.0	45.4	0.0	0.0	14.8

Source: 2015 ACS; 2020 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 AA	4	802,000	16.7	1,512	7.0	0.0	1.7	9.9	0.0	6.2	11.0	0.0	12.6	72.1	75.0	64.6	0.0	25.0	14.9
Non-MSA AA	20	2,487,332	83.3	3,586	19.4	10.0	7.7	18.7	25.0	20.8	21.5	20.0	23.9	40.4	45.0	31.0	0.0	0.0	16.6
Total	24	3,289,332	100.0	5,098	17.7	8.3	5.9	17.5	20.8	16.4	20.1	16.7	20.5	44.8	50.0	41.0	0.0	4.2	16.1

Source: 2015 ACS; 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
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 AA	3	571,400	13.0	751	7.0	66.7	2.9	5.4	0.0	6.0	10.8	33.3	12.9	76.8	0.0	65.2	0.0	0.0	12.9
Non-MSA AA	20	2,365,832	87.0	2,498	18.6	15.0	11.1	19.5	15.0	25.5	22.9	30.0	23.5	39.0	40.0	27.1	0.0	0.0	12.8
Total	23	2,937,232	100.0	3,249	16.8	21.7	9.2	17.4	13.0	21.0	21.1	30.4	21.1	44.7	34.8	36.0	0.0	0.0	12.8

Source: 2020 ACS; 2022 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0%.

Table Q - Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020
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	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Columbus MSA AA	1	596,309	4.8	514	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0
Non-MSA AA	20	4,530,197	95.2	935	11.4	10.0	9.6	7.1	15.0	5.9	40.9	65.0	40.2	40.5	10.0	44.3	0.2	0.0	0.0
Total	21	5,126,505	100.0	1,449	9.0	9.5	6.2	5.6	14.3	3.8	32.3	61.9	25.9	53.0	14.3	64.0	0.1	0.0	0.0

*Source: 2020 D&B Data; 2020 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0%.*

Table Q - Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2021
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Columbus MSA AA	0	0	0.0	669	0.0	0.0	0.0	0.0	0.0	0.0	30.7	0.0	20.3	69.3	0.0	79.7	0.0	0.0	0.0
Non-MSA AA	20	1,850,658	100.0	1,076	11.6	5.0	6.8	7.2	5.0	6.0	40.2	65.0	42.5	40.8	25.0	44.5	0.2	0.0	0.2
Total	20	1,850,658	100.0	1,745	8.3	5.0	4.2	5.2	5.0	3.7	37.5	65.0	34.0	48.8	25.0	58.0	0.2	0.0	0.1

*Source: 2021 D&B Data; 2021 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0%.*

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

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	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Columbus MSA AA	1	130,000	4.8	601	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0
Non-MSA AA	20	3,945,093	95.2	1,171	0.9	0.0	0.3	18.3	10.0	16.6	61.5	75.0	63.2	19.1	15.0	19.9	0.1	0.0	0.0
Total	21	4,075,093	100.0	1,772	0.6	0.0	0.2	12.6	9.5	10.9	42.3	71.4	41.8	44.5	19.0	47.1	0.0	0.0	0.0

Source: 2022 D&B Data; 2022 CRA Aggregate Data.
 Due to rounding, totals may not equal 100.0%.

Table R - Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Columbus MSA AA	1	596,309	4.8	514	91.2	100.0	48.8	3.2	0.0	5.6	0.0
Non-MSA AA	20	4,530,197	95.2	935	76.7	50.0	36.3	5.8	45.0	17.5	5.0
Total	21	5,126,505	100.0	1,449	79.7	52.4	40.7	5.2	42.9	15.0	4.8

Source: 2020 D&B Data; 2020 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0%.

Table R - Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Columbus MSA AA	0	0	0.0	669	88.0	0.0	52.3	3.7	0.0	8.4	0.0
Non-MSA AA	20	1,850,658	100.0	1,076	76.6	75.0	51.3	5.4	15.0	18.0	10.0
Total	20	1,850,658	100.0	1,745	79.8	75.0	51.7	4.9	15.0	15.3	10.0

Source: 2021 D&B Data; 2021 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0%.

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

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Columbus MSA AA	1	130,000	4.8	601	92.9	100.0	55.2	2.0	0.0	5.1	0.0
Non-MSA AA	20	3,945,093	95.2	1,171	84.6	75.0	59.9	3.4	25.0	12.0	0.0
Total	21	4,075,093	100.0	1,772	87.2	76.2	58.4	3.0	23.8	9.8	0.0

*Source: 2022 D&B Data; 2022 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0%.*

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2020

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Columbus MSA AA	0	0	0.0	6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	100.0	0.0	100.0	0.0	0.0	0.0
Non-MSA AA	20	3,347,426	100.0	109	1.2	0.0	0.9	1.7	0.0	0.0	46.9	30.0	55.0	50.0	70.0	44.0	0.2	0.0	0.0
Total	20	3,347,426	100.0	115	1.2	0.0	0.9	1.6	0.0	0.0	44.4	30.0	52.2	52.7	70.0	47.0	0.2	0.0	0.0

Source: 2020 D&B Data; 2020 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0%.

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

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Columbus MSA AA	0	0	0.0	4	0.0	0.0	0.0	0.0	0.0	0.0	17.5	0.0	0.0	82.5	0.0	100.0	0.0	0.0	0.0
Non-MSA AA	20	3,282,024	100.0	138	1.4	0.0	0.0	1.6	0.0	0.0	45.1	45.0	63.0	51.8	55.0	37.0	0.2	0.0	0.0
Total	20	3,282,024	100.0	142	1.3	0.0	0.0	1.5	0.0	0.0	43.0	45.0	61.3	54.0	55.0	38.7	0.2	0.0	0.0

Source: 2021 D&B Data; 2021 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0%.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Columbus MSA AA	0	0	0.0	3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	100.0	0.0	100.0	0.0	0.0	0.0	
Non-MSA AA	20	3,669,998	100.0	144	0.5	0.0	0.0	4.0	0.0	1.4	80.4	75.0	84.0	15.0	25.0	14.6	0.2	0.0	0.0	
Total	20	3,669,998	100.0	147	0.4	0.0	0.0	3.6	0.0	1.4	72.3	75.0	82.3	23.5	25.0	16.3	0.1	0.0	0.0	

*Source: 2022 D&B Data; 2022 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0%.*

Table T - Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2020

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Columbus MSA AA	0	0	0.0	6	100.0	0.0	50.0	0.0	0.0	0.0	0.0
Non-MSA AA	20	3,347,426	100.0	109	97.1	75.0	56.9	1.5	25.0	1.5	0.0
Total	20	3,347,426	100.0	115	97.3	75.0	56.5	1.4	25.0	1.4	0.0

Source: 2020 D&B Data; 2020 CRA Aggregate Data.
 Due to rounding, totals may not equal 100.0%.

Table T - Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2021

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Columbus MSA AA	0	0	0.0	4	100.0	0.0	50.0	0.0	0.0	0.0	0.0
Non-MSA AA	20	3,282,024	100.0	138	97.2	85.0	50.7	1.4	15.0	1.4	0.0
Total	20	3,282,024	100.0	142	97.4	85.0	50.7	1.3	15.0	1.3	0.0

Source: 2021 D&B Data; 2021 CRA Aggregate Data.
 Due to rounding, totals may not equal 100.0%.

Table T - Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Columbus MSA AA	0	0	0.0	3	100.0	0.0	66.7	0.0	0.0	0.0	0.0
Non-MSA AA	20	3,669,998	100.0	144	98.0	85.0	50.7	0.9	15.0	1.1	0.0
Total	20	3,669,998	100.0	147	98.2	85.0	51.0	0.8	15.0	1.0	0.0
<i>Source: 2022 D&B Data; 2022 CRA Aggregate Data. Due to rounding, totals may not equal 100.0%.</i>											